



# REPORT TO PRESERVATION COMMISSION City of Sacramento

# 3

915 I Street, Sacramento, CA 95814-2671

STAFF REPORT  
October 5, 2011

Members of the Preservation Commission

**Subject: I-5 Riverfront Reconnection Project (M11-019)** A request for Preservation Commission Review and Recommendation for the I-5 Riverfront Reconnection (Bridging I-5) Project specifically pertaining to the area related to the Old Sacramento Historic District, consisting of new 2<sup>nd</sup> Street and Capitol Mall intersection and reconfiguration of portions of 2<sup>nd</sup> Street and Neasham Circle. Environmental Determination: Initial Study/Mitigated Negative Declaration.

- A. Preservation Commission review and recommendation for the I-5 Riverfront Reconnection Project specifically pertaining to the area within the Old Sacramento Historic District.

**Location/Council District:**

Public Right of Way area including Front Street on the west to 3<sup>rd</sup> Street on the east, and "O" Street on the south to "L" Street on the north, Sacramento CA  
Council District 1

**Recommendation:** Staff requests the Preservation Commission review and comment on the project and transmit the Commission's recommendations on the project to the City's Department of Transportation, as recommended below.

**Contact:** Jesse Gothan, Associate Engineer, DOT, (916) 808-6897  
Roberta Deering, Senior Planner for Historic Preservation, (916) 808-8259

**Applicant:** City of Sacramento Department of Transportation, 915 I Street, 2<sup>nd</sup> Floor  
New City Hall, Sacramento, CA 95814

**Owners:** City of Sacramento and State of California

**Summary:** The City of Sacramento has been investigating options and means to “bridge I-5” and re-connect Sacramento’s downtown and waterfront areas. The current project represents feasible – both technologically and economically – elements to help repair these connections and reconnect at least parts of “the grid.” City Staff is asking the Preservation Commission, based upon the Historic Preservation Chapter of the City Code relative to Commission review of projects involving the Old Sacramento Historic District (Old Sacramento,) as well as the Commission’s review and comment role in federal undertakings based upon the City’s Certified Local Government program, to review and comment the I-5 Riverfront Reconnection Project.

**Background Information:** The Riverfront Reconnection project, also known as the Bridging I-5 project, has had an extensive public process dating back to 2003. When Interstate 5 (I-5) was built in the 1960s, the riverfront was virtually cut off from downtown, isolating the community from its historic origin and the river. Portions of Old Sacramento were spared, and listed as a National Historic Landmark Historic District in the National Register of Historic Places, though I-5 created a barrier – with both a below-grade cut and an elevated structure – between Old Sacramento and the rest of the downtown. The Riverfront Reconnection project has studied various alternatives to reconnect the downtown business district with the riverfront, in particular in those areas where I-5 is depressed below grade. Specific goals of the project were:

- Regain access to the river and reconnect downtown to the river
- Create a balance in land uses
- Create economic opportunity
- Mitigate some of the environmental impacts from I-5

In July 2003, the City Council approved a professional service agreement with a consulting team to complete a Caltrans Project Study Report (PSR) and Environmental Documentation for a project to bridge I-5. Such a project would compliment planned riverfront development (such as the Docks and the Crocker Art Museum Expansion.) The project would also improve vehicular and pedestrian/bicycle mobility by expanding the downtown’s historic street grid impacted by the construction of I-5.

The original “Bridging I-5” proposals envisioned decking across the below grade section (“boat section”) of I-5, and providing a park and/or commercial buildings over this segment of the freeway and overcoming the barrier to local connectivity created by the construction of I-5. This project developed over several public meetings and extensive coordination and briefings with stakeholder organizations, including three design charettes, five public meetings/open houses/events, three stakeholder focus groups/roundtables, and more than 30 stakeholder entity briefings. Beginning with approximately 36 alternatives, the project was narrowed to six alternatives (three full-deck options and three minimal-deck options) that met the defined purpose and need developed through the public process: to support the proposed land uses in the project area by improving local circulation of motorized and non-motorized traffic. Following

acceptance of these six alternatives by City Council in September 2004, more detailed technical analysis was conducted and the concepts were further screened to three alternatives. As required by FHWA for federal funds, a value analysis study was completed in 2008. The study ultimately concluded that a decking project would not be financially feasible because the cost of the investment could not be repaid by building leases or sales on the deck. The prospect of private development or federal dollars funding that scale of project was not apparent. In October 2009, the City Council received these findings and directed Staff to move forward with environmental documentation for the minimal third alternative.

The third alternative, with estimated construction cost at approximately \$36.5 million, provides the circulation benefits by connecting the public streets between the downtown to the riverfront, but it does not have the significant costs associated with the decking alternatives that were estimated at over \$100 million. The third alternative improves access in the area from the Crocker Art Museum to Old Sacramento, Capitol Mall, and between Front Street and 3<sup>rd</sup> Street by providing a new bridge at N Street over I-5, new sidewalks/streetscape improvements on "O" Street and Capitol Mall, and highlighted by a new gateway intersection into Old Sacramento from Capitol Mall at 2<sup>nd</sup> Street.

City Department of Transportation (DOT) Staff moved forward in 2010 preparing the California Environmental Quality Act (CEQA) and National Environmental Protection Act (NEPA) documents and the Caltrans project report; the project report was approved by Caltrans in June 2011. Renderings of the third alternative were presented to the Old Sacramento Business Association (OSBA) in November 2010, followed by a public open house depicting project renderings. Staff received comments and returned to the OSBA in July of 2011 where the OSBA approved a motion in support of the project. A public meeting was held on August 17<sup>th</sup>, 2011, to solicit comments from the public regarding the third alternative. The circulation period closed on August 31, 2011, and there were a total of twelve comments received, which comments and responses are included in the environmental documents, internet links to which are included in this report, below.

**Proposed Project Relative to Old Sacramento:** The Third Alternative project objectives are:

- Reconnect the Capitol Mall area, the Crocker Art Museum area, the Sacramento Riverfront area, the West Sacramento Riverfront area, and the Old Sacramento Historic District so they function as a single mixed-use location;
- Improve pedestrian and bicycle facilities by filling in gaps in the existing road and sidewalk grid and by upgrading existing pedestrian and bicycle facilities to encourage non-motorized trips;
- Facilitate future development/land use along the Riverfront in support of the general land use strategy contained in the City's Riverfront "Master Plan" by providing improved multi-modal circulation.

The Third Alternative project needs are:

- Pedestrian facilities over I-5 are limited to the newly converted "R" Street bicycle and pedestrian bridge, and sidewalks on the "O" Street and Capitol Mall bridges over I-5. The "K" Street pedestrian tunnel and "I" Street undercrossing also provide pedestrian connections to Old Sacramento from the rest of downtown, however these facilities lack amenities that would help encourage their use, and public safety is compromised in some of these pedestrian areas due to isolation of the facility and lack of adequate lighting.
- There are no dedicated bicycle facilities within the project area, other than the bike path along the east bank of the Sacramento River in the southern portion of the project area, and the newly converted "R" Street bicycle and pedestrian bridge over I-5 south of the project area. Bicyclists must use the same intersections as vehicles and there is a need to provide alternative paths that would allow bicyclists to bypass congested intersections.
- Downtown Sacramento and the Riverfront/Old Sacramento areas are separated by the existing transportation network, which was designed as part of the construction of I-5. There is a need to reconnect the street grid in order to increase accessibility throughout the project area, including to Old Sacramento on the Riverfront from the rest of the downtown area, and to distribute the traffic more evenly to minimize undesirable concentrations from future planned growth.

The proposed project relative to Old Sacramento involves the district's southeast corner, that area of the historic district that reflects impacts of the construction of I-5. A new intersection to connect 2<sup>nd</sup> Street with Capitol Mall and south to Front Street would be constructed. To accommodate the new intersection, the project would reconfigure Neasham Circle (built to provide access under the Capitol Mall "bridge" over I-5, between Front Street and 2<sup>nd</sup> Street north of Capitol Mall, and to Front Street south of Capitol Mall) limiting vehicular access in the area under the Capitol Mall bridge. The new intersection would reconfigure 2<sup>nd</sup> Street from approximately "L" Street south and provide a new 2-way road and single sidewalk connection up to Capitol Mall. As it appears today, the portion of 2<sup>nd</sup> Street from "L" Street south represents that portion which was reconfigured as part of the I-5 construction project, with a sloping grade down to connect under the then-new Capitol Mall "bridge" at Neasham Circle. East of this portion of 2<sup>nd</sup> Street, aside from a small landscaped area (space created from the construction of I-5,) the depressed "boat section" portion of I-5 is visible as is the Capitol Mall "bridge" above. NOTE: the original grade of 2<sup>nd</sup> Street could not be extended south from "L" Street since the Capitol Mall bridge was built approximately four feet above that grade.

In addition to the new 2<sup>nd</sup> Street/Capitol Mall/Front Street intersection, Capitol Mall from 3<sup>rd</sup> Street through this new intersection would be reconfigured to provide for wider sidewalks, Class II bicycle facilities (bike lanes,) two traffic lanes in each direction, and a center median. For the Capitol Mall bridge section over I-5, these improvements could be accommodated within the current structure and the bridge would not need to be widened. A new signalized intersection with separate left-turn lanes would be

constructed at the new Front Street/2<sup>nd</sup> Street intersection with Capitol Mall. This intersection would provide access north into Old Sacramento via a reconfigured 2<sup>nd</sup> Street and would provide access south towards "N" Street via a reconfigured Front Street.

**Environmental Considerations:** The Initial Study prepared for the project determined that the proposed project is an anticipated subsequent project of the 2030 General Plan Master EIR, that the proposed project is consistent with the 2030 General Plan of use for the project site, that the discussions of cumulative impacts, growth-inducing impacts, and irreversible significant effects in the Master EIR are adequate for the proposed project, and that the proposed project would have additional significant environmental effects not previously examined in the Master EIR. A Mitigated Negative Declaration was prepared and circulated for public review for a 30-day period from August 1, 2011 to August 31, 2011.

Staff received twelve comment letters regarding the project during the public review period. The inquiries generally related to project design, project components, and other agency jurisdictional requirements, and not issues of the environmental document. A few comments were specific to clarification of contents of the environmental document. The comments received and responses are provided in a separate attachment to the staff report (Attachment 2.) The comments raised do not change the environmental determination made in the Initial Study and Draft Mitigated Negative Declaration. The Environmental Services Manager has determined that adoption of the Mitigated Negative Declaration and Mitigation Monitoring Program are appropriate actions under the California Environmental Quality Act (CEQA.)

Preservation Staff notes that the area of the Project in Old Sacramento has seen considerable disturbance from the 1960s construction of I-5, in terms of both built-environment resources – buildings, street grid, street grades, historic district environment – as well as archaeological resources – historic and prehistoric. See links below for the environmental documents pertaining to the project.

**Policy Considerations:** The City of Sacramento's 2030 General Plan designated the project site as Traditional Center, Central Business District, Public/Quasi-Public, and Parks and Recreation. The project site is zoned as C-3-SPD and C-3 (Central Business District zone-Special Planning District,) and M-1 (Light Industrial Zone.)

The proposed project is currently programmed in the Sacramento Area Council of Government's (SACOG) Metropolitan Transportation Plan 2035 (MTP.) The Interstate 5 Riverfront Reconnection has a total budget of \$5,330,512, consisting of local transportation funds, Tax Increment provided by Economic Development, Federal funds and State funds. As of September 19, 2011, the unobligated balance is \$537,902. Approval of the additional \$199,474 from the 11<sup>th</sup> Street and 12<sup>th</sup> Street Improvements Project will increase the unobligated balance to \$737,376, which is sufficient to complete final design.

2030 General Plan Goals and Policies

Staff finds the project is generally consistent with the 2030 General Plan relative to the following Land Use & Urban Design, Historic & Cultural Resources, and Mobility General Plan Goals and Policies:

- The City shall strive to remove and minimize the effect of natural and manmade barriers to accessibility between and within existing neighborhoods, corridors, and centers. (LU 2.5.2)
- The City shall promote better connections by all travel modes between residential neighborhoods and key commercial, cultural, recreational and other community-supportive destinations for all travel modes. (LU 4.1.5)
- The City shall review proposed new development, alterations, and rehabilitation/remodels for compatibility with the surrounding historic context. The City shall pay special attention to the scale, massing, and relationship of proposed new development to surrounding historic resources (HCR 2.1.11)
- The City shall eliminate “gaps” in roadways, bikeways, and pedestrian networks. ...b. The City shall plan and seek funding to construct grade-separated crossings of freeways, rail lines, canals, creeks and other barriers to improve connectivity.
- The City shall support the development and expansion of world-class destination attractions throughout Sacramento including museums, zoos, and the Sacramento River and American River Waterfronts. (ERC 5.1.1)

**Project Design and Staff Evaluation:** With the construction of I-5 having previously seriously disturbed the area of the project within Old Sacramento, particularly 2<sup>nd</sup> Street south of “L” Street, and the area east of 2<sup>nd</sup> Street south of “L” Street, both in terms of physical disturbance – demolition of buildings and changes to original street grade – as well as well as disturbing circulation – cutting off 2<sup>nd</sup> Street from what was originally “M” Street – this project has the potential to begin reconnecting some of the street grid and circulation connections. The project also has the potential to provide a screening benefit, visual as well as noise, from the opening that now exists from the I-5 boat section into that southeast corner of Old Sacramento. In these regards, this portion of the project will help to mitigate some of the impacts from I-5.

### Rehabilitation Standards

The following is the list of the Secretary of the Interior’s Rehabilitation Standards for the Treatment of Historic Properties, with the Standards most applicable to this project **highlighted:**

1. *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.*

2. *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.*
3. *Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.*
4. *Changes to a property that have acquired historic significance in their own right will be retained and preserved.*
5. *Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.*
6. *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*
7. *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*
8. *Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*
9. ***New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.***
10. ***New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.***

The design of the new structure reconfiguring 2<sup>nd</sup> Street should, per Rehabilitation Standard #9 above, be differentiated from the old, yet be compatible with the historic design vocabulary related to materials, features, size, scale and proportion, and massing to protect the historic district's environment. The preliminary concept designs are appropriately based upon brick masonry street-wall construction elements that were used in the 1860s and 1870s to raise downtown's streets. Care must be taken in the final design to ensure this new structure is visually compatible yet differentiated from the old. What remains in the historic district that was not disturbed from I-5 construction will

remain in place. Should this proposed structure be removed in the future, it would re-open this portion of the historic district to the visual and noise impacts from I-5, and return the street grid disconnections caused by the construction of I-5; there would be no additional impacts to the essential form and integrity of the historic district and its environment.

The aesthetic and architectural features of the new structure connecting 2<sup>nd</sup> Street to Capitol Mall are important elements of the proposed project. Preliminary concepts for the aesthetic elements were developed based on initial input from project stakeholders, including Old Sacramento business owners and historic district stakeholders. During final design of the project, the architectural features – design and materials – will be further developed based upon input provided.

Staff also notes care must be taken in the final designs to ensure that operational needs in Old Sacramento, both for private businesses as well as for public programming, be respected. Old Sacramento programming and events that provide visitor experiences interpreting historic periods should not be compromised.

**Staff Recommendation for the Preservation Commission's Comments:** Staff recommends that the Commission, relative to the Old Sacramento portion of the project, recommend that the City Department of Transportation move forward with the project with the following recommendations:

- a) the final designs of the 2<sup>nd</sup> Street intersection structure, which will connect to Capitol Mall, should continue to build upon the proposed preliminary design concepts that use design and materials vocabulary from the significant features, characteristics and spatial relationships found in the Old Sacramento Historic District;
- b) the designs should ensure the continuation and development of high quality historical interpretive and tourism events and programming in Old Sacramento; and
- c) that final designs be coordinated with CDD Preservation Staff, Staff from the Convention Culture and Leisure Department including the City's History Manager, and with Staff from Old Sacramento State Historic Park.

