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Mr. Mike McKeever
Executive Director
Sacramento Area Council of Government
1415 L Street, Suite 300
Sacramento, Ca 95814

DRAFT MTP 2035 and EIR - COMMENTS CONCERNING PROPOSED BROADWAY BRIDGE

Dear Mr. McKeever,

The proposed bridge across the Sacramento River at Broadway should not be included in MTP 20035. It would go against the grain of MTP 2035, cause severe negative impacts and be a very expensive way to shift commuter traffic problems from one side of the Sacramento River to the other, rather than curing them.

- The four lane bridge would require a movable span like the tower bridge, adding significant operation and maintenance costs, in perpetuity, to its \$50 million initial cost. Street construction and modification would also be required.
- Two decades of effort in making Broadway a “complete street” would be reversed by the addition of two traffic lanes west of Riverside Boulevard. Existing bike lanes would have to be removed and/or sidewalks narrowed. Major widening would be needed along the cemetery to retain the existing left turn lanes.
- The bridge would cause negative traffic impacts on Broadway and residential streets perpendicular and parallel to it. There are not viable means to mitigate those impacts. Growing numbers of commuters who walk or ride bicycles would be severely impacted.
- The impact of the increased traffic past the New Helvitia and River Oaks housing complexes and through parts of Southside Park would cause environmental injustice.
- The bridge is not qualified to be listed on Road Capital Investments Identified as Priorities through Goods Movement Planning Efforts list, because it would not improve access to the port as claimed.

One or a combination of the following alternatives could meet the needs of the West Sacramento commuters and proposed riverfront developments:

Representing 6,000 Sierra Club members in Sacramento County

11-1
cont.

- Increasing the carrying capacity of the Tower and I Street Bridges by improving the streets serving them.
- Accelerating the programmed improvement of the I-5/US 50 Interchange.
- Extending the streetcar line proposed across the Tower to the West Sacramento City Hall to Southport.
- Constructing a transit/bicycle/pedestrian bridge at R Street.

11-2

Proposed Bridge

The description of the proposed \$50 million, 4 lane bridge is inadequate in both MTP 2035 and EIR. The decision makers, the SACOG board of directors, and others need to appreciate the magnitude of the proposal. To accommodate river navigation, it would have to have a moveable span and full time operators in perpetuity, like the Tower and I Street Bridges. Broadway would have to be widened in Sacramento and a new street constructed in West Sacramento.

11-3

Adverse Impacts on Broadway

Broadway is a 2 lane street with sidewalks, bike lanes and parallel parking most of the way between Riverside Boulevard and Front Street. It is just two traffic lanes between Front Street and the river. Since the proposed bridge would have 4 lanes, two traffic lanes would have to be added to Broadway. This would require eliminating the bike lanes and/or narrowing the sidewalks. Gaining space for two additional lanes by eliminating the parallel parking is not viable because the parking is used by visitors on the historic cemetery, residents and visitors to the New Helvita housing complex, users of the Southside Park soccer/softball fields, business patrons and, on Sunday, patrons of the Asian street market. Additional widening would be required along the cemetery to accommodate existing left turn lanes.

11-4

Traffic Impacts

A stated purpose of the proposed bridge is to provide drivers an alternate route to avoid the crowded the I-5/ US 50 Interchange. The vehicles going to and from the bridge would cause severe negative traffic impacts on Broadway and residential street perpendicular and parallel to it. There are no viable mitigation measures to treat these impacts, which would be: aesthetic, air quality, noise, public services and transportation in nature. People impacted would be residents, visitors, students, park users, business customers, walkers, bicyclists and car and bus occupants. The air quality and noise impacts would be the hardest on, and tend to discourage, the growing number of bicycling and walking commuters on streets north and south of Broadway

