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TRANSPORTATION

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Subject: Downtown-Natomas- Airport Light Rail- MOS-1 Draft Environmental Impact Report.

Thank you for the opportunity to review the Downtown-Natomas- Airport Light Rail- MOS-1 DEIR. I am submitting these comments and request that these comments be considered in the preparation of Final EIR for the subject project.

- 6-1 1. The traffic study, conducted for the proposed project, assumed that the intersection of North B St/ 7th shall be signalized with the proposed project. Please confirm this assumption and if so, a signal concept report and coordination with the City of Sacramento, Traffic Engineering Department shall be conducted regarding all required equipment for this signalized intersection.
- 6-2 2. The Transportation and Circulation chapter (Chapter 5.2) analyzed different scenarios: No Parking Option, On-street Parking Option, Off Street Parking Option. For either one of the option analyzed there is a need to coordinate with Parking Division of Department of Transportation to decide which option shall be implemented regarding parking in the area of the Richards/ 7th Street station. If there is a need to install equipments/ signs to implement any of the analyzed options, then RT and the City has to implement a working plan for such implementation. Please contact Howard Chan at (916) 808-7488 to coordinate parking needs around the 7th / Richards station.
- 6-3 3. Page 5.2-19 under Richards Boulevard Area, the document stated that No parking is required as part of the Light Rail Alternative. Parking impact is considered less than significant. This finding is not considered accurate since the location of the station is anticipated to be considered attractive to the downtown employees who come from the north and can easily park their cars in the Richards area and ride the train to the downtown area. If parking is free or not restricted in the Richards/ 7th St. station, then this project shall have a significant impact on parking in the Richards Boulevard Area. Please revise and clarify.

- 6-4 4. On page 5.2-28, second paragraph, the study shows that the new MOS-1 will add 4 inbound and 4 outbound trains in addition to the existing 8 inbound and 8 outbound Blue Line and Gold Line Trains, but it did not explain the impact of the additional number of trains that will affect the existing signal timing and the existing intersections. More trains mean more delay to traffic. Any new equipment shall be needed? Please include more details about routes, headways, length of stops and how the new trains will operate with the other trains/routes in the downtown area.
- 6-5 5. Page 5.2-22, under Mitigation Measure: a mitigation measure to increase the signal cycle length from 50 seconds to 100 seconds was defined. The study shows that implementing this mitigation measure shall improve the LOS for these intersections to less than significant but did not include if there will be more queuing, especially on the side street, due to the long cycle length. Since the analysis was done for only the peak hour, please include some information about the off peak hours. For example: would the 50 sec cycle still work during the off peaks? Please clarify.
- 6-6 6. Page 5.2-22, under Mitigation Measure, the mitigation measure call to increase the cycle length to 100 seconds. Is there other mitigation measures that could be implemented and reduce the impact to less than significant? As mentioned under comment No. 5 above, the analysis did not look at the impacts of implementing this mitigation measure. For example, increasing queue length on the side streets. The City would prefer to maintain the 50 seconds cycle length since it has been more efficient, practical and it has been used for most intersections within the Downtown area.. Additionally, it will be better to have the Traffic Operation Center to monitor and adjust signal timing when needed, rather than be very specific with this project since other projects are under development in the downtown area and adjustment and changes to signal timing would be needed to accommodate all traffic from other projects in the area.
- 6-7 7. All changes to existing signal timing shall be subject to review and approval by the City of Sacramento, Traffic Engineering Division. All equipment needed for the train operation within any signalized intersection shall be provided by Regional Transit and subject to the approval of the City of Sacramento, Traffic Engineering Division. Please coordinate with Angie Louie, Senior Engineer at 916-808-7921 for any traffic signal timing revisions required for this project
- 6-8 8. Reference to comment No. 7 above, Regional Transit should consider several ITS items to be implemented with this project. For example: cctv at 8th & Gst, cctv on 5th-10th & Richards, As well as cctv at 7th and Railyards, if not provided by others. In addition, a count station on 7th St. shall be required since hose tubes are no longer effective.
- 6-9 9. The track alignment as shown on the plans included in the DEIR document and prepared by HDR is not considered accepted and approved by the City until further review and approval of the Department of Transportation.

