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(NO FILING FEE PURSUANT TO GOV'T CODE § 6103)

6 Attorneys for Respondent
7 California Department of Transportation

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF SAN FRANCISCO

10 MARK BAKER,

11 Petitioner,

12 v.

13 BAY AREA TOLL AUTHORITY, et al.,

14 Respondents,

15
16
17 ILLUMINATE, et al.,

18 Real Parties in Interest.

Case No.: CPF-24-518814

**DECLARATION OF JENNIFER FLINT IN
SUPPORT OF RESPONDENT STATE OF
CALIFORNIA DEPARTMENT OF
TRANSPORTATION'S DEMURRER**

[CEQA CASE]

Hearing date: April 21, 2025
Hearing time: 2:00 p.m.
Courtroom: Department 606
Judge: Hon. Jeffrey S. Ross

Action filed: December 16, 2024

1 I, Jennifer A. Flint, declare as follows:

2 1. I am an attorney representing Respondent, the State of California Department of
3 Transportation (“State”) in this action. I have personal knowledge of the facts stated herein, and if
4 called, would testify to them.

5 2. On February 19, 2025, the State sent a meet-and-confer letter to Mr. Baker, expressing
6 the State’s intent to file both a demurrer and a motion to strike as to Mr. Baker’s Petition. A true and
7 correct copy of the letter is attached as **Exhibit A**.

8 3. As for the demurrer, the February 19, 2025 letter advised that the State intended to
9 demurrer to the entire Petition for, among other reasons, the failure to allege facts sufficient to
10 establish standing. The letter also advised that the State intended to demurrer to each cause of action,
11 for various reasons as to each specific cause of action. The February 19th letter set forth the grounds
12 for the State’s intended demurrer, with legal support, and the State’s availability to meet and confer
13 regarding the letter. (See **Exhibit A**.)

14 4. On February 19, 2025, Mr. Baker sent me an email and attached his own meet-and-confer
15 letter in response. A true and correct copy of Mr. Baker’s responsive meet-and-confer letter is attached
16 as **Exhibit B**.

17 5. After Mr. Baker’s initial February 19, 2025 email and letter, Mr. Baker and I exchanged a
18 series of emails regarding the State’s meet-and-confer letter and Mr. Baker’s positions. A true and
19 correct copy of the February 19, 2025 email exchanges is attached as **Exhibit C**.

20 6. While Mr. Baker had indicated on February 19th that he would not be meeting in person
21 with the State regarding its meet-and-confer letter (see **Exhibit C**), Mr. Baker emailed me the
22 following day, February 20th, and indicated he was available for an in-person meeting that morning. A
23 true and correct copy of the February 20, 2025 email exchange between Mr. Baker and me is attached
24 as **Exhibit D**.

25 7. On February 20, 2025, Mr. Baker, myself, and co-counsel for the State, Nicholas Dyess,
26 met via videoconference, during which the grounds for the State’s demurrer were addressed.

27 8. After exchanging letters and emails on February 19, 2025, and conducting the meeting
28 via videoconference on February 20, 2025, Mr. Baker and the State were not able to reach agreement

1 resolving the grounds for the State's intended demurrer.

2 I declare under penalty of perjury of the laws of the State of California that the foregoing is true
3 and correct. Executed on this 3rd day of March 2025 in San Francisco, California.

4
5 By: 
6 _____
7 JENNIFER A. FLINT
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EXHIBIT A

California Department of Transportation

LEGAL DIVISION – BAY AREA LEGAL OFFICE
111 GRAND AVENUE, SUITE 11-100
OAKLAND, CA 94612-3717

Mail: P. O. BOX 24325, OAKLAND, CA 94623-1325

(510) 433-9100 FAX (510) 433-9167 TTY 711

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February 19, 2025

VIA EMAIL ONLY

Mark Baker
9450 SW Gemini Drive PMB 44671
Beaverton, OR 97008
mbaker@softlights.org

RE: *Mark Baker v. Bay Area Toll Authority, et al.*
San Francisco County Superior Court, Case No.: CPF-24-518814