Respectfully submitted by:

  
ROBERTA DEERING  
Senior Planner for Historic Preservation

Recommendation Approved:

  
WILLIAM CROUCH, AIA, FRAIA, NCARB, LEED AP  
Urban Design Manager/Design Director/Preservation Director

Attachments:

Attachment 1- PowerPoint Concerning Project

Page 10

Attachment 2- Comments/Responses on Environmental Documents

Page 31

Note links below to California Environmental Quality Act environmental documents for the project:

Notice of Intent to Adopt – Draft Mitigated Negative Declaration

<http://www.cityofsacramento.org/dsd/planning/environmental-review/eirs/documents/NOINOA.pdf>

Initial Study/Mitigated Negative Declaration

<http://www.cityofsacramento.org/dsd/planning/environmentalreview/eirs/documents/I5RiverfrontReconnectionMND.pdf>

# I-5 Riverfront Reconnection Project

Presented To The Sacramento Preservation Commission

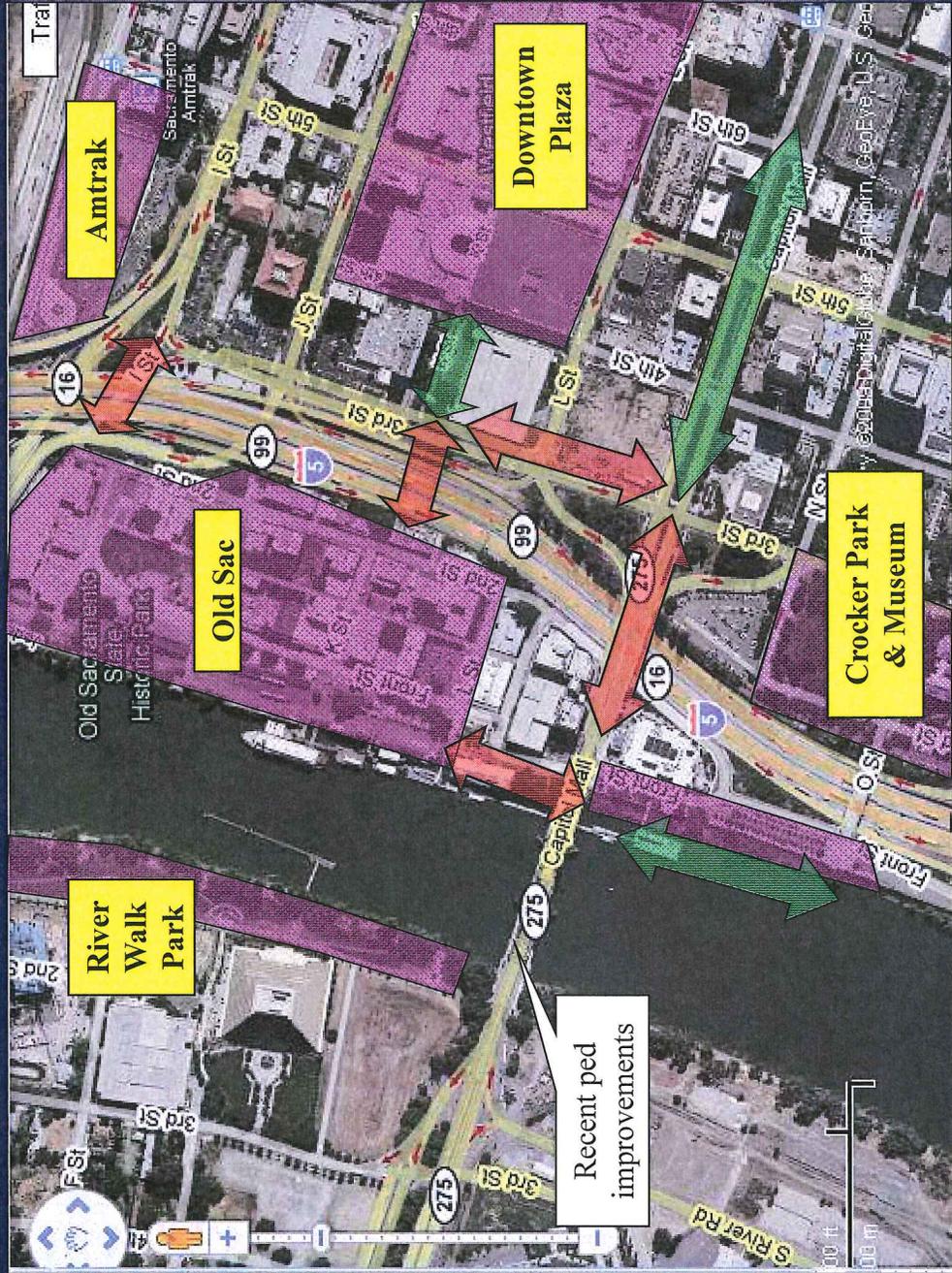


Oct 5, 2011

# Project Purpose

- Increase connectivity
- Encourage and accommodate more pedestrian and bicycle traffic
- Support the goals of the blueprint plan

# A pedestrian's map of the study area



Destination

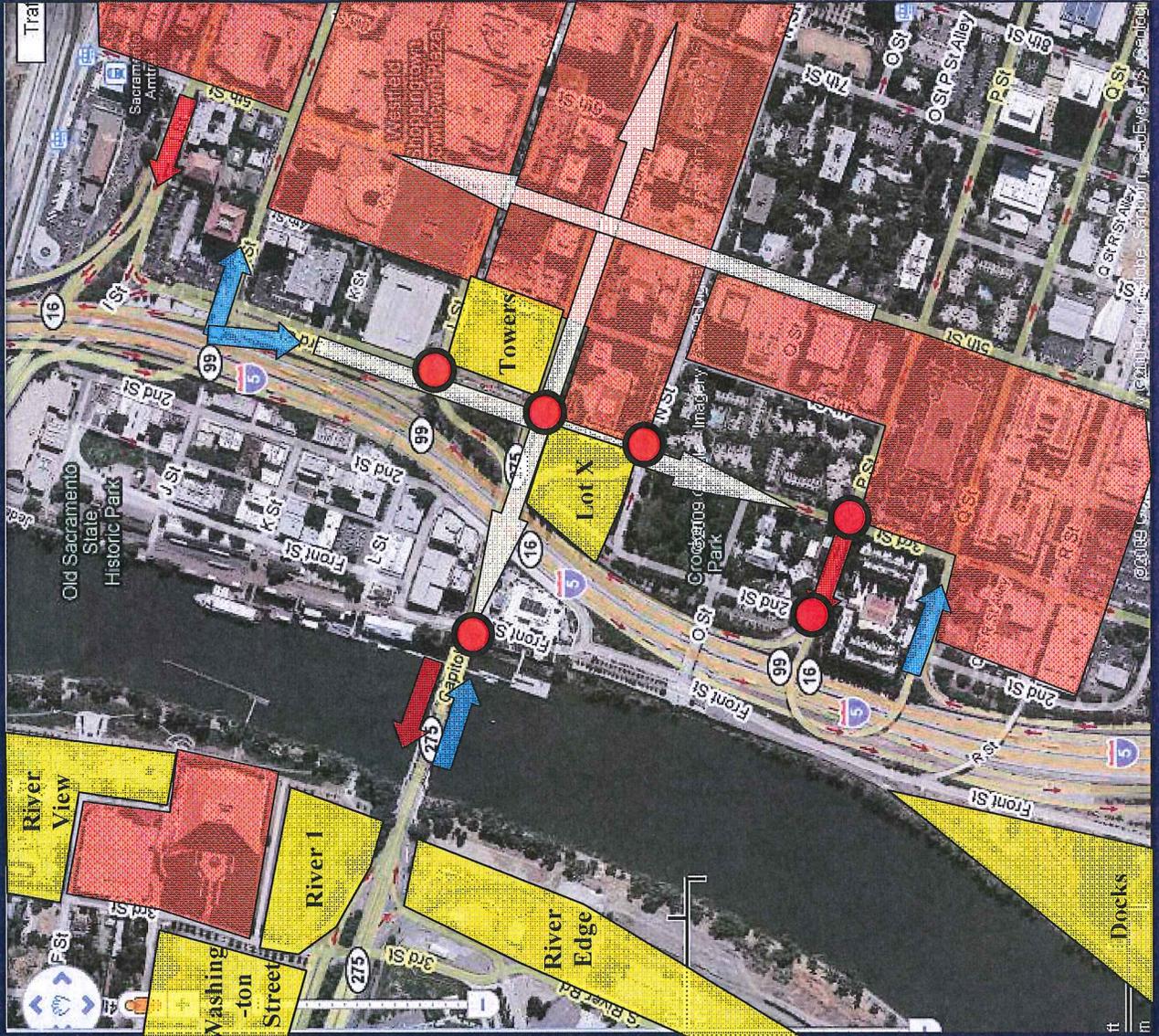


"Nice" Paths



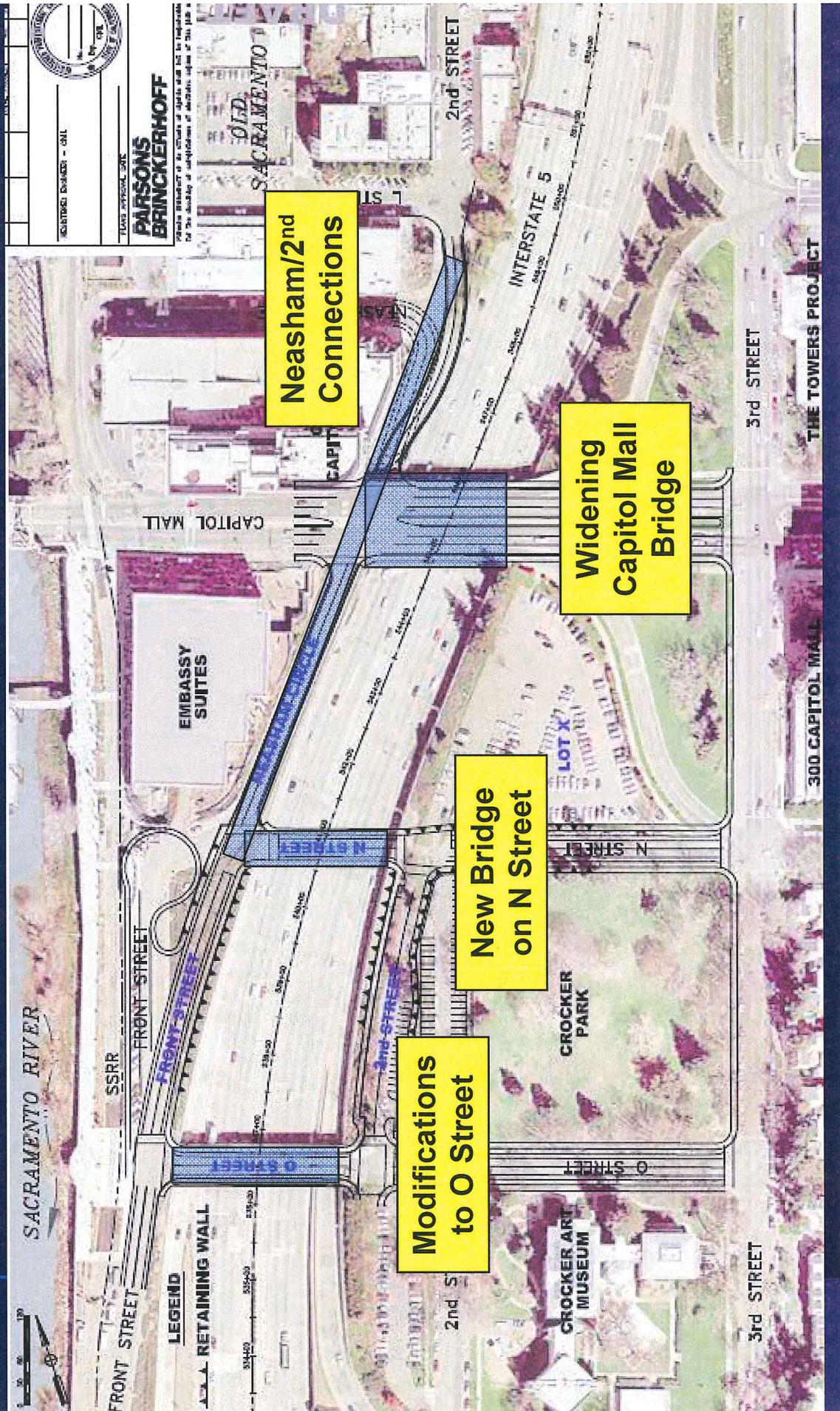
"Not-so-Nice" Paths

# A commuting driver's map of the study area



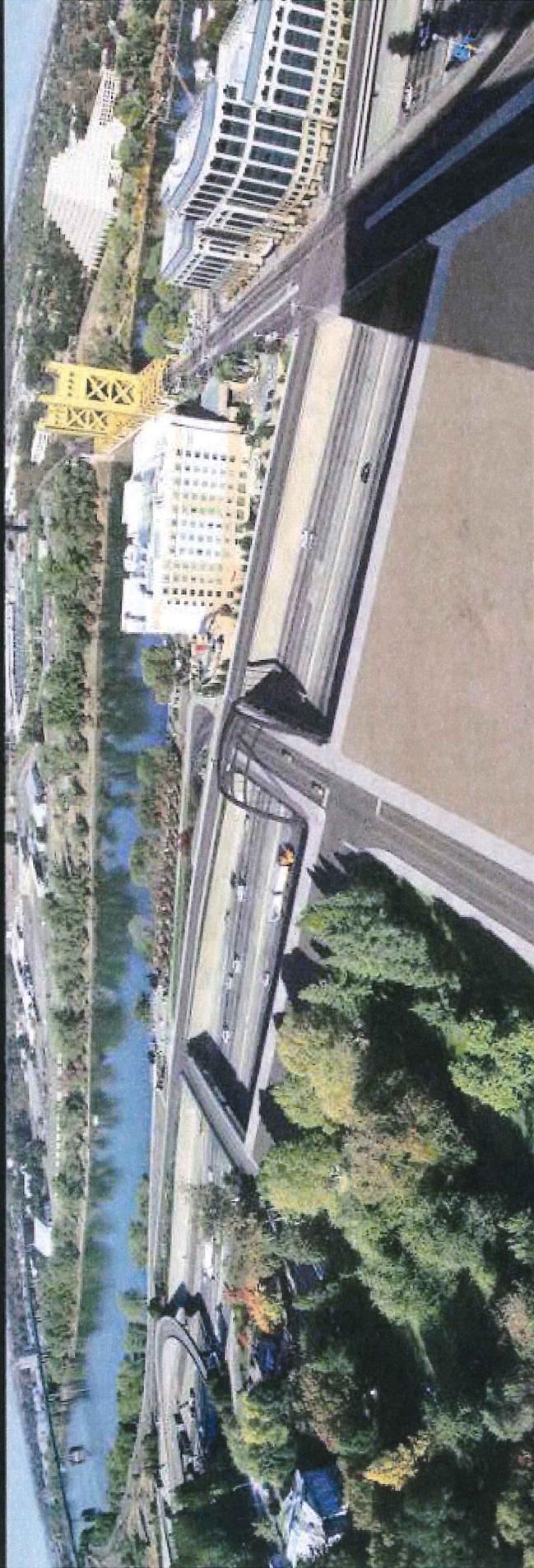
-  Destinations
-  Major Entry
-  Major Exit
-  Collector/Distributor
-  Developments
-  Problems Intersections

