FINAL CORRESPONDENCE

Description of Attached: Correspondence received after publishing the Agenda.

For the Meeting of: Tuesday, June 14, 2022, at 5:00 p.m.

Agenda Item: Consent Item 8

8. Environmental Impact Report and Preliminary Design Approval for the Broadway Bridge Project (T15155300)
   File ID: 2022-01107
   Location: District 4
   Recommendation: Adopt a Resolution: 1) certifying the Environmental Impact Report (EIR) and adopting the Findings of Fact, Statement of Overriding Considerations, and Mitigation Monitoring Plan; and 2) approving the preliminary plans for the Broadway Bridge Project (T15155300).
   Contact: Cecily Foote, Associate Civil Engineer, (916) 808-6843, cfoote@cityofsacramento.org; Jesse Gothan, Supervising Engineer, (916) 808-6897, jgothan@cityofsacramento.org; Ofelia Avalos, Engineering Services Manager, (916) 808-5054, oavalos@cityofsacramento.org, Department of Public Works
Please submit the attached document as our Public Comment.

Kirk Vyverberg  
Greater Land Park Planning Lead - 2040GP  
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Begin forwarded message:

From: Kirk Vyverberg <kvyverberg@comcast.net>  
Date: June 13, 2022 at 3:52:37 PM PDT  
To: Ryan Moore <RMoore@cityofsacramento.org>  
Subject: FEIR Public Comments - LPCA - Council Meeting 14June Item #8

Director Moore:

Attached is our Positions and Requests for the W. Sac Broadway Bridge FIER. We hope that you or your staff can inform and support the Discussion on this topic, addressing our concerns and requests, finding them reasonable and modest.

Kirk Vyverberg  
Greater Land Park Planning Lead - 2040GP  
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916.212.7693
The Land Park Community Association (LPCA) and the Upper Land Park Neighbors (UPLN) are requesting the City of Sacramento to add language that protects City of Sacramento streets from increased traffic impacts and ensure traffic safety. Both associations have worked on, and been involved in this project since its inception and have recently been assisted with reviewers from Sierra-Curtis Neighborhood Association (SCNA). We support the bridge and the Neighborhood-Friendly Bridge definitions adopted at the project launch by the City of Sacramento to ensure the benefits of the project were equally shared by the communities of both Cities. To that end, we offer following concerns and solutions for your adoption in response to the FEIR findings. and for a better project through an adopted City resolution.

Under California Environmental Quality Act (CEQA), the City of Sacramento is a "responsible agency. A Responsible Agency complies with CEQA by considering the EIR prepared by the Lead Agency (City of West Sacramento) and by reaching its own conclusions on whether and how to approve the project involved." (emphasis added) (West Sacramento Resolution 22-43, Certifying EIR for Bridge; May 18, 2022 West Sacramento Council Staff Report, Item #8, page 5.) Requested amendments are summarized on page 3.

PROBLEMS WITH BRIDGE PROJECT EIR

BRIDGE PROJECT PROCESS – Insufficient for a multi-decade transportation project
- Not ONE noticed public presentation on the Environmental Impacts was made to the City of Sacramento nor did it allow its citizens public input to Council, Planning Commission, nor responsible Staff.
- Given COVID, elections, and redistricting Sacramento Council representatives neither informed nor solicited response from constituents through either survey or Town Hall meetings in Sacramento.
- Effected Sacramento neighborhood EIR challenges were either dismissed or discounted by West Sacramento’s response, with Council EIR approval by consent and without discussion.
- Not a single mitigation action was proposed for Sacramento although the Project improves traffic in West Sacramento but contributes to future gridlock on the Broadway Corridor, the access ramps for Hwy 50, and commute to the City Center from South Land Park, Hollywood Park, Land Park, Upper land Park and Curtis Park neighborhoods.

BRIDGE PROJECT IMPACT ANALYSIS – Insufficient data input and unanswered questions
- Q: What was the basis for the transportation modality breakout used in the analysis of traffic impacts? FEIR response states that shows mobility breakout of uses, i.e. vehicles, public transit, bicycles, walking was based on "causal information" collected at 2015 workshop, but not the basis for the assessment of impacts described in the EIR/EA which remained undisclosed. (FEIR, Response to Comment O-3-07, page 4-98 and 4-99).
Q: What data do you have on “trip destinations” beyond historical patterns based on Land Use designations? FEIR states traffic analysis indicates “travelers from West Sacramento going east would quickly disperse to Sacramento roadways depending on the destination of the traveler. Traffic modeling results indicated traffic would mostly disperse using front St., 3rd and 5th street.” (emphasis added) (FEIR, page 4-11, last paragraph). FEIR states that they do not have detailed data to determine users’ destinations.