Meet and Confer Regarding Demurrer and Motion to Strike the Petition

Mr. Baker,

This letter is to meet and confer as required by California Code of Civil Procedure sections 430.41 and 435.5 regarding the "Petition for Writ of Mandate and Complaint for Injunctive Relief" ("Petition") filed in the above-referenced matter. As set forth below, Respondent California Department of Transportation (the "State") intends to file a demurrer as to all causes of action set forth in the Petition. In addition, the State intends to file a motion to strike the Petition and/or, in the alternative, portions of the Petition. I am available to meet and confer regarding the below tomorrow, February 20, or Friday, February 21. Please let me know which date and the time you can meet, and I will set up a call or virtual meeting.

Demurrer

All Causes of Action: grounds for demurrer include that the Petition fails to allege facts sufficient to establish standing; and due to uncertainty for failure to sufficiently identify which causes of action and/or allegations are claimed against which parties.

First Cause of Action: the First Cause of Action alleges that a full CEQA analysis and EIR should have been prepared and challenges the determination, made by BATA, that the project is exempt from CEQA. The CEQA claim fails as a matter of law as against the State because, as acknowledged in the Petition, the State is not the lead agency. As such, the State is not responsible for making the determination as to whether a project is subject to/exempt from CEQA and any corresponding duties relating

thereto. (See Pub. Res. Code, §§ 21067; 21152.) Further, the First Cause of Action is barred by the statute of limitations. (See Pub. Res. Code, § 21167, subd. (d), in effect in 2023.)

Second Cause of Action: the Second Cause of Action is barred because state courts do not have jurisdiction over NEPA claims. (See *Califano v. Sanders* (1977) 430 U.S. 99, 105-107.)

Third Cause of Action: the Third Cause of Action alleges violation of the ADA and demands an “ADA analysis.” The ADA claim fails as a matter of law as it acknowledges that no ADA analysis is required. Nothing in the ADA requires an “ADA analysis” as part of an EIR or other process prior to implementation of a public improvement or facility. (See 42 U.S.C. §§ 12131 – 12165; 28 C.F.R. § 35.101, et seq.) In addition, this claim fails to assert a valid claim because it does not set forth the required elements of an ADA claim.

Fourth Cause of Action: the Fourth Cause of Action alleges violation of Section 504 of the Rehabilitation Act. This claim fails for the same reasons set forth above as to the Fourth Cause of Action. (See *Bouslog v. Care Options Management Plans and Supportive Services, LLC* (N.D. Cal. 2020) 459 F.Supp.3d 1281, 1286-1287.)

“Sixth”¹¹ Cause of Action: the fifth and final cause of action alleges violation of the Equal Protection Clause. This cause of action fails as a matter of law and fails to assert a valid claim against the State because it does not set forth the required elements of an equal protection claim, including but not limited to failing to allege the disparate treatment of petitioner among similarly situated individuals; and fails to challenge any law that allegedly causes disparate treatment. (See *Voronin v. Garland* (C.D. Cal., Apr. 20, 2021, No. 2:20-CV-07019-ODW (AGRX)) 2021 WL 1546957, at *5.) Further, this claim, brought under the Federal Constitution, must be dismissed because petitioner has a statutory remedy under Section 1983. (See *Gauvin v. Trombatore* (N.D. Cal. 1988) 682 F.Supp. 1067, 1071.)

It is the State's position that the above deficiencies cannot be cured by amendment. The State therefore requests that the Petition as alleged against the State be dismissed.

Motion to Strike

The State intends to move to strike the entire Petition, as it is not verified as required by California Code of Civil Procedure section 1086.

¹¹ The Petition does not contain a listed Fifth Cause of Action.

In addition and/or in the alternative, the State intends to move to strike your request that the Court enter judgment of: "D) Writ of mandate directing Respondents to develop an ADA analysis." (Petition ¶ 75, page 19, line 12.) This requested relief is subject to a motion to strike because, as your own Petition concedes, there is no basis under law for requesting an "ADA analysis" and, thus, the request is improper on its face.