# Project Elements



# Project Elements

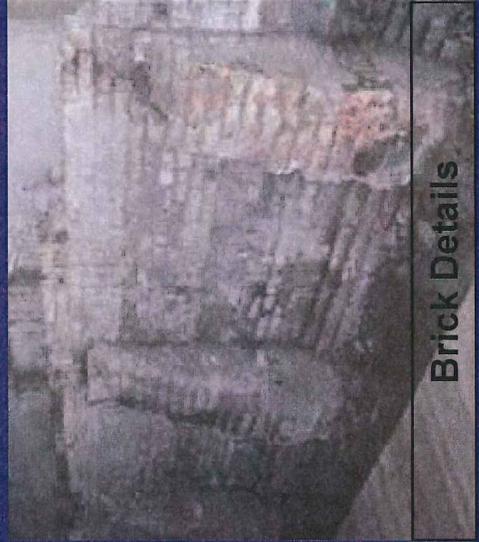
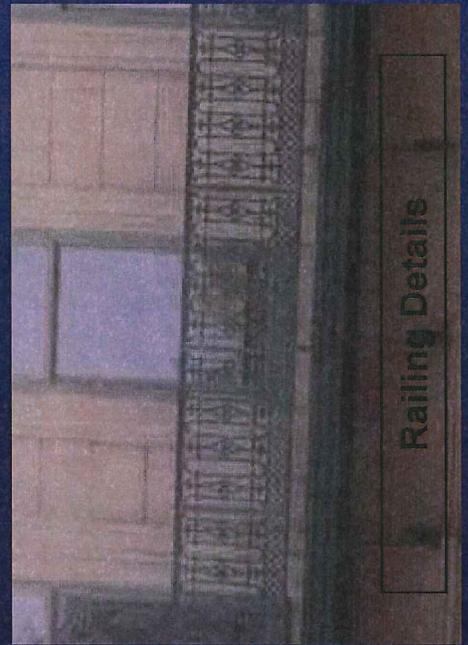
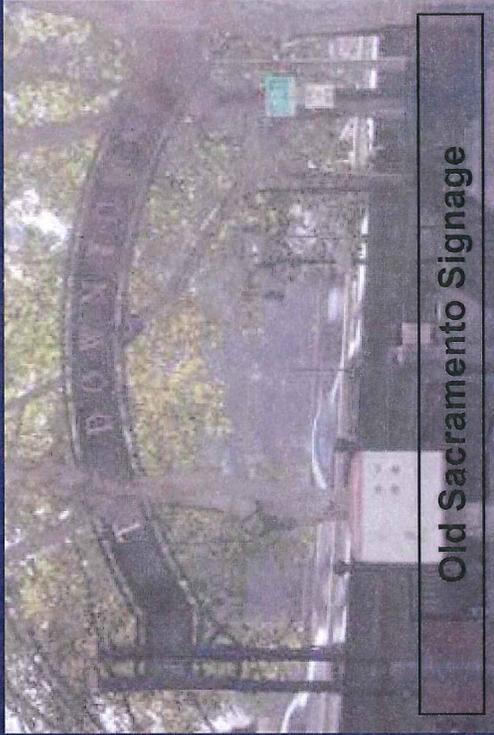
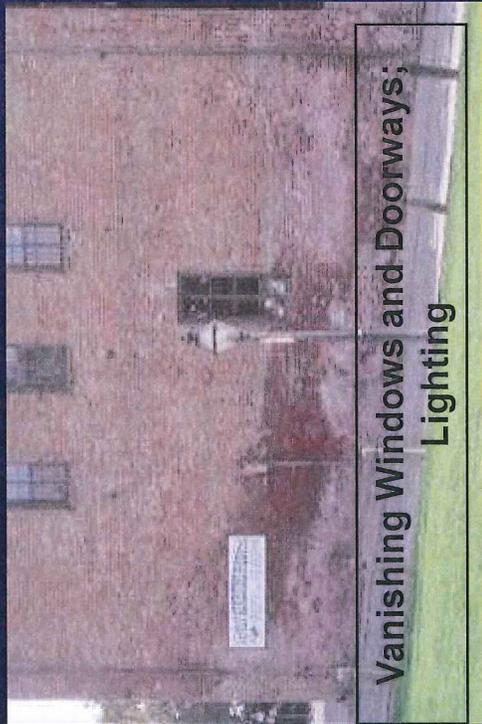
## I-5 RiverFront Reconnection Project - Alternative 3

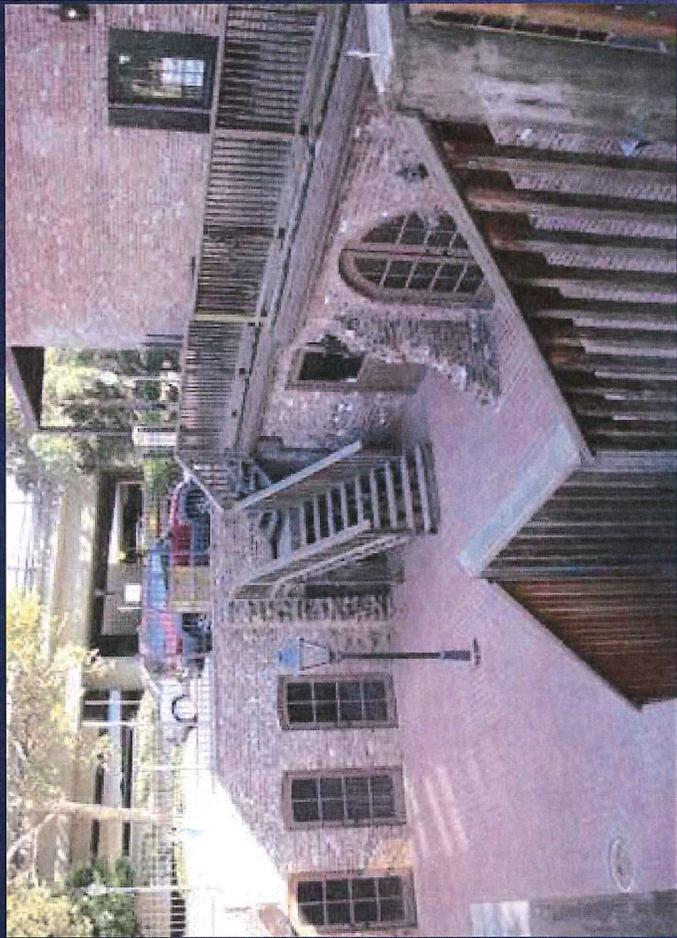
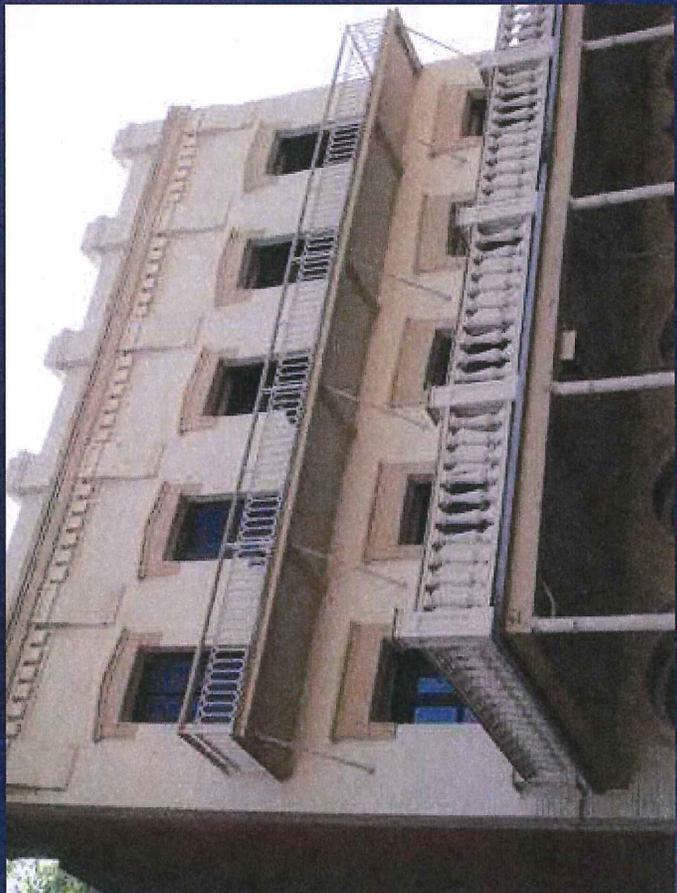


***Visual & Noise  
Consideration***

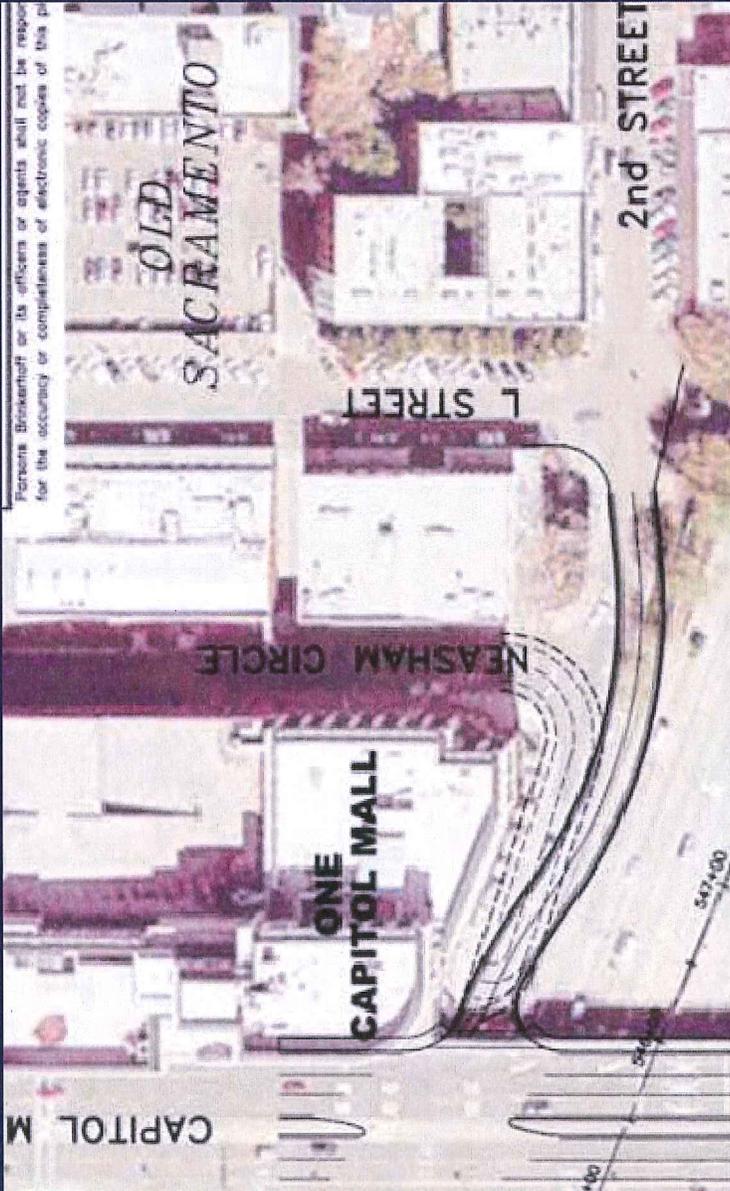
**Connection to Old Sacramento  
@ 2nd Street**