11-5

Aesthetic Impacts

The adverse impacts would be lines of commuter and other vehicles on scenic streets with attractive structures, large trees, well tended lawns and landscaping in yards, parks and cemeteries. The EIR says “The aesthetic value of an area is a measure of its visual character and quality, combined with the viewer response to the area.” “The scenic quality component can best be described as the **overall impression that an individual viewer retains after driving though, walking though, or flying over an area . . .**” (Page 4-1); “Visual quality is the character, condition, and quality of **a scenic landscape or other visual resource and how it is perceived and valued by the public.**” (Page 4-2); and “Aesthetically significant features occur in a diverse array of environments within the SACOG region, ranging in character from **urban centers** to rural agricultural lands to natural woodlands. The extraordinary range of visual features in the

11-5
cont. region is afforded by the mixture of climate, topography, and flora and fauna found in the natural environment, and the diversity of style, composition, and distribution of **the built environment.**”(Page 4-3)

Air Quality Impacts

11-6 The adverse impacts would health effects, appearance and smell of vehicle exhaust, especially exhaust from vehicles caught in traffic jams. The walkers and bicyclists that MTP 2035 is trying to encourage would be the closest to and likely the most severely affected by these impacts. The EIR says: “Air pollutants come from **vehicle exhaust**, ... Exhaust emissions from vehicles vary according to **driving speed**,” (Page 6-2).

While the statement: “The proposed MTP 2035 projects will improve traffic flows and reduce congestion system-wide, reducing the potential for carbon monoxide and particulate matter “hot spots” that can occur from exhaust of idling cars waiting to clear a heavily congested intersection or crossing.” (Page 6-15), may be true; it is equally true that an effect of building the proposed bridge would be to move air quality impact areas from the freeways and West Sacramento streets to Sacramento streets.

Noise Impacts

11-7 The adverse impact would be additional traffic noise on existing streets. The EIR says: “**Noise in a community has often been cited as a health problem, not in terms of actual damage such as hearing impairment, but in terms of inhibiting general well being and contributing to undue stress and annoyance.** The health effects of noise in the community arise from interference with human activities such as sleep, speech, recreation, and tasks demanding concentration or coordination.” (Page 14-2). The walkers and bicyclists that MTP 2035 is trying to encourage would be among closest people to the sources of noise caused by traffic going to and from the proposed bridge.

Public Services

11-8 The adverse impacts would be increases in response times and impeded access for emergency vehicles, primarily during commute hours. The EIR says: “Impact PS – 3: **Roadway congestion could affect response times and access for emergency fire, police and ambulance services.**” (Page 16-12). The argument that MTP 2035 will mitigate this impact area wide by slowing the historic growth rate of vehicle miles traveled would not help those needing the emergency services in the areas impacted by traffic caused by the bridge.

Transportation

11-9 The adverse impact would be commuter and other traffic causing loss of mobility within, into and out of effected neighborhoods for a whole range of activities from walking to parks or school, to driving to grocery stores, to walking, bicycling or riding buses to and from work or to visiting friends. The EIR says: “The criteria for determining whether the MTP 2035 would have significant environmental impacts related to transportation and traffic were based in part on the environmental checklist in Appendix G of the State CEQA Guidelines (14 CCR 15000 et seq.) and performance measures established by SACOG. According to the State CEQA Guidelines, significant impacts to transportation and traffic would occur if the plan would:

- Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections);
- **Conflict with adopted policies, plans, or programs supporting alternative transportation** (e.g. bus turnouts, bicycle racks)” (EIR Page 18-13).”.

Program vs. Project Impact Analysis

11-10

The EIR says “The purpose of this EIR is to analyze, on a **program level**, the environmental effects of the MTP for 2035, and to provide local decision-makers and the public with an objective analysis of the potential environmental consequences of implementation of the proposed set of improvements to the metropolitan transportation system. (Page ES-1). It also contains several statements like: “Because noise is a highly localized impact, specific and detailed analyses are most appropriate at the project level. Future **project-specific analysis** under CEQA will be required to determine the magnitude of noise and vibration impacts and identify appropriate potential mitigations for individual projects.” (Page 14-7). As discussed above, there are no viable ways to mitigate the traffic impacts that the bridge would cause (i.e. sound walls can mitigate aesthetic and sound impacts of some transit project, but cannot be constructed on existing city streets) so the program EIR is adequate to assess its impacts.