Q: Was the $1.5 billion UCD Aggie Square Med Center Project considered in the impact modeling? EIR states that “most traffic will go downtown” based upon “trip patterns between geographic areas based on anticipated land uses in the future.” (FEIR, Response to Comment O-4-5, page 4-107.) Yet, the break outs for destination traffic for each geographic area, (i.e. downtown vs. Aggie Square) were not presented. The entire UC Med Center was acknowledged as being outside the scope of their analysis.

Q: What was the source of your Land Use density inputs and their effect on traffic impacts – the 2035 or 2040 General Plan Update? EIR states “2040 General Plan is not relevant for use in the impact analysis for the proposed project.” (FEIR, Response to Comment O-3-3, page 4-97.) Note: The 2035 GP (2015) characterizes the Broadway Tower District from 9th-19th as low height/mid- density while the 2019 Central City Specific Plan (adopted) and the 2040 General Plan characterize the district as high density / mixed-use of six stories. Density increase have a direct relation to traffic safety risk increases.

Q: How do you reconcile the finding of no significant project impacts to intersections from 8th – 28th Streets when previous EIRs for the Broadway Complete Streets and the West Broadway Specific Plans included 8,000-11,000 daily trips from the West Sacramento Bridge resulting in cumulative project impacts of LOS-F (gridlock) throughout the corridor? LOS-F has been predicted in those traffic studies as far south as Riverside & Vallejo, at Land Park Dr.& Broadway, and on all Hwy 50 on/off ramps on W/X Streets. To this the WSB Bridge FEIR adds LOS-F to 3rd & 5th streets at Broadway.

SACRAMENTO’S OPPORTUNITY TO IMPROVE MOBILITY AND COMMERCIAL VITALITY

- Caltrans and West Sacramento benefit the most - 45,000 cars removed from freeway and West Sac streets. Shifts West Sacramento traffic from I Street Bridge to Broadway.
- Transportation Report states that I-5 Transportation concept Report (TCR) requires mitigation of unsatisfactory levels of performance (Los-F) suggesting that targeted operational improvements, intelligent transportation systems, and integrated corridor management will be needed (Broadway Bridge Transportation report, June 2020, page 23.)
- City of Sacramento adopted Neighborhood Friendly Bridge definitions for the project with the objective of no negative impacts to the local neighborhoods.

ADOPT AMENDMENTS BELOW IN THE FEIR AND A CITY RESOLUTION TO ENSURE NEIGHBORHOOD-FRIENDLY BRIDGE OBJECTIVES, PROTECT CITY STREETS AND PROVIDE PUBLIC SAFETY

1. Add directional signage at 3rd and 5th Streets directing traffic downtown and to X Street. This supports the Neighborhood-Friendly Bridge objective to protect residential streets and supports the stated EIR project objective of having traffic go downtown. (EIR Project Objective, EIR page 1-9).
2. Direct Broadway Complete Streets Project to include signage to direct Broadway traffic to X Street. This project is currently being designed, but hasn’t started construction.
3. Obligate Sacramento to perform a Traffic Analysis and Safety Evaluation after three years of bridge operation to determine actual impacts and mitigation as needed.

4. Develop a Transportation Standard of Significance that meets the traffic performance needs of the neighborhoods adjacent to the Central City (The Greater Land Park Community Plan neighborhoods). LOS F and the associated gridlock should never be adopted as a Standard without a corresponding Comprehensive Safety and Mobility Plan that includes multi-model alternatives supported by reliable Public Transportation. (reference 15 October 2019 Conditional Support for the Broadway complete Streets, LPCA).

5. To prevent additional contributions to gridlock, direct the Sacramento Planning & Development Staff to forego further local density increases in the 2040 General Plan Update, maintaining the intensity of development, as allowed in the current 2035 General Plan, throughout the Tower District (Broadway and W/X from 9th-19th Streets).

REASONABLE REQUESTS AND PROJECT REQUIREMENTS

We acknowledge that some of our requests are outside the defined scope of the Project (the West Sacramento Broadway Bridge) and its requirements. However, the same has been said for the Broadway Complete Streets Project and the West Broadway Specific Plan. Yet, when taken in aggregate, the cumulative negative impacts of these projects on the Broadway Corridor and its commute connectors are well documented in their FEIRs – resulting in a major challenge to the Community vision and standards of livability addressed in the Sacramento General Plan.