# Potential Architectural Treatments

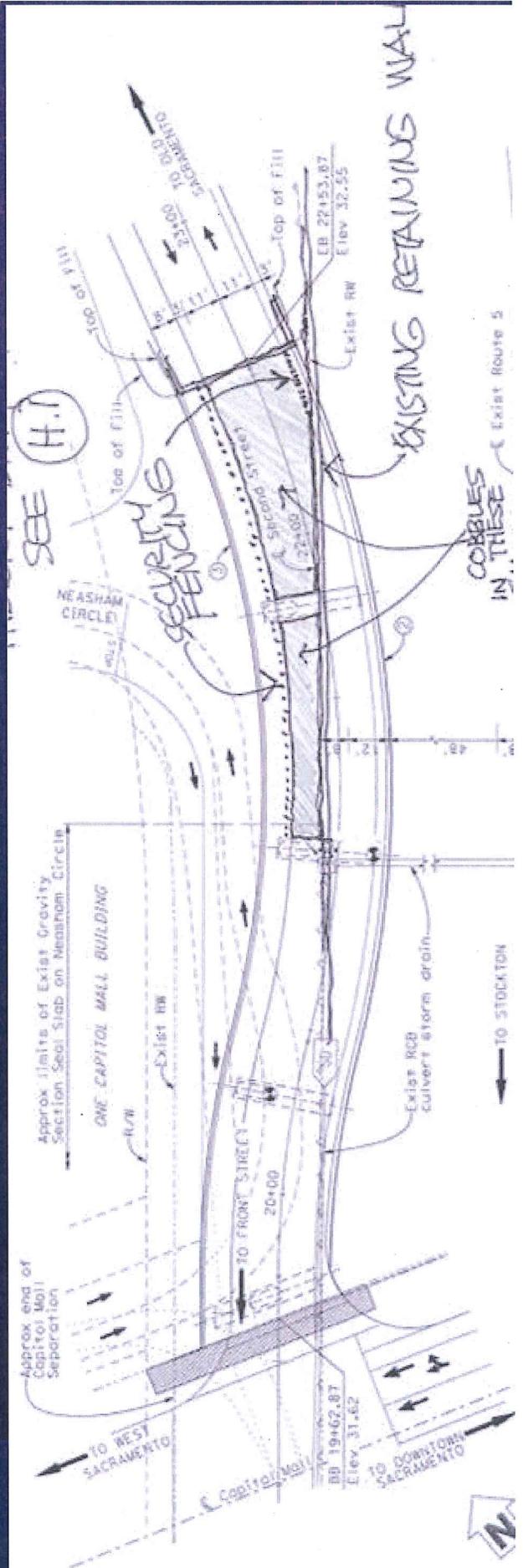




# 2nd Street Connection



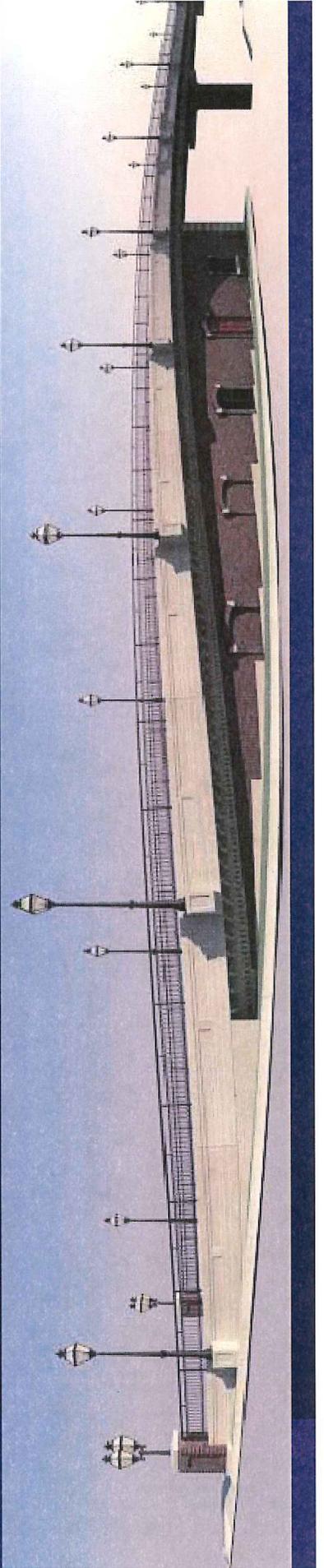
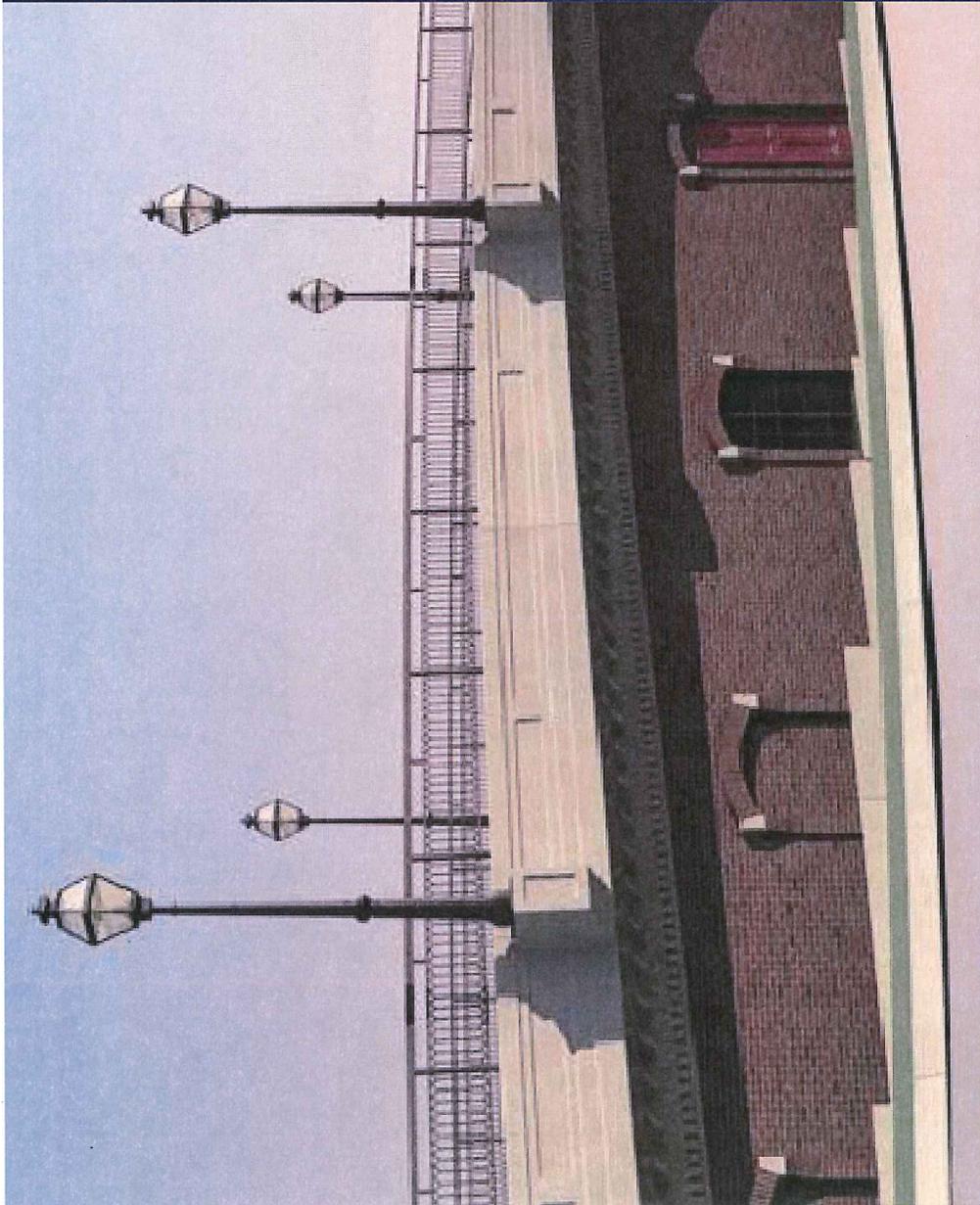
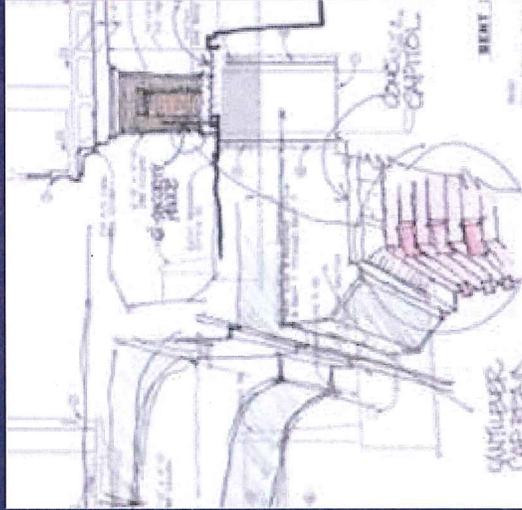
Persons browsing or its officers or agents shall not be responsible for the accuracy or completeness of electronic copies of this plan.



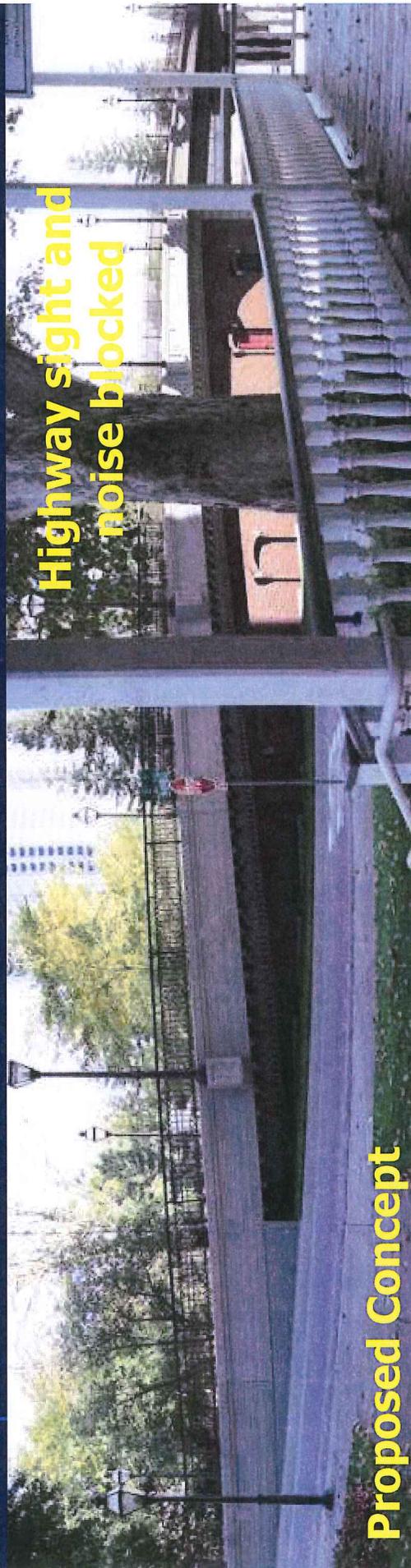
# 2nd Street @ Neasham Circle



# 2nd Street Connection

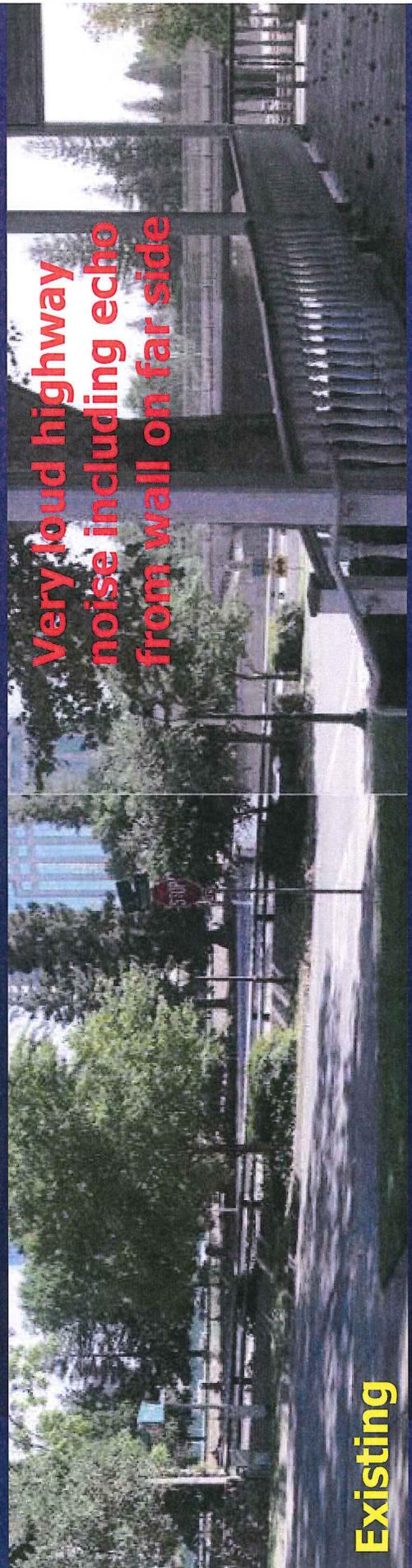


# 2nd Street Connection @ Neasham Circle



**Proposed Concept**

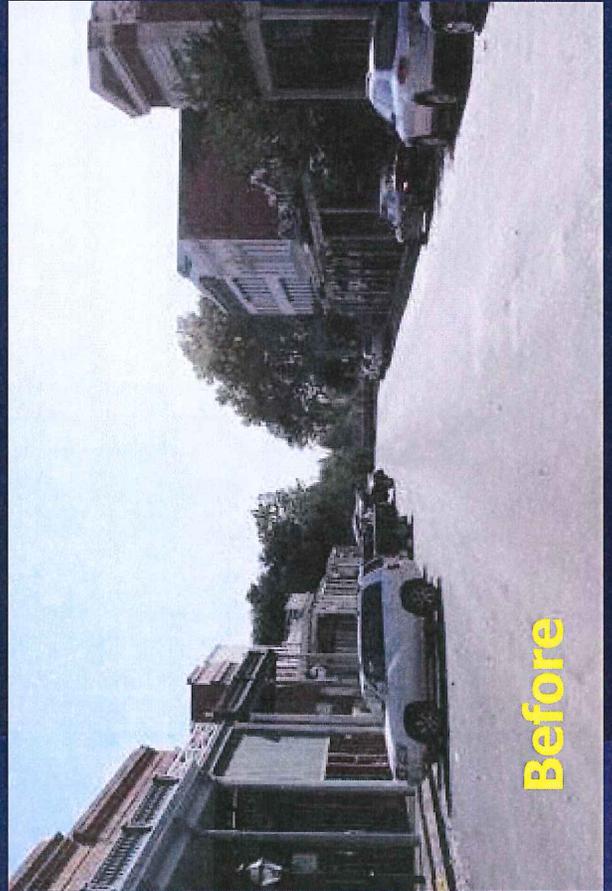
**Highway sight and  
noise blocked**



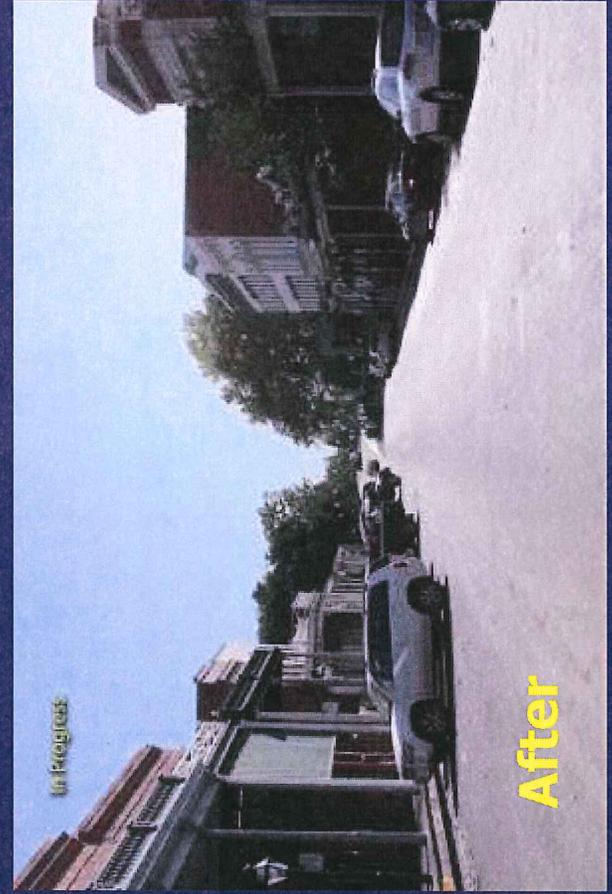
**Existing**

**Very loud highway  
noise including echo  
from wall on far side**

# 2nd Street Connection @ K Street

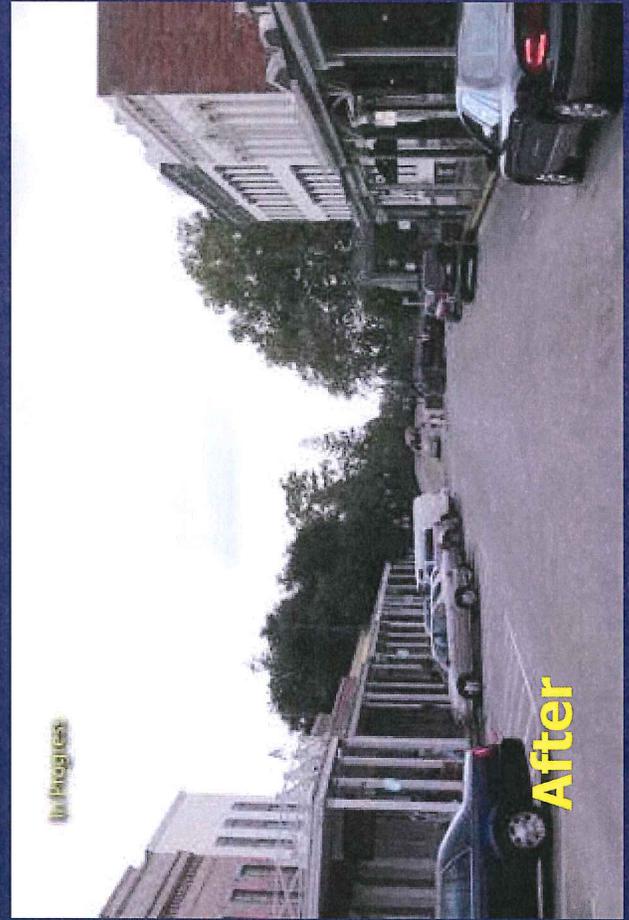
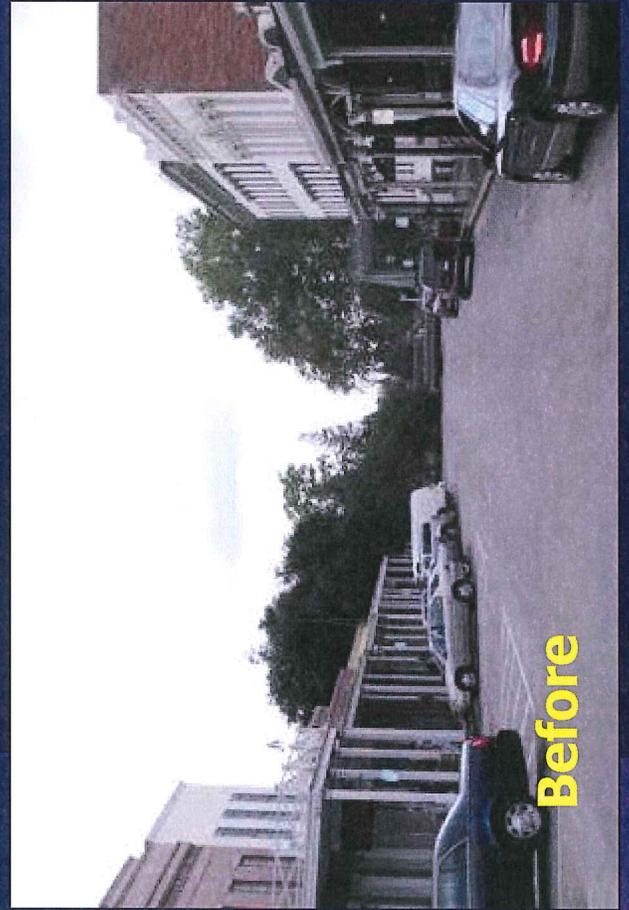