Environmental Injustice

11-11

The proposed Broadway bridge is listed in Appendix H Equity and Choice, a summary of key projects that are either within environmental justice areas or were identified as priority investments from environmental justice outreach efforts. The proposed bridge is listed on Page H-9 New/Expanded Bridges and Roads and Figure 9-1 Lower Income or Ethnically Diverse Areas shows that it would be adjacent to census block groups that meet both lower income and ethnic diversity criteria. Identifying the bridge project as a “negative local impact” (top of Page 9-26) is appropriate. The impact of added traffic on Broadway, 5th Street, Muir Way and in Southside Park would clearly offset a questionable benefit of people owning cars saving a few minutes in getting to mega stores in West Sacramento.

Access to the Port of Sacramento

11-12

The proposed bridge is inappropriately listed in Appendix J Road Capital Investments Identified as Priorities through Goods Movement Planning Efforts on Page 2, under Port Area. Construction of the bridge would not improve goods movement to and from the port. The City of West Sacramento has excluded port traffic from its residential areas. It is relatively easy to access US 50 from port by using Harbor Boulevard, but Stone Boulevard, in the direction of the proposed bridge, has been blocked at Industrial Boulevard. One now has to drive south all the way to the Club Pheasant to reach Jefferson Boulevard and backtrack north toward the proposed bridge site. Cars, but not large trucks, can reach the port from Jefferson Boulevard via Stone Boulevard, a largely residential street with a 5 ton load limit.

Alternative A - Maximize Use of Existing Bridges

11-13

Page 3-11, River Crossing Investments, contains the following bullet:
“Feather River crossing at Yuba City – Two 6-lane bridges, at 5th Street and 10th Street, with redesigned approaches and distribution on both ends, to link Yuba City and Marysville effectively and avoid the high cost of a third bridge in a “greenfields” location.”. The same concept could be applied to Sacramento River crossings where the cost of a Broadway bridge would be much greater than a low level bridge across the Feather River. Vehicle use of the Tower and I Street Bridges could be maximized by improving their approaches/exits. On the Sacramento side, improvements could be made at the I Street Bridge as part of realigning the UPRR tracks and developing the railyard; the planned abandonment of the Capitol Avenue – N Street connector could be stopped. On the West Sacramento side, reworking former State Route 285 could be done in a way to increase use of the Tower Bridge, including constructing an efficient intersection with a northward extension of South River Road, which is to bridge former barge canal to serve Southport.

11-13
cont.**Alternative B – Accelerate Revising the I-5/US 50 Interchange**

The projects listed on Appendix A2, Page 14 include “I-5/US 50, Revise I-5/US 50 Riverfront Interchange” and gives a date of 2029. Modifications to relieve the congestion in the interchange that is causing the demand for the proposed Broadway bridge could be accelerated. The revised interchange would serve a much greater portion of the traveling public and could be partly fund money that would be spent on a new bridge.

Alternative C – Extending the Street Car Line

The proposed streetcar line across the Tower Bridge to West Sacramento City Hall could be extended to Southport along the active, then abandoned railroad lines.

Alternative D - New Transit Bridge

A transit/pedestrian/bicycle bridge could be located at R Street to provide a transit link between Southport, the West Sacramento triangle, the Docks project, PERS headquarters, state office buildings and downtown Sacramento. The existing heavy rail bridge across I-5 might be modified to carry light rail, bicycles and pedestrians or, if necessary, initially used as a working platform to construct a parallel bridge.

If you have any questions on our comments, please call me at 916 557-1100 ext. 108

Sincerely,



Terry Davis

(For the Executive Committee of the Sacramento Group)

CC: Councilmember Rob Fong
Councilmember Lauren Hammond
Supervisor Jimmie Yee