Nothing in the ADA or its implementing regulations requires an "ADA analysis" as part of an Environmental Impact Report or other process prior to the implementation of the public entity's program or construction of the improvement or facility. (See 42 U.S.C. §§ 12131 – 12165; 28 C.F.R. § 35.101, et seq.) Because there is no basis for seeking an "ADA analysis," whether in an EIR or otherwise, the claim seeking a writ of mandate ordering an "ADA analysis" is improper on its face and is subject to a motion to strike. (See *PH II, Inc. vs. Superior Court* (1995) 33 Cal.App.4th 1680, 1682-1683.) It is the State's position that this deficiency cannot be cured by amendment. The State therefore will request the Court to strike the identified portion of the Petition.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Flint", written in a cursive style.

Jennifer A. Flint
Deputy Attorney

cc: Nicholas Dyess, Esq.

EXHIBIT B



9450 SW Gemini Drive
PMB 44671
Beaverton, OR 97008

February 19, 2025

BY EMAIL

Jennifer Flint, Deputy Attorney
California Department of Transportation
Jennifer.Flint@dot.ca.gov

Re: Meet and Confer Regarding Demurrer and Motion to Strike the Petition – San Francisco Superior Court Case CPF-24-518814

Dear Jennifer Flint,

I am in receipt of the Meet and Confer Regarding Demurrer and Motion to Strike the Petition dated February 19, 2025. This letter is provided in response.

A Demurrer at this stage of the process is premature. Since the date of the filing of the complaint, Petitioner has become aware of numerous violations of statute by CalTrans and BATA that have not been addressed by either CalTrans or BATA. Fundamentally, the decision by BATA and CalTrans to designate BATA as the Lead Agency, is a violation of California Public Resources Code Section 21067 which states, "“Lead agency” means the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment." CalTrans is the agency that has the principal responsibility of carrying out and approving the Bay Lights 360 project and is thus the Lead Agency.

California Code of Regulations Section 15061(a) states, “(a) Once a lead agency has determined that an activity is a project subject to CEQA, a lead agency shall determine whether the project is exempt from CEQA.” Since BATA is not the Lead Agency for the Bay Lights 360 project, BATA is not authorized to determine whether the project is exempt from CEQA. Only CalTrans, as the Lead Agency by statute, can make the determination of whether the Bay Lights 360 project is exempt from CEQA.

On August 15, 2023, BATA filed a Notice of Exemption with the San Francisco County Clerk, unlawfully masquerading as the Lead Agency for the Bay Lights 360 project. Because BATA is not the Lead Agency, as a matter of law, the NOE filed by BATA is void and not applicable to the Bay Lights 360 project. Since CalTrans is the lawful Lead Agency, only CalTrans can make the determination if the Bay Lights 360 project is exempt from CEQA requirements.

CalTrans is in possession of a report titled Effects of LED Lighting on Terrestrial Wildlife which was published in April 2023. (<https://dot.ca.gov/-/media/dot-media/programs/research-innovation-system-information/documents/final-reports/ca23-3696-finalreport.pdf>). This report was commissioned by CalTrans and contains proof that LED lights have an adverse impact on wildlife. This

189-page report existed prior to the unlawful filing of the NOE by BATA. Since, as a matter of law, CalTrans is the Lead Agency, and since CalTrans is the designated agency which makes the determination of whether a project is exempt from CEQA requirements, the Effects of LED Lighting on Terrestrial Wildlife report, commissioned by CalTrans, debunks any assertion that the Bay Lights 360 project is exempt from CEQA requirements.

In emails from CalTrans to Petitioner, CalTrans has consistently stated or inferred that CalTrans is the agency that has principal responsibility for carrying out and approving the Bay Lights 360 project. Therefore, as a matter of law and as a matter of documentation, CalTrans is the Lead Agency and BATA's NOE filing is void. The result is that all other matters and causes of action need not be addressed because the Bay Lights 360 project procedure failed at the very first step of assigning the legally mandated Lead Agency.