**Before**

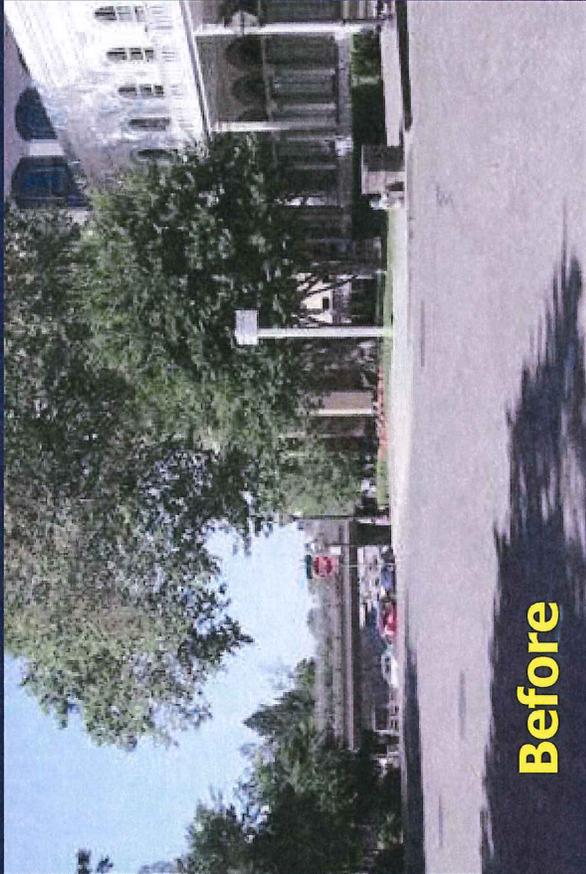


**After**

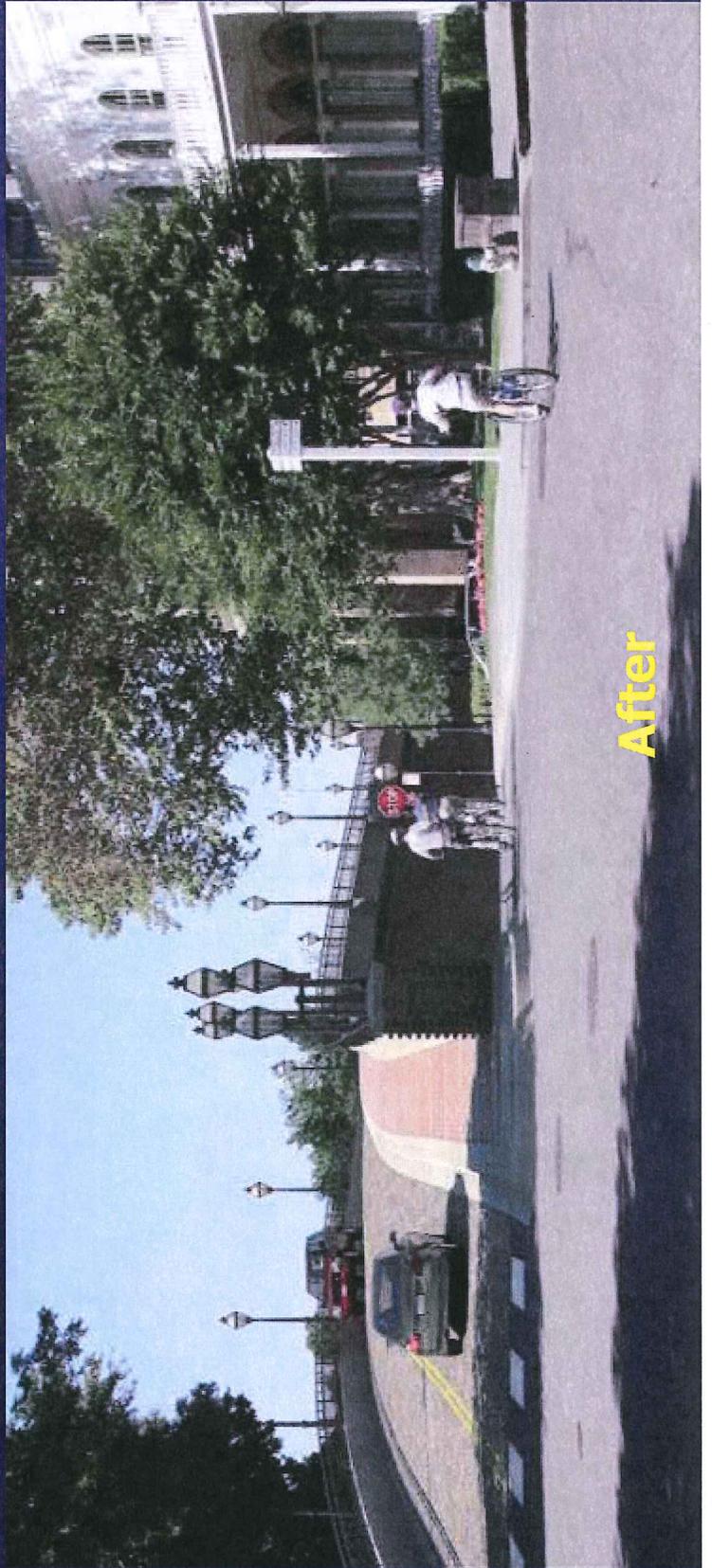
# 2nd Street Connection mid block



# 2nd Street @ L Street

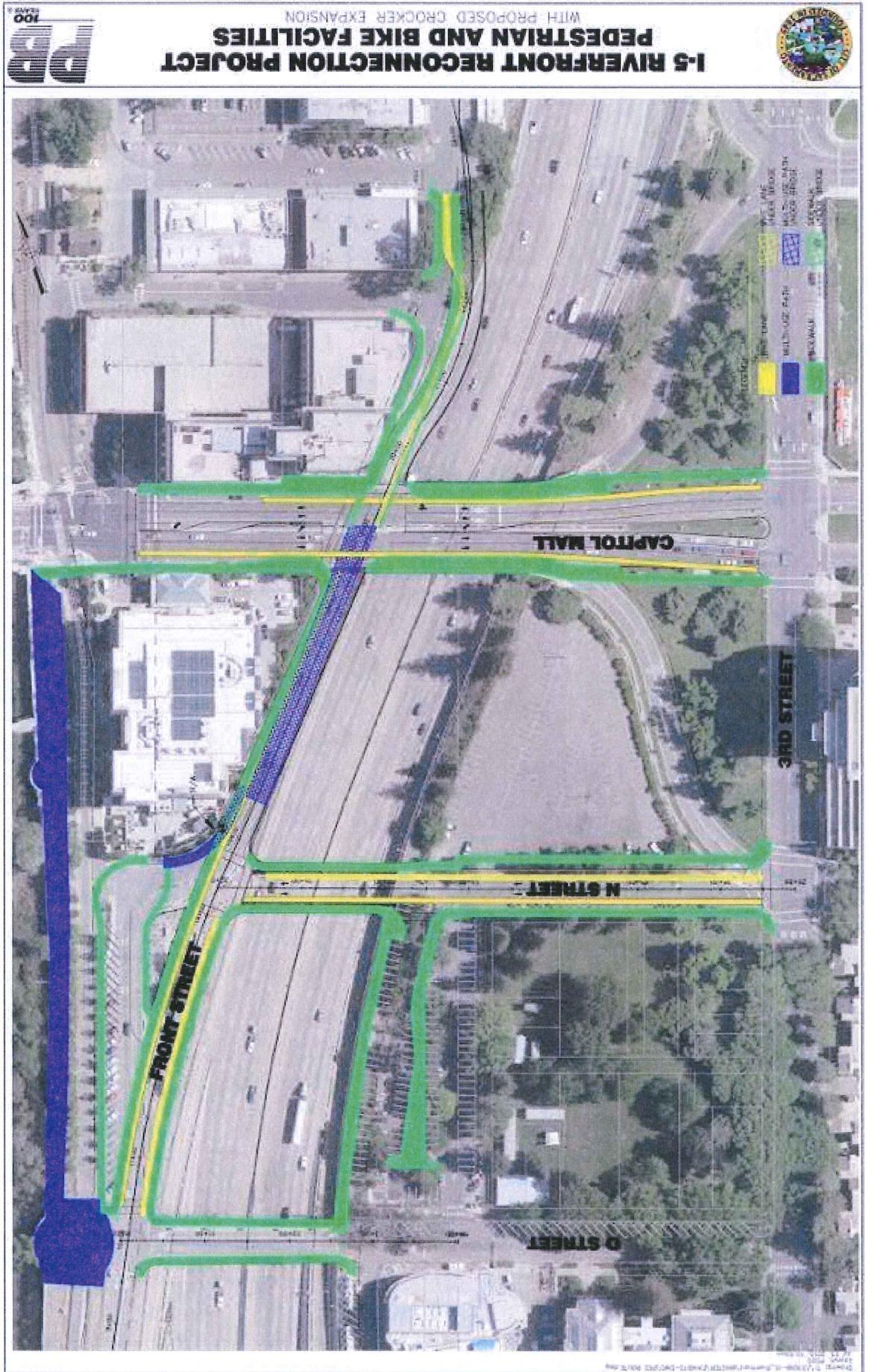


Before



After

# Alternative 3-Ped & Bike paths



# Front Street and N Street

In Progress



# Capital Mall



# O street Sidewalk Widening



# *Questions & Answers*

I-5 Riverfront Reconnection Project  
Draft IS/MND Comments Received

Responses to Written Comments Received

Agencies, organizations, and individuals that commented in writing on the Draft Initial Study/Mitigated Negative Declaration are listed below in Table 1-1. Comment letters were solicited during the 30-day public review, which extended from August 1, 2011 to August 31, 2011. The comment letters are included along with responses corresponding to the Letter ID#.

**Table 1-1. Comment Letters**

<b>ID #</b>	<b>Name</b>	<b>Date</b>
<b>Public Agencies</b>		
PA1	Central Valley Flood Protection Board	08/05/11
PA2	California Regional Water Quality Control Board, Central Valley	08/17/11
PA3	Caltrans	08/17/11
PA4	Sacramento Regional County Sanitation District	08/17/11
PA5	State of California Public Utilities Commission	08/26/11
PA6	State of California Department of Parks and Recreation	08/31/11
<b>Local Organizations</b>		
LO1	PG&E	08/05/11
LO2	Sacramento Area Bicycle Advocates	08/23/11
LO3	Riverfront Plaza Association	08/30/11
LO4	Walk Sacramento	08/31/11
<b>Individual Parties</b>		
IP1	Keith Jones	08/17/11
IP2	Steve Mammet, Embassy Suites	08/29/11

**CENTRAL VALLEY FLOOD PROTECTION BOARD**

3310 El Camino Ave., Rm. 151  
SACRAMENTO, CA 95821  
(916) 574-0609 FAX: (916) 574-0682  
PERMITS: (916) 574-2380 FAX: (916) 574-0682



August 5, 2011

Mr. Scott Johnson  
City of Sacramento  
Community Development Department  
300 Richards Boulevard  
Sacramento, California 95811

Subject: Response to the Notice of Availability/Intent to Adopt – Draft Mitigated  
Negative Declaration for the I-5 Riverfront Reconnection Project (T15998100)  
SCH: 2011082001

Dear Mr. Johnson:

Staff of the Central Valley Flood Protection Board (Board) has reviewed the subject document and provides the following comments:

The proposed project is located within the jurisdiction of the Central Valley Flood Protection Board. The Board is required to enforce standards for the construction, maintenance, and protection of adopted flood control plans that will protect public lands from floods. The jurisdiction of the Board includes the Central Valley, including all tributaries and distributaries of the Sacramento River and the San Joaquin River, and designated floodways (Title 23 California Code of Regulations (CCR), Section 2).

A Board permit is required prior to starting the work within the Board's jurisdiction for the following:

- The placement, construction, reconstruction, removal, or abandonment of any landscaping, culvert, bridge, conduit, fence, projection, fill, embankment, building, structure, obstruction, encroachment, excavation, the planting, or removal of vegetation, and any repair or maintenance that involves cutting into the levee (CCR Section 6);
- Existing structures that predate permitting, or where it is necessary to establish the conditions normally imposed by permitting. The circumstances include those where responsibility for the encroachment has not been clearly established or ownership and use have been revised (CCR Section 6);
- Vegetation plantings will require the submission of detailed design drawings; identification of vegetation type; plant and tree names (i.e. common name and scientific name); total number of each type of plant and tree; planting spacing and irrigation method that will be utilized within the project area; a complete vegetative management plan for maintenance to prevent the interference with flood control, levee maintenance, inspection and flood fight procedures (CCR Section 131).

Comment Letter: PA1

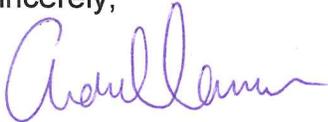
Mr. Scott Johnson

August 4, 2011

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If you have any questions, please contact me via email at [amauro@water.ca.gov](mailto:amauro@water.ca.gov).

Sincerely,



Andrea Mauro  
Environmental Scientist  
Flood Projects Improvement Branch

cc: Governor's Office of Planning and Research  
State Clearinghouse  
1400 Tenth Street, Room 121  
Sacramento, California 95814



**California Regional Water Quality Control Board**  
**Central Valley Region**  
**Katherine Hart, Chair**



**Matthew Rodriguez**  
*Secretary for*  
*Environmental Protection*

11020 Sun Center Drive, #200, Rancho Cordova, California 95670-6114  
(916) 464-3291 • FAX (916) 464-4645  
<http://www.waterboards.ca.gov/centralvalley>

**Edmund G. Brown Jr.**  
*Governor*

17 Augusts 2011

Scott Johnson  
City of Sacramento  
300 Richards Boulevard  
Sacramento, CA 95811

CERTIFIED MAIL  
7010 3090 0000 5045 4587

**COMMENTS TO DRAFT MITIGATED NEGATIVE DECLARATION, I-5 RIVERFRONT RECONNECTION PROJECT, SCH NO. 2011082001, SACRAMENTO COUNTY**

Pursuant to the State Clearinghouse's 1 August 2011 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Draft Mitigated Negative Declaration* for the I-5 Riverfront Reconnection Project, located in Sacramento County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

**Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml)

**Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the

<sup>1</sup> Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/municipal\\_permits/](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/)

### **Industrial Storm Water General Permit**

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 97-03-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/industrial\\_general\\_permits/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml).

### **Clean Water Act Section 404 Permit**

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed for the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916)557-5250.

### **Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACOE permit, or any other federal permit, is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. Water Quality Certification must be obtained prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

### **Waste Discharge Requirements**

If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project will require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

I-5 Riverfront Reconnection Project  
SCH No. 2011082001  
Sacramento County

-3-

17 August 2011

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/water\\_quality\\_certification/](http://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/)

If you have questions regarding these comments, please contact me at (916) 464-4745 or [gsparks@waterboards.ca.gov](mailto:gsparks@waterboards.ca.gov).



Genevieve (Gen) Sparks  
Environmental Scientist  
401 Water Quality Certification Program

cc: State Clearinghouse Unit, Governor's Office of Planning and Research, Sacramento

**Scott Johnson**

---

**From:** Ken Lastufka [ken\_lastufka@dot.ca.gov]  
**Sent:** Wednesday, August 17, 2011 9:25 AM  
**To:** MKK@pbsj.com; fran.ruger@ascentenvinc.com  
**Cc:** Scott Johnson  
**Subject:** Fw: I-5 Reconnection Project

**Importance:** High

Hi Michael, Fran:

One of our cultural staff has a comment on the MND. I'll just forward it to you as an email:

Please provide a visual simulation of the new bridge proposed at N Street. Provide a visual simulation similar to what is provided in the document for Capitol Mall and O Street. Please provide plans for the proposed design including the proposed elevation and style of the new bridge.

Please contact me if you have any questions.

Thanks.

Ken Lastufka  
Associate Environmental Planner  
Caltrans, District 3  
2379 Gateway Oaks Drive, Suite 150  
Sacramento, CA 95833  
(916) 274-0586  
FAX (916) 274-0602



Technology in balance with nature

**Main Office**

**10060 Goethe Road**

**Sacramento, CA 95827-3553**

**Tele: [916] 876-6000**

**Fax: [916] 876-6160**

August 17, 2011

Scott Johnson  
Associate Planner  
City of Sacramento  
Community Development Department  
300 Richards Blvd.  
Sacramento, CA 95811

**Sacramento Regional Wastewater Treatment Plant**

**8521 Laguna Station Road**

**Elk Grove, CA 95758-9550**

**Tele: [916] 875-9000**

**Fax: [916] 875-9068**

**Subject: Notice of Availability/Intent to Adopt – Draft Mitigated Negative Declaration for the I-5 Riverfront Reconnection Project (T15998100)**

Dear Mr. Johnson:

The Sacramento Regional County Sanitation District (SRCSD) has reviewed the Notice of Availability for the I-5 Riverfront Project and has the following comments:

Please change paragraph 1 on Page 88 to read as follows:

*Sewage is routed from the City's local collection systems to the Sacramento Regional Wastewater Treatment Plant by large pipelines, called interceptors that are owned and operated by SRCSD. The SRWTP is a high-purity oxygen activated sludge facility and is permitted to treat an average dry weather flow (ADWF) of 181 million gallons per day (MGD). The facility's ADWF is approximately 141 MGD.*

Since the proposed project does not change any land uses or population changes and there is no additional demand for wastewater services, SRCSD has no further comments at this time.

If you have any questions regarding these comments, please contact me at (916) 876-9994.

Sincerely,

Sarena Moore, PE  
SRCSD  
Policy and Planning

**Board of Directors**

Representing:

County of Sacramento

County of Yolo

City of Citrus Heights

City of Elk Grove

City of Folsom

City of Rancho Cordova

City of Sacramento

City of West Sacramento

Stan Dean  
District Engineer

Ruben Robles  
Director of Operations

Prabhakar Somavarapu  
Director of Policy & Planning

Karen Stoyanowski  
Director of Internal Services

Joseph Maestretti  
Chief Financial Officer

Claudia Goss  
Public Affairs Manager

Cc: SRCSD Development Services  
SASD Development Services  
Michael Meyer  
Dave Ocenosak  
Prabhakar Somavarapu

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 26, 2011

Mr. Scott Johnson  
City of Sacramento  
300 Richards Boulevard  
Sacramento, Ca 95811

Re: Notice of Completion, Mitigated Negative Declaration (MND)  
I-5 Riverfront Reconnection Project  
SCH# 2011082001

Dear Mr. Johnson:

As the state agency responsible for rail safety within California, the California Public Utilities Commission (CPUC or Commission) recommends that development projects proposed near rail corridors be planned with the safety of these corridors in mind. New developments and improvements to existing facilities may increase vehicular traffic volumes, not only on streets and at intersections, but also at at-grade highway-rail crossings. In addition, projects may increase pedestrian traffic at crossings, and elsewhere along rail corridor rights-of-way. Working with CPUC staff early in project planning will help project proponents, agency staff, and other reviewers to identify potential project impacts and appropriate mitigation measures, and thereby improve the safety of motorists, pedestrians, railroad personnel, and railroad passengers.

The proposed project does not affect any current rail systems. However, it does *not* address the current plans to run trolleys over the Tower Bridge on Capital Ave.

While there is currently no rail service affected by this project, the Cities of Sacramento and West Sacramento have plans to restore trolley service between the two cities. The proposed trolley route along Capital Ave over the Tower Bridge will run through the proposed I-5 Riverfront Reconnection project. These two projects will have a significant impact on the other and both must be taken into account during all future planning.

The proposed construction of track across roadways will require authorization of CPUC. CPUC needs to be identified as a permitting authority in all project documentation. The construction of a new rail transit extension requires a *Safety Certification Plan* to be approved by the CPUC as the State Safety Oversight Agency for rail transit systems.

Please continue to work with CPUC staff during the course of this project as General Order 88-B authorization and formal Application may be required with appropriate CEQA certification for CPUC approval.

Comment Letter: PA5

Scott Johnson  
SCH # 2011082001  
August 26, 2011  
Page 2 of 2

Thank you for your consideration of these comments. If you have any questions, please contact Dave Stewart at (916) 928-2515 or email at [ATM@cpuc.ca.gov](mailto:ATM@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Moses Stites". The signature is written in a cursive, flowing style.

Moses Stites  
Rail Corridor Safety Specialist  
Consumer Protection and Safety Division  
Rail Transit and Crossings Branch  
180 Promenade Circle, Suite 115  
Sacramento, CA 95834-2939



August 31, 2011

VIA E-MAIL AND U.S. MAIL

City of Sacramento  
Community Development Department  
Attn: Scott Johnson, Associate Planner  
300 Richards Boulevard  
Sacramento, CA 95811  
E-Mail – [srjohnson@cityofsacramento.org](mailto:srjohnson@cityofsacramento.org)

**Re: Comments to Draft Mitigated Negative Declaration for the I-5 Riverfront Reconnection Project (T15998100)**

Dear Mr. Johnson:

We have reviewed the above-referenced Draft Mitigated Negative Declaration for the I-5 Riverfront Reconnection Project. Our comments relate to three issues: (1) The potential for significant increases in traffic congestion at the intersection of Second and I Streets, and the lack of inclusion of any specific mitigations or remedies; (2) the lack of a defined pathway and bicycle/railroad crossing at the project's south extremity, where the Front Street bike path reconnects with the Waterfront Promenade; (3) the lack of any mention of the planned streetcar circulator route on Capitol Mall, and how it would or could integrate with this project; and (4) certain vehicular traffic counts and projections included in the MND documents that are puzzling to us.

#### **Added Congestion at Second and I Streets**

According to the MND document (page 94), eighteen study intersections were selected as those most likely to be affected by this project. Not included in this list was the intersection of Second and I Streets, an intersection that is already congested and likely to become more so as additional improvements are made to surrounding facilities, including the Sacramento Intermodal Transportation Facility.

State Parks and the City have recently cooperated to design planned improvements to the school/tour bus parking and adjacent driving lanes and bike/pedestrian pathways underneath the I Street Viaduct. However, the proposed Reconnection Project is likely to create additional traffic impacts at Second and I Streets, with cars driving the length of Second Street (from the proposed connector structure from Capitol Mall) and turning right onto I Street to access the public parking garage. Given that the Public Parking

*I-5 Riverfront Draft Mitigated Negative Declaration, Page 2*

Garage underneath I-5 also serves as the overflow parking for the Intermodal, there are reverse flows created during peak times as well through this intersection.

With the addition of the proposed connector structure from Capitol Mall, we believe commuters, taxis and other vehicles are likely to use Second Street to access/exit the Sacramento Intermodal Transportation Facility as an alternative to Third and Fifth Streets, at least until such time as other nearby circulation improvement projects are implemented by the City. Should the proposed arena facility become a reality just west of the Intermodal facility, the circulation impacts could be devastating to this area.

For these reasons, we believe that the intersection of Second and I Streets requires further study and the adoption of improvements to help mitigate the likely affects of this and surrounding projects, including the continuing improvement and expansion efforts for the adjacent Sacramento Intermodal Terminal Facility.

**Lack of Defined Pathway and Bicycle/Railroad Crossing**

At the project's southwestern extremity, bicycles and pedestrians emerge from a designated pathway that follows the present-day Front Street alignment and dives underneath Capitol Mall. At the point where this emerges at its south end, however, there is no defined pathway connecting this project with existing bicycle and pedestrian pathways in the vicinity, particularly the Waterfront Promenade.

One or more safe and appropriate bicycle and pedestrian pathways must be located, designed and implemented as part of this project. Improved railroad grade crossings (bike/pedestrian) will likely be required, and these crossing(s) will need to be designed to meet the requirements of the California Public Utilities Commission, the agency which has regulatory control over permitting of all railroad grade crossings.

State Parks is operator of the Sacramento Southern Railroad which parallels the Sacramento River through Old Sacramento. We would expect that the costs of designing and installing connecting pathways, railroad grade crossings, and related improvements would be borne by the City in connection with this project, similar to the manner in which the Waterfront Promenade Project has been implemented south of O Street.

**No Mention of Planned Streetcar Circulator Route**

We were unable to find any mention of the planned Streetcar Circulator line that is under consideration to connect West Sacramento and Sacramento via Capitol Mall. To our knowledge all route options planned thus far cross the Tower Bridge, and therefore streetcars would have to traverse Capitol Mall through the project area. We find it

*I-5 Riverfront Draft Mitigated Negative Declaration, Page 3*

puzzling that this does not appear in the design alternatives for the new intersections of Front Street/Second Street with Capitol Mall.

### **Vehicular Traffic Counts and Projections**

In studying the vehicular traffic count data provided in the document, we are puzzled by wide variations between the numbers cited in Figure 15 (Existing Conditions With Project) and those found in Figure 17 (Year 2035 No Project). In particular, at the current Front Street (south) entrance from Capitol Mall into Old Sacramento, the 1,100 trips cited for "existing conditions" if the project is implemented, somehow balloons to 11,000 in the year 2035 at this same entrance, if the project is *not* implemented.

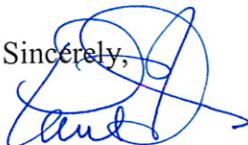
We do not understand how this projection was arrived at. On the surface, it appears there may be an error in the data. Given this kind of projection, it would appear that studying future impacts to the intersection of Second and I Streets is of extreme importance now rather than later, as traffic could increase tenfold or more under certain conditions.

### **Conclusion**

At present, California State Parks is engaged in a General Planning Process for Old Sacramento State Historic Park. The collective expertise of the community has been brought into this process, with representation from a variety of City of Sacramento staff members, and stakeholders from the Old Sacramento Historic District. We would be delighted to share the results thus far from this process, and to continue to work together with the City to define our common goals and develop the best possible solutions for this proposed project and the many other planned facilities and improvements that we believe it would potentially affect or interact with.

We thank you for the opportunity to submit these comments to the Draft Mitigated Negative Declaration for the I-5 Riverfront Reconnection Project. I would be happy to personally discuss these matters with you and/or to clarify any questions you might have. Please feel free to contact me at (916) 849-0679 or via e-mail: phammond@parks.ca.gov.

Sincerely,



Paul Hammond  
Museum Director  
California State Railroad Museum

Cc: Jesse Gothan, Associate Engineer, City of Sacramento  
Jerry Way, Director, Department of Transportation  
Pati Brown, District Services Manager, Capital District  
Catherine A. Taylor, District Superintendent, Capital District

**Scott Johnson**

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**From:** Kennedy, Donald [DLKn@pge.com]  
**Sent:** Friday, August 05, 2011 7:40 AM  
**To:** Scott Johnson  
**Subject:** PG&E Comments - Riverfront Connection Project

Mr. Johnson,

**RE: Notice of Intent to Adopt a Negative Declaration - Draft Mitigated Negative Declaration for the I-5 Riverfront Reconnection Project (T15998100)**

PG&E has reviewed this project and has the following comments to offer:

PG&E owns and operates gas transmission and distribution facilities which are located within the project boundaries. To promote the safe and reliable maintenance and operation of utility facilities, the California Public Utilities Commission (CPUC) has mandated specific clearance requirements between utility facilities and surrounding objects or construction activities. To ensure compliance with these standards, project proponents should coordinate with PG&E early in the development of their plans. Any proposed development plans should provide for unrestricted utility access and prevent encroachments that might impair the safe and reliable maintenance and operation of PG&E's facilities. PG&E will need to maintain its gas transmission line, free and clear from any obstructions to ensure access with heavy equipment and sufficient working room around the gas line.

Prior to any excavation near the gas transmission facilities;

1. Excavator to call USA when requesting PG&E to locate and mark gas pipe. Request field meeting with PG&E Locator (via the USA comment section) to discuss the proposed work and to confirm PG&E contact number for standby.
2. A PG&E standby person is required to be on site whenever excavation is within 5-foot from the edge of the pipe. Excavator to call PG&E at (916) 386-5153, 48-hours in advance to request inspector to standby.
3. Prior to using any power operated equipment, the approximate location of the pipe must first be determined by hand excavation or careful probing. Probe at right angles to the pipe at a depth of 24 inches and at spacing no greater than 5 inches. If it is determined that the depth of the pipeline is greater than the initial probing or hand excavation, then excavation by power-operated equipment will be permitted to a depth 12 inches less than the actual probing or hand dug depth. Hand digging is required within 12 inches from the pipe.

Any proposed crossings or construction work over PG&E's facilities shall be reviewed prior to any construction activities taking place around PG&E's pipe line facilities.

Continued development consistent with the City's General Plans will have a cumulative impact on PG&E's gas systems and may require on-site and off-site additions and improvements to the facilities which supply these services. Because utility facilities are operated as an integrated system, the presence of an existing gas transmission or distribution facility does not necessarily mean the facility has capacity to connect new loads.

Expansion of distribution and transmission lines and related facilities is a necessary consequence of growth and development. In addition to adding new distribution feeders, the range of electric system improvements needed to accommodate growth may include regulator stations, odorizer stations, valve lots, distribution and transmission lines.

## Comment Letter: LO1

We would like to recommend that environmental documents for proposed development projects include adequate evaluation of cumulative impacts to utility systems, the utility facilities needed to serve those developments, any possible relocations, and any potential environmental issues associated with extending utility service to the proposed project. This will assure the projects compliance with CEQA and reduce potential delays to the project schedule.

Once conflict maps of PG&E's facilities become available, please send the conflict maps to myself at the address in my signature block.

If you have any questions, you may contact me at (530) 889-5089 or via email at [dlkn@pge.com](mailto:dlkn@pge.com).