In response to the verification issue in California Code of Civil Procedure section 1086, the verification was filed with the court on February 13, 2025, and is pending court review.

The proposed date for the Preliminary Injunction is February 25, 2025. The Case Management Conference is scheduled for March 17, 2025. It would be premature for CalTrans to submit a Demurrer until the Court has ruled on the Lead Agency issue, which will likely occur because of the Preliminary Injunction hearing. Therefore, I propose that the Meet and Confer date for the proposed Demurrer be set to 5 days after the Preliminary Injunction ruling by the Court.

Sincerely,

/s/ Mark Baker

President

Soft Lights Foundation

mbaker@softlights.org

EXHIBIT C

From: [Mark Baker](#)
To: [Flint, Jennifer@DOT](#)
Cc: [Dyess, Nicholas@DOT](#); [Higuera, Amy](#); [Kathleen Kane](#)
Subject: Re: Caltrans Meet and Confer Letter to Mark Baker - Baker v. Bay Area Toll Authority, et al. - San Francisco Superior Court Case No. CPF-24-518814
Date: Wednesday, February 19, 2025 5:40:02 PM
Attachments: [image001.png](#)

EXTERNAL EMAIL. Links/attachments may not be safe.

Ms. Flint,

I want to make it absolutely clear that just because you demand that we have a Meet and Confer this week does not mean that I am available to attend the Meet and Confer this week. For example, I am attending a federal court hearing on Thursday. A decision by you to act unilaterally, skipping the Meet and Confer process, makes you subject to court sanctions. I'm not going to be bullied by you. You need to act in a good-faith manner to resolve the issues at hand.

Issue Number One: I have proposed February 25, 2025 for the Preliminary Injunction hearing, or alternatively February 26, 2025. You have not responded.
Issue Number Two: I propose the Meet and Confer for the Demurrer hearing to be 5 days after the ruling from the Preliminary Injunction hearing.

Because of your decision to ignore the issue of the Preliminary Injunction hearing date, and because I have also not received a response from BATA, it is my intent to ask the court for the date of February 25, 2025.

Mark Baker

On Wed, Feb 19, 2025 at 5:26 PM Flint, Jennifer@DOT <Jennifer.Flint@dot.ca.gov> wrote:

Mr. Baker,

The State is entitled to file a Demurrer and Motion to Strike as part of its defense, which the State intends to file next week. I am assuming from your responsive email that you are not amenable to having a call or virtual meeting tomorrow or Friday to further discuss the State's meet-and-confer letter and your written response to it.

As for your response letter, the State disagrees with your position that it is the lead agency and that the August 15, 2023 BATA Notice of Exemption is void and not applicable. Accordingly, we have not been able to reach an agreement that resolves the State's grounds for demurrer as to your First Cause of Action. Further, you indicate that you filed a verification with the court on February 13, 2025 and that it is pending court review. Because no verification has been filed and deemed accepted by the Court as part of the Petition, the State will still demurrer as to all causes of action for the failure of the Petition to be verified. Your response did not address the State's grounds for demurrer as to the remaining causes of

action and, accordingly, the State intends to proceed with a Demurrer as to those remaining causes of action, as indicated in the State's meet-and-confer letter. Finally, your response did not address the State's intended Motion to Strike. Accordingly, the State intends to proceed with a Motion to Strike, as indicated in the State's meet-and-confer letter.

Regards,

Jennifer

From: Mark Baker <mbaker@softlights.org>
Sent: Wednesday, February 19, 2025 4:49 PM
To: Flint, Jennifer@DOT <Jennifer.Flint@dot.ca.gov>
Cc: Dyess, Nicholas@DOT <Nicholas.Dyess@dot.ca.gov>; Kathleen Kane <kkane@bayareametro.gov>; Higuera, Amy <ahiguera@downeybrand.com>
Subject: Re: Caltrans Meet and Confer Letter to Mark Baker - Baker v. Bay Area Toll Authority, et al. - San Francisco Superior Court Case No. CPF-24-518814

EXTERNAL EMAIL. Links/attachments may not be safe.