Sincerely,

### **Donny Kennedy**

Pacific Gas & Electric Company  
343 Sacramento Street  
Auburn, CA 95603  
Internal: (8) 732-5089  
External: (530) 889-5089  
Fax: (530) 889-3392



# SACRAMENTO AREA BICYCLE ADVOCATES

August 23, 2011

Scott Johnson, Associate Planner  
City of Sacramento, Community Development Department  
300 Richards Boulevard, 3<sup>rd</sup> Floor  
Sacramento, CA 95811  
[srjohnson@cityofsacramento.org](mailto:srjohnson@cityofsacramento.org)

Subject: Draft Mitigated Negative Declaration (MND) for the I-5 Riverfront Reconnection Project

Dear Mr. Johnson:

Thank you for the opportunity to comment on the MND for the I-5 Riverfront Reconnection Project. We highly commend the City for aiming to improve connections for all transportation modes across I-5 from downtown Sacramento to the Riverfront and Old Sacramento and to fill in gaps in the existing roadway and sidewalk grid.

We have a number of concerns about the project as described in the following paragraphs, especially when considering the "Year 2035 with Project daily traffic volumes" shown in Figure 19.

Capitol Mall. We welcome the proposed bike lanes on Capitol Mall over its bridge over I-5. However, bike lanes should also be installed along both sides of Capitol Mall west of the new Front St/2<sup>nd</sup> St intersection to Tower Bridge. Without bike lanes bicyclists traveling between Old Sacramento or downtown and West Sacramento across the Tower Bridge will be left in a confusing and dangerous situation next to high traffic volumes- up to 44,300 ADT in 2035.

We further recommend that bike lanes have a protected buffer area or grad separation from the vehicle lane. A buffered area or grade separation will make these segments accessible by bicycle for the vast majority of cyclists. Standard bike lanes on this facility are appropriate primarily for bold & experienced riders.

O Street. The text and Figure 10 indicate that no bike lanes will be placed on the O St Bridge over I-5, even with its increased width and 2035 traffic volume of 6,700 ADT. We request that bike lanes be installed on the O St Bridge by expanding the bridge as necessary and narrowing vehicle lanes. Minimum width vehicle lanes would have the auxiliary benefit of slowing traffic speeds.

Front St/2<sup>nd</sup> Street Viaduct. We believe that this proposed viaduct fails to adequately provide for access by bicyclists and therefore is a significant impact of the proposed project. The path will be a major route for bicyclists traveling in numerous directions: to and from Old Sacramento and upriver points to the north, to and from Front Street as it extends southward to Broadway and downriver neighborhoods, to and from downtown employment centers along Capitol Mall, and to and from West Sacramento across the Tower Bridge. We believe that bike

lanes must be provided across the viaduct from L Street to O Street, because of the importance of the signaled intersection of the viaduct and Capitol Mall for multiple bike movements.

Bicyclists arriving in the project area to reach Old Sacramento or downtown from downriver neighborhoods may prefer to use Front Street rather than the Riverfront Promenade because of its shorter, more direct routing. The 2035 project traffic volumes on the viaduct south of Capitol Mall to N Street are projected to be 12,600 ADT, clearly excessive for bike travel on a street lacking bike lanes. The vehicle lane widths on the viaduct shown in the cross sections of Figure 4 appear to be excessive and should be reduced to 10' to slow vehicle traffic in this sensitive area for pedestrian and bicycle travel.

Section D-D of Figure 4 shows bike lanes between N Street and O Street but as depicted the gutter pans will take more than half of the bike lanes. We request that gutter pans on the viaduct be reduced to the minimum possible to provide an adequate bike lane.

Multi-Use Connection from 2<sup>nd</sup> Street via Neasham Circle to Promenade. The multi-use path on Neasham Circle appears intended to provide an alternative connection for bicyclists traveling between the Promenade and Old Sacramento. However, the depiction of the multi-use path connection to the Promenade in the cul-de-sac south of Embassy Suites in Figure 3 is not clear. We believe this connection must be delineated with striping and signage to avoid conflicts with vehicles using the parking lot and the loading dock. For example, bikes should not be routed behind diagonal parking as currently exists. Also, striping and signage needs to be provided at the northern entrance to the path at 2<sup>nd</sup> and L Street to correctly direct bicyclists and pedestrians to their intended destinations (e.g. downtown and Front St versus the Promenade) and to avoid conflicts with vehicles headed to and from the One Capitol Mall loading dock.

The project description also needs to state how horse-and-buggy traffic between its Front Street staging area and Old Sacramento will be accommodated. For example, will it be expected to use the multi-use path or the Front St/2<sup>nd</sup> Street Viaduct?

Finally, we greatly appreciate the trees depicted in Figure 8 between Front Street and I-5. We encourage such a vegetated barrier to air pollution and noise along I-5 be provided along all streets in the project area to the extent possible.

Thank you for considering our comments.

Sincerely,



Tricia Hedahl  
Executive Director

Cc: Ed Cox, City of Sacramento Alternative-Modes Coordinator ([eCox@cityofsacramento.org](mailto:eCox@cityofsacramento.org))

*SABA is an award winning nonprofit with more than 1,000 members that works toward more and safer trips by bike. We envision a future in which bicycling for transportation is common because it is safe, convenient, and desirable.*

**Scott Johnson**

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**From:** Bruce Kemp [brucebkemp@gmail.com]  
**Sent:** Tuesday, August 30, 2011 11:13 PM  
**To:** Jesse Gothan; Scott Johnson  
**Subject:** I-5 Riverfront Reconnection Project (T15998100); comments on draft IS/MND

[FYI. Duplicate copy of comments submitted this date via Public Comment form on the City website]

Dear sirs:

I am submitting these comments on the Draft Mitigated Negative Declaration and associated Initial Study for the I-5 Riverfront Reconnection Project (T15998100) on behalf of the Riverfront Plaza Association, the homeowners association serving the Riverfront Plaza Condominiums community at 200 P Street in the Downtown area of Sacramento. Our residential complex occupies the city block between P Street on the north and Q Street on the south, and Second Street/Interstate 5 on the west and Third Street on the east. The Association represents the common interests of the 91 condominium owners.

The residents of the Riverfront Plaza Condominiums enjoy the amenities afforded by our Downtown location. The expanded Crocker Art Museum is located across P Street, and the Riverfront/Old Sacramento area is a short walk or bicycle ride over the O Street Bridge and along the Riverfront Promenade. Tower Bridge and Capitol Mall are also nearby. Generally, we would support improvements that enhance pedestrian and bicycle access, reconnect the Downtown to the Riverfront, and improve pedestrian, bicycle, and vehicle circulation in this area. We understand that the current project design represents a scaled-back version of the earlier, more ambitious I-5 decking alternatives, which have unfortunately been found to be infeasible. We hope that the City may eventually find a way to overcome these financial and technical hurdles in the future.

We have reviewed the I-5 Riverfront Reconnection Project documents on the City website, and we appreciate the open house meeting on August 17, which provided an informal opportunity to talk with the project team. In our review, we did identify what appear to be discrepancies in the traffic analysis in the CEQA documentation. We are submitting these comments to ensure that we receive due consideration in this process and to go on record for any subsequent, related projects and environmental reviews.

As represented in the project documents, the project will not involve any construction work on P Street, including on our block between 2<sup>nd</sup> and 3<sup>rd</sup> Streets. The closest part of the project area would be on O Street. The environmental review does appropriately address a wider study area, and in the traffic section of the Initial Study, the existing P Street is characterized as a three-lane, one-way arterial (p. 92); 3<sup>rd</sup> and P and 2<sup>nd</sup> and P are two of the 18 potentially affected intersections in the study area (p. 94). The impact assessment does not identify any traffic or circulation impacts that would require mitigation, including any cumulative impacts or mitigation measures affecting P Street in any way. The Initial Study impact assessment is supported by a Traffic Impact Analysis, Appendix B.

In Appendix B, Figure 5, the "Existing Conditions" map (omitted from the body of the Initial Study), correctly portrays the existing three lanes on P Street between 3<sup>rd</sup> and 2<sup>nd</sup> Streets with existing parallel parking. The future "Year 2015 No Project" map (Figure 15) also shows that road segment as

Comment Letter: LO3

three lanes with parallel parking. However, the several maps showing the various "With Project" alternatives (Figures 11, 12, and 13) show the road segment as 4 lanes *without* parking.

We are concerned that traffic study appears to imply the loss of parallel parking on P Street. Currently, there are 6 metered spaces on the south side, adjacent to our complex, and 3 metered spaces on the Crocker Art Museum side. These spaces, especially on the south side, are regularly used by Riverfront Plaza residents, guests, vendors, and service vehicles. We are concerned that the maps showing future conditions imply that the parking lanes will not be preserved in the future.

Our reading of the project documents, including the CEQA documents, is that the I-5 Reconnection Project will not directly or indirectly cause the closure or loss of the parking lanes on P Street. We ask that you please confirm that this understanding is correct. We request that you review the traffic analysis and, as necessary, revise the pertinent parts of the Initial Study (including Appendix B) to resolve the apparent discrepancies.

We also would welcome an explanation regarding why the study seems to assume the future loss of the parking lanes on this segment of P Street. If removal of the parking lanes were actually proposed, our position would be to oppose such a loss in parking capacity on our segment of P Street. Not only do we regularly use these spaces, but we also are concerned that the loss of the parking lanes would further encourage excessive speeds, as vehicles accelerate on approach to the highway onramps. If the parking lanes were removed, additional traffic volumes would result, with associated safety issues, as motorists pass our complex on P Street to merge onto I-5. In addition to the loss of parking and safety issues, the additional traffic associated with a fourth lane would also result in increased noise and air quality effects to adjacent residential receptors, which would need to be addressed, including cumulative effects in the vicinity.

Thank you for your consideration of these comments.

Bruce Kemp  
Riverfront Plaza Association  
200 P Street  
Sacramento, CA 95814  
[brucebkemp@gmail.com](mailto:brucebkemp@gmail.com)  
916-446-1713



August 31, 2011

Scott Johnson, Associate Planner  
City of Sacramento, Community Development Department  
300 Richards Boulevard  
Sacramento, CA 95811

**RE: I-5 Riverfront Reconnection Project (T15998100)**

Dear Mr. Johnson:

Thank you for the opportunity to provide comments on the proposed I-5 Riverfront Reconnection Project. WALKSACRAMENTO is a nonprofit organization dedicated to achieving safe, walkable communities – for public health and recreation, for livable neighborhoods, for traffic safety, and for clean air.

The purpose of this letter is to examine the proposed project from the perspective of its ability to contribute to conditions that promote public health in the City of Sacramento. The proposed project will provide additional street connectivity between downtown and Old Sacramento and improvements to pedestrian and bicycle infrastructure. The proposed project includes conversion of a portion of Neasham Circle into a bicycle/pedestrian-only facility between Front Street and 2<sup>nd</sup> Street and construction of a raised roadway above the existing Neasham Circle south of Capitol Mall. The project appears to offer a number of features that will serve to promote and improve health status of the resident population and users of these facilities.

The proposed project will create new opportunities for public walking and bicycling, by providing improvements to pedestrian and bicycle facilities and by adding new street connections between downtown and Old Sacramento. Both of these will enhance the overall walkability of the area. Studies in other cities have shown that improvements in neighborhood walkability have yielded measurable improvements in health outcomes of residents. For example, a 5% increase in neighborhood walkability has been associated with a weight loss of 1-2 lbs. in Seattle residents.<sup>1</sup> Greater street connectivity, as a component of walkability, has been associated with reduced rates of high blood pressure.<sup>2</sup>

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<sup>1</sup> Frank LD, Sallis J, Conway T, Chapman J, Saelens B, Bachman W. Many Pathways to Land Use and Health: Associations Between Neighborhood Walkability and Active Transportation, Body Mass Index, and Air Quality. *J Amer Planning Assoc* 2006, 72 (1): 75-87.

<sup>2</sup> Li F et al. Built environment and changes in blood pressure in middle aged and older adults. *Prev Med* 2009; 48(3), 237-41.

909 12<sup>th</sup> Street, Suite 122, Sacramento CA 95814  
916-446-9255 / Federal Tax I.D.# 94-3395491



Cities with higher levels of bicycle infrastructure such as bike lanes have higher levels of bicycle commuting.<sup>3</sup> Bicycle commuting increases physical activity levels of the resident population and reduces rates of overweight and chronic disease conditions. Bicycle commuting also reduces traffic congestion, noise, and air pollution.

In addition to promoting physical activity by providing facilities for walking and bicycling, the new bicycle/pedestrian-only facility will result in other conditions positive to the promotion of public health:

- The bicycle/pedestrian-only facility may provide a noise barrier between I-5 traffic and the historic district of Old Sacramento. Noise levels measured in front of 1200 Second Street in Old Sacramento in the early afternoon were in excess of 70 decibels. Levels of community noise above 55 decibels (dB) are associated with numerous adverse health conditions, including high blood pressure, risk of myocardial infarction, interference with speech communication outdoors, and higher stress and stress hormone levels.<sup>4</sup>
- The bicycle/pedestrian-only facility is far wider and more open than a standard tunnel under a roadway, providing a potential benefit in reducing crime and improving user safety.

The bicycle/pedestrian-only facility between Front Street and 2<sup>nd</sup> Street has an aesthetically pleasing design, including features such as a solid brick front that reflect the architectural features of Old Sacramento, that will serve to invite walking and bicycling in the area. As a visual barrier between I-5 traffic and the historic district of Old Sacramento, it creates a greater sense of safety and separation from the freeway for pedestrians and bicyclists.

Please contact me at [TDuarte@walksacramento.org](mailto:TDuarte@walksacramento.org) or 916-446-9255 if you have any questions regarding these comments.

Sincerely,

A handwritten signature in purple ink that reads "Teri Duarte".

Teri Duarte, MPH  
Executive Director

<sup>3</sup> Dill J, Carr T 2003; Bicycle Commuting and Facilities in Major US Cities. *Transportation Research Record* 1828, No. 03-4134.

<sup>4</sup> San Francisco Department of Public Health, Environmental Health Section, Program on Health Equity and Sustainability, Health, Traffic, and Environmental Justice: a Health Impact Assessment of the Still/Lyell Freeway Channel in the Excelsior District. [http://www.sfpbes.org/PODER/PODER\\_HIA\\_Methods\\_Findings.htm](http://www.sfpbes.org/PODER/PODER_HIA_Methods_Findings.htm). Accessed August 25, 2011.

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# I-5 Riverfront Reconnection Project

**For general questions or comments on the project**

Contact Jesse Gothan, City of Sacramento Project Manager, at (916) 808-6897 or [jGothan@cityofsacramento.org](mailto:jGothan@cityofsacramento.org) or use the back of this card to submit your comments at today's meeting

**To review and comment on the project's Draft Initial Study/Mitigated Negative Declaration (IS/MND)**

Visit: [www.cityofsacramento.org/dsd/planning/environmental-review/eirs](http://www.cityofsacramento.org/dsd/planning/environmental-review/eirs)

**For more project information**

Visit: [www.cityofsacramento.org/transportation/engineering/bridging\\_I-5/index.html](http://www.cityofsacramento.org/transportation/engineering/bridging_I-5/index.html)

**Written comments on the IS/MND can be submitted to:**

Scott Johnson, Associate Planner  
City of Sacramento, Community Development Department  
300 Richards Boulevard  
Sacramento, CA 95811  
(916) 808-5842  
[srjohnson@cityofsacramento.org](mailto:srjohnson@cityofsacramento.org)



**GENERAL COMMENTS ONLY**

To submit formal comments on the Draft Environmental Document, please see instructions on opposite side

The need to maintain 2nd Street across Capital open during construction is necessary to maintain bicycle / pedestrian continuity.

Name KENT JONES  
Address 539 E ST  
City DAVIS State CA Zipcode 95616  
Email Jones.Keith@comcast.net

**Scott Johnson**

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**From:** Jesse Gothan  
**Sent:** Monday, August 29, 2011 1:13 PM  
**To:** Scott Johnson  
**Cc:** Seyedmadani, Ali  
**Subject:** FW: I-5 Riverfront Reconnection Project  
**Attachments:** Embassy Map.doc

Hi Scott,

Below are comments from Embassy Suites regarding I-5 Riverfront Reconnection. - Jesse

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**From:** Steve Mammet [<mailto:smammet@essacramento.com>]  
**Sent:** Monday, August 29, 2011 12:25 PM  
**To:** Jesse Gothan  
**Cc:** Fettah Aydin  
**Subject:** RE: I-5 Riverfront Reconnection Project

Hello Jesse,

Thank you very much for this information.

I had two comments I would like you to consider:

1. Create a left hand turn-pocket from E/B Capitol to N/B Second street to accommodate people from I-80 into Old Sacramento. To accommodate this, you could shorten the W/B turn pocket into Embassy Suites.
2. The temporary "lane" directly in front of the Embassy Suites is used for bus loading and unloading. You mentioned that the sidewalks were to be widened considerably. I was unsure if this widening extended to the hotel, but wanted you to be aware of this use directly in front of the hotel.

I have attached a diagram to represent both issues.

If you have any questions, please feel free to call.

STEVE MAMMET  
GENERAL MANAGER

EMBASSY SUITES HOTEL  
100 Capitol Mall  
Sacramento, CA 95814

PHONE 916-326-5005  
FAX 916-326-5001  
[smammet@essacramento.com](mailto:smammet@essacramento.com)

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**From:** Jesse Gothan [<mailto:JGothan@cityofsacramento.org>]  
**Sent:** Monday, August 29, 2011 10:58 AM  
**To:** Steve Mammet  
**Subject:** I-5 Riverfront Reconnection Project

Good Morning Steve,

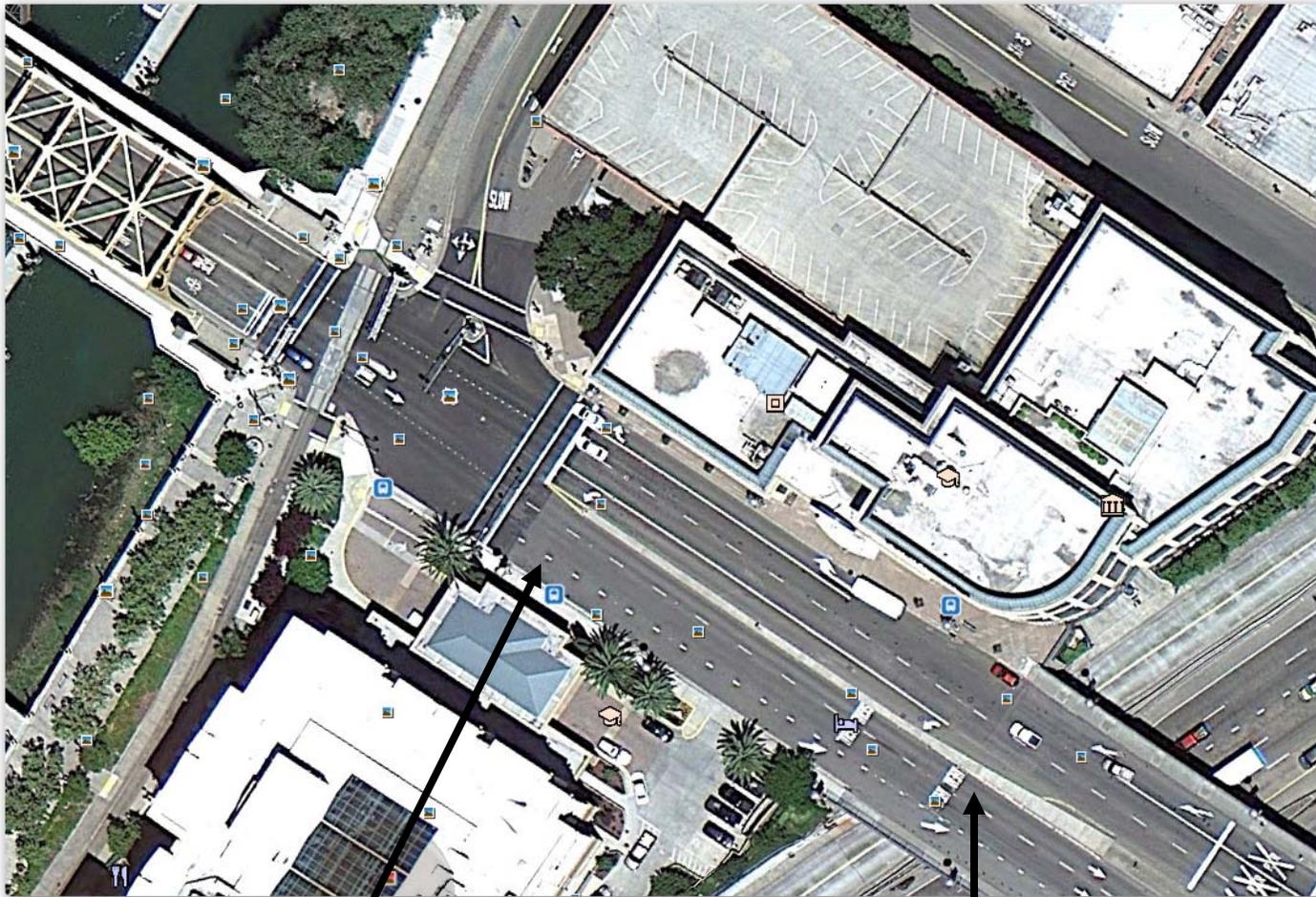
## Comment Letter: IP2

At the below link you will find a website for the project. If you have any questions or comments please email me or Scott Johnson directly. Attached is a board that was at the community meeting that shows a conceptual rendering of how the realigned front street near Embassy Suites could look. – Jesse

Project Website: [http://www.cityofsacramento.org/transportation/engineering/bridging\\_i-5/project\\_components.html](http://www.cityofsacramento.org/transportation/engineering/bridging_i-5/project_components.html)

Informative “Fact Sheet”

[http://www.cityofsacramento.org/transportation/dot\\_media/engineer\\_media/i5/factsheet8311.pdf](http://www.cityofsacramento.org/transportation/dot_media/engineer_media/i5/factsheet8311.pdf)



BUS LOADING AND UNLOADING

LEFT HAND TURN POCKET

## **Response to Comments-Public Agencies**

### **PA1-CVFPB**

Commenter noted a Central Valley Flood Protection Board permit will be required prior to starting work within the Board's jurisdiction. Comment noted.

### **PA2-RWQCB**

Commenter noted permits which may be required for the project from the Regional Water Quality Control Board. Comment noted.

### **PA3-Caltrans**

Commenter requested a visual simulation of the proposed N Street bridge. In response to the comment, the structure advance planning study plans were sent to the commenter, along with the visualizations depicting with project conditions along Front Street. If further visualizations are deemed necessary, they will be completed during the final Plans Specifications and Estimates (PS&E) report.

### **PA4-SRCSD**

Commenter requested the language on page 88, paragraph 1 of the Initial Study be changed as noted to more accurately reflect existing sewage conveyance and treatment facilities. The requested text changes have been noted. The text changes would not result in any change to the analysis or conclusions included in the Initial Study.

### **PA5-PUC**

Commenter noted the proposed project does not affect any current rail systems but does not address the current plans to run trolleys over the Tower Bridge on Capitol Mall. It is noted in the traffic report that the Cities of Sacramento and West Sacramento are currently investigating the feasibility of installing a streetcar service on Tower Bridge and Capitol Mall, but the timing is not currently defined, planning is incomplete, and funding for the streetcar project has not been identified. This streetcar service is not part of the I-5 Riverfront Reconnection Project. If and when the Streetcar Project moves forward, coordination between West Sacramento and Sacramento will continue.

### **PA6-CA State Parks**

(1) Commenter is concerned about the potential for significant increases in traffic congestion at the intersection of Second and I Streets, and the lack of inclusion of any specific mitigations or remedies.;

As shown in the traffic report included in Appendix B of the Initial Study, the I-5 Riverfront Reconnection Project would not increase traffic into Old Sacramento. Therefore, the Project would not have an effect on the existing or future operation of the Second Street/I Street intersection. Traffic congestion at this intersection is an existing condition that would not be exacerbated by the Project. The City has indicated this intersection may be improved under a separate project by adding additional access to the parking lot in the vicinity of J Street.

- (2) Commenter is concerned about the lack of a defined pathway and bicycle/railroad crossing at the project's south extremity, where the proposed Front Street bike path reconnects with the Waterfront Promenade;

The existing Front Street is a Class III facility with sidewalks for pedestrians. The cul-de-sac proposed as part of the I-5 Riverfront Reconnection Project would be a similar Class III facility, with bicyclists to share the road and sidewalks for pedestrians. An additional Class III facility would be added on the proposed Front Street and Old Sacramento Connector. The I-5 Riverfront Reconnection Project would not reduce or eliminate access or use of any existing bicycle facility in the vicinity of the project. Bicyclists and pedestrians would continue to use the existing Front Street southbound to the crossing at O Street as they currently do today.

- (3) Commenter is concerned about the lack of any mention of the planned streetcar circulator route on Capitol Mall, and how it would or could integrate with the project; It is noted in the traffic report the Cities of Sacramento and West Sacramento are currently investigating the feasibility of installing a streetcar service on Tower Bridge and Capitol Mall, but the timing is not currently defined, planning is incomplete, and funding for the streetcar project has not been identified. This streetcar service is not part of the I-5 Riverfront Reconnection Project. If the streetcar project does move forward, it is anticipated it would complement the pedestrian facilities which are included with this project. However, the station location would need to be located further east to not impact the proposed Front Street/Capitol Mall/2<sup>nd</sup> Street intersection.

- (4) Commenter noted certain vehicular traffic counts and projections included in the Initial Study documents are "puzzling" to them. In comparing the graphics in the Traffic Report, located in Appendix B of the Initial Study, Figure 5 (Existing Conditions) shows 1,700 Average Daily Traffic (ADT) on Front Street compared to 1,100 with the project (Figure 13 -Alternative 3, Existing Conditions with Project), which is a reduction in traffic due to the redistribution of traffic following implementation of the Project.

When Figure 23 (Year 2035, No Project) is compared to Figure 5 (Existing Conditions), the traffic on Front Street in Old Sacramento is projected to rise from 1,700 ADT to 11,000 ADT. This is based on assumed development in the area projected to occur by year 2035. The effect of the project can be seen by comparing Figure 23 (Year 2035, No Project) to Figure 29 (Alternative 3, Year 2035, With Project). With the additional I-5 crossing including in the Project (the proposed N Street Bridge), the project would relieve some of the traffic in the vicinity of Capitol Mall. In addition, the forecasted traffic on Front Street drops from 11,000 ADT without the project to 3,000 with the project.

- (5) The commenter noted that State Parks is engaged in a General Planning Process for Old Sacramento State Historic Park.

The City looks forward to continue to work with State Parks in this project, future projects and their General Planning Process.

## **Response to Comments-Local Organizations**

### **LO1-PG&E**

PG&E owns and operates gas transmission and distribution facilities which are located within the project boundaries.

Facility maps indicate PG&E owns a 1 ¼-inch gas line along Neasham Circle which provides service to One Capitol Mall and the office building located along the corner of L Street and Neasham Circle. During final PS&E, letters will be sent to all utilities within the project limits to verify locations and depths to determine if any conflicts exist and if adjustments are required.

### **LO2-SABA**

(1) Commenter would like to see bike lanes along Capitol Mall in addition to the Class I facility proposed for the Capitol Mall Bridge over I-5, along with a buffered area or grade separation.

Bike lanes are included in the I-5 Riverfront Reconnection Project along Capitol Mall from the Capitol Mall/3<sup>rd</sup> Street intersection to the Capitol Mall/Front Street intersection. The proposed bike lanes are as per City standards, which does not include a buffer area between the traffic and bike lanes. There is no standard for buffered bike lanes.

(2) Commenter noted that the O Street bridge widening does not include the addition of bike lanes.

Bike lanes could be added to the O Street structure by reducing the travel lanes to 11 feet and modifying the existing sidewalk or increasing the width of the proposed widening slightly. These options will be further reviewed during final PS&E.

(3) Commenter feels the Front Street/2<sup>nd</sup> Street Viaduct fails to adequately provide for access by bicyclists and therefore is a significant impact of the proposed project. Commenter feels bike lanes must be provided across the viaduct from L Street to O Street and that the vehicle lane width should be reduced to 10 feet to slow vehicle traffic in this sensitive area for pedestrians and bicycle travel.

The project includes the addition of bicycle lanes on Front Street between O Street and N Street. The proposed viaduct structure was narrowed to provide for more vertical clearance underneath the structure for the Class I multi-use path. During final PS&E the City may consider the addition of bike lanes on the Front Street Viaduct. Bike lanes were removed from the original design of the 2<sup>nd</sup> Street ramp, along with narrowing the travel lanes, to reduce the overall width of the structure to provide for a more pedestrian friendly roadway. The gutters shown in Figure 4, Section D-D, are the City standard curb and gutter section, with 24 inches of gutter and 4 feet of bike lane outside the gutter area.

- (4) Commenter feels the multi-use path connection to the Promenade in the cul-de-sac south of the Embassy Suites is not clear.

The area in question would be well defined with striping and signage with implementation of the I-5 Riverfront Reconnection Project. Bicyclists would share the road with the motorists on the cul-de-sac, as currently is done in this area. Pedestrians would use the sidewalk located behind the parking areas. The multi-use path would be shared by bicyclists, pedestrians, and horse-and-buggies as they return to their holding area in the evening.

- (5) Commenter noted appreciation for the trees between Front Street and I-5.  
Comment noted.

### **LO3-Riverfront Plaza Association**

Commenter noted graphics in Appendix B (Traffic Report) of the environmental document show the with-project conditions as no parking along P Street between 2<sup>nd</sup> Street and 3<sup>rd</sup> Street.

The with-project conditions reflect four travel lanes, where as the existing roadway section has three travel lanes with parallel parking. The graphics showing four travel lanes are incorrect and have been updated. The change in the graphics does not change the analysis of the traffic study.

### **LO4-Walk Sacramento**

Commenter noted benefits to bike lanes and pedestrian facilities.  
Comments noted.

## **Response to Comments-Individual Parties**

### **IP1-Keith Jones**

Commenter noted the need to maintain 2<sup>nd</sup> Street across Capitol Mall during construction for bicycle and pedestrian continuity.

The sidewalk from 2<sup>nd</sup> Street up to Capitol Mall, in front of the One Capitol Mall building, would be maintained during construction.

### **IP2-Embassy Suites**

- (1) Commenter requested a left hand turn-pocket from eastbound Capitol Mall to northbound Second Street.

A left turn pocket at this location is included in the I-5 Riverfront Reconnection Project.

- (2) Commenter noted the temporary lane directly in front of the Embassy Suites is used for bus loading and unloading. Commenter was unsure if the sidewalk widening would extend to the hotel, but wanted to make sure we were aware of this use directly in front of the hotel.

Comment noted. The merge lane would be converted into a bus turnout as part of the I-5 Riverfront Reconnection Project. The widened sidewalks included in the Project are only on the Capitol Mall bridge.