Ms. Flint

I filed my complaint on December 16, 2024. Until today, CalTrans has slow-walked everything. For example, CalTrans is attempting to set the Preliminary Injunction hearing for April, 2025. Suddenly, today, CalTrans needs an immediate response, as if there is an emergency. It is difficult to reconcile the change in attitude by CalTrans.

There is an order to this process. The first issue at hand, which CalTrans has not resolved yet, is the date for the Preliminary Injunction hearing. The parties had a Meet and Confer on this topic, but the date is still not set. I proposed February 25, 2025. You did not respond.

We do indeed need to Meet and Confer on the CalTrans proposed Demurrer, but not until after the Preliminary Injunction hearing.

Do you agree to the February 25, 2025 date for the Preliminary Injunction hearing? If not, would you agree to February 26?

Mark Baker

On Wed, Feb 19, 2025 at 4:36 PM Flint, Jennifer@DOT <Jennifer.Flint@dot.ca.gov> wrote:

Mr. Baker,

As indicated in my meet-and-confer letter, the State intends to file a Demurrer and Motion to Strike. By way of the State's meet-and-confer letter and the emails exchanged below, the State is attempting to arrange for a telephone call or virtual meeting with you to discuss the State's meet-and-confer letter and your written response to the same. I have offered two days for that call, and you have not let me know your availability. Please let me know if you are amendable to having such a call or virtual meeting either tomorrow or Friday. Regards,

Jennifer

From: Mark Baker <mbaker@softlights.org>
Sent: Wednesday, February 19, 2025 3:34 PM
To: Flint, Jennifer@DOT <Jennifer.Flint@dot.ca.gov>
Cc: Dyess, Nicholas@DOT <Nicholas.Dyess@dot.ca.gov>; Higuera, Amy <ahiguera@downeybrand.com>; Kathleen Kane <kkane@bayareametro.gov>
Subject: Re: Caltrans Meet and Confer Letter to Mark Baker - Baker v. Bay Area Toll Authority, et al. - San Francisco Superior Court Case No. CPF-24-518814

EXTERNAL EMAIL. Links/attachments may not be safe.

Ms. Flint,

The setting of a Meet and Confer date and time is not a unilateral process. If you attempt to set the date and time of the Demurrer unilaterally, I will file for sanctions against you.

Mark Baker

On Wed, Feb 19, 2025 at 3:10 PM Flint, Jennifer@DOT <Jennifer.Flint@dot.ca.gov> wrote:

Mr. Baker,

Thank you for your written response. We will discuss the matters you have set forth in your written response during a meet and confer meeting, either tomorrow or Friday. Please let us know which day and time; otherwise, I will go ahead and send you an invite for 11:00 a.m. tomorrow, February 20. Thank you,

Jennifer

From: Mark Baker <mbaker@softlights.org>
Sent: Wednesday, February 19, 2025 2:47 PM
To: Flint, Jennifer@DOT <Jennifer.Flint@dot.ca.gov>
Cc: Dyess, Nicholas@DOT <Nicholas.Dyess@dot.ca.gov>; Kathleen Kane <kkane@bayareametro.gov>; Higuera, Amy <ahiguera@downeybrand.com>
Subject: Re: Caltrans Meet and Confer Letter to Mark Baker - Baker v. Bay Area Toll Authority, et al. - San Francisco Superior Court Case No. CPF-24-518814

EXTERNAL EMAIL. Links/attachments may not be safe.

Ms. Flint,

Attached is a response to the proposed Meet and Confer for the Demurrer.

Sincerely,

Mark Baker

President

Soft Lights Foundation

www.softlights.org

mbaker@softlights.org

X: @softlights_org

Bluesky: @softlights-org.bsky.social

On Wed, Feb 19, 2025 at 12:36 PM Flint, Jennifer@DOT <Jennifer.Flint@dot.ca.gov> wrote:

Mr. Baker,

Attached please find a meet and confer letter regarding a Demurrer and Motion to Strike that the State intends to file in the above-referenced matter. Per the letter, we are available to meet with you regarding the letter tomorrow or Friday. Please let me know which date (and a time) that works for you. Regards,

Jennifer A. Flint (she/her)

Deputy Attorney

California Department of Transportation

Bay Area Legal Division

111 Grand Ave, Ste 11-110, Oakland, CA 94612

Mail to: P.O. Box 24325, Oakland, CA 94623-1325

Office: 510.433.9100

Cell: 415.635.4175



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EXHIBIT D

From: Flint, Jennifer@DOT
To: Mark Baker
Cc: Dyess, Nicholas@DOT
Subject: RE: Lead Agency - Caltrans Meet and Confer - Case No. CPF-24-518814
Date: Thursday, February 20, 2025 8:02:00 AM

I will send a Webex meeting invite for 10 a.m.

From: Mark Baker <mbaker@softlights.org>
Sent: Thursday, February 20, 2025 6:24 AM
To: Flint, Jennifer@DOT <Jennifer.Flint@dot.ca.gov>
Cc: Dyess, Nicholas@DOT <Nicholas.Dyess@dot.ca.gov>
Subject: Lead Agency - Caltrans Meet and Confer - Case No. CPF-24-518814

EXTERNAL EMAIL. Links/attachments may not be safe.

Ms. Flint,

My federal hearing for 10am today was cancelled. I am available to Meet and Confer to discuss ONLY the topics of Lead Agency, agency carrying out the project, agency approving the project, and preliminary injunction hearing.

CCR Section 21067 states, ""Lead agency" means the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment."

Let me know if you wish to Meet and Confer at 10am today, February 20, 2025.

Mark Baker
cell: 408-455-9233

Case Name: *Mark Baker vs. Bay Area Toll Authority, et al.*
Case No.: San Francisco County Superior Court No. CPF-24-518814

PROOF OF ELECTRONIC SERVICE

I am employed in the City of Oakland, State of California. I am over the age of 18 years and not a party to the within action. My business address is 111 Grand Avenue, Oakland, California 94612; MAIL: P.O. BOX 24325, Oakland, CA 94623-1325. On the date set forth below, I served a true copy of the following document(s):

DECLARATION OF JENNIFER FLINT IN SUPPORT OF RESPONDENT STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION’S DEMURRER

on the interested party to said action by the following means:

[XX] (BY ELECTRONIC-MAIL ONLY) by attaching a copy of the document(s) in PDF format sent from Rosalie.H.Nguyen@dot.ca.gov to the email addresses of the parties listed below, pursuant to Code of Civil Procedure section 1010.6, permitting electronic service of notices or documents that may be served by mail, express mail, overnight delivery, or facsimile transmission. No hard copies will follow.

COUNSEL OF RECORD/PARTY	EMAIL ADDRESSES
<p>Mark Baker Soft Lights Foundation 9450 SW Gemini Drive PMB 44671 Beaverton, OR 97008</p> <p>Petitioner, Pro Se</p>	<p>mbaker@softlights.org</p>
<p>Amy R. Higuera, Esq. Daria A. Gossett, Esq. Samuel D. Bacal-Graves, Esq. DOWNEY BRAND LLP 621 Capitol Mall, 18th Floor Sacramento, CA 95814</p> <p>Counsel for Respondents, Bay Area Toll Authority and Metropolitan Transportation Commission</p>	<p>ahiguera@DowneyBrand.com dgossett@downeybrand.com sbacalgraves@downeybrand.com</p>
<p>Kathleen Kane, Esq. 375 Beale Street, Suite 800 San Francisco, CA 94105-2066</p> <p>Counsel for Respondents, Bay Area Toll Authority and Metropolitan Transportation Commission</p>	<p>kkane@bayareametro.gov</p>

1 Illuminate the Arts
2 P.O. Box 194210
3 San Francisco, CA 94119-4210

ben@illuminate.org

4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and correct. Executed on March 3, 2025, at Oakland, California.

6 

7 ROSALIE NGUYEN SOLOMON, Declarant

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