10. Our initial comments on the track alignment plans included in the DEIR are:

- 6-10 | • Convert 7th Street from one way to two way operation per the 7th Street Feasibility Study Technical memorandum dated August 2, 2006. Modify the traffic signal at 7th and H Street to include the conversion.
- 6-11 | • All Light Rail tracks shall be place in the number two travel lanes (as shown on the future and ultimate plans submitted to the City of Sacramento, Department of Transportation on February 2009 for review).
- 6-12 | • Bike lanes shall be provided between the train and curb except: in the 7th Street tunnel area and north bound 7th Street (between G and H) where there are no bike lanes required.
- 6-13 | • Provide a safe pedestrian refuge area at the northwest corner of at Richards and 7th Street between the north and south bound RT Tracks. The dynamic train envelope shall be outside the transition areas of the curb ramps.
- 6-14 | • Construct 7th Street north of North B Street to a five lane section with bike lanes and no parking. Trains shall run exclusive in the number two lanes until the future double tracking project south of North B Street is constructed.
- 6-15 | • Construct a Traffic Signal at North B Street/ 7th Street intersection.
- 6-16 | • Re-stripe 7th Street between H and I Streets to accommodate the train and provide acceptable transitions.

Please submit revised track alignment plans to the Department of Transportation and contact Jon Blank, Supervising Engineer at 916-808-7914 for all proposed plans regarding this project.

If I can be of further assistance, please contact me at (916) 808-7808 or via e-mail at shajeer@cityofsacramento.org.

Sincerely,

Samar Hajeer
Senior Engineer

cc: Hector Barron, City Traffic Engineer
Howard Chan, Parking Division Manager
Jon Blank, Supervising Engineer, Engineering Services
Azadeh Doherty, Principal Planner
Ryan Billeci, Telecommunication Engineer



Response to Comments

Submitted by: Samar Hajeer, Senior Engineer

Traffic Engineering Division – City of Sacramento

25 March 2009

6-1

As noted in the DEIR on page 3-3, a new traffic signal at the intersection of North 7th Street and North B Street is included with the proposed project. Comment concerning preparation of a signal concept report and coordination with the City of Sacramento Traffic Engineering Department regarding required equipment for this intersection is noted.

6-2

Comment regarding needed coordination and development of a working plan between Regional Transit and the City of Sacramento Parking Division in the Richards / 7th Street Station area is noted.

6-3

The determination of the significance of the parking impact is based upon the criteria specified in the thresholds of significance. For this document, the threshold of significance for parking is based upon the practice of the City of Sacramento. As noted in the DEIR on page 5.2-13, “a significant impact to parking would occur if the proposed project parking supply were less than the estimated parking demand.” Additionally, the City deems that an impact is not significant if the project is consistent with the parking requirements stipulated in the City Code (zoning ordinance). Therefore, as the project is not required to provide parking per the City Code, the impact is determined to be “less than significant.”

For clarification purposes, the threshold of significance for parking is revised to current City practice (see, for example, Railyards Specific Plan, Draft Environmental Impact Report, August 2007, page 6.12-60):

“For the purposes of this analysis, impacts to parking are considered significant if the project would:

- Result in parking demand that exceeds the available or planned parking supply. However, the impact would not be significant if the project is consistent with the parking requirements stipulated in the City Code.”

It is recognized that the Richards Boulevard Station will likely result in transit riders accessing the station via automobile. Such automobiles could be accommodated via existing on-street parking in the station vicinity. The demand for on-street parking is self-regulating; as nearby parking becomes occupied, it becomes less desirable for transit

patrons to walk longer distances to access the station. As noted in the DEIR (page 5.2-19), existing on-street parking oriented to local industries and businesses can be readily accommodated in available private off-street lots; most on-street parking today in the Richards area occurs for convenience purposes.

At this time, no decisions have been made by the City regarding the supply, regulation, and potential cost of on-street parking in the vicinity of the Richards Boulevard Station. A potential exists for off-street station parking, although such plans are indefinite at this time. As noted in the response to 6-2, Regional Transit will coordinate with the City of Sacramento Parking Division regarding future parking options.

6-4

The additional number of peak-period trains (eight per hour in addition to sixteen per hour currently operating) is not expected to significantly affect existing signal timing or delay existing traffic. A new train will pass through the subject intersections, on average, once every 7.5 minutes. As noted in DEIR Table 5.2-15 (page 5.2-28), the project is expected to generally result in minor reductions in peak period traffic volumes.

No new traffic signal equipment is needed. MOS-1 trains would operate on the same track between the 13th Street Station between Q and R Streets to south of H Street as existing Blue and Gold Line Trains. As noted on page 3-1 in the DEIR, this operation would increase rail traffic on these RT tracks and the increase in rail traffic along existing RT tracks is considered consistent with ongoing RT operations.

6-5 and 6-6

As noted in the DEIR on page 5.2-22, the proposed mitigation measure for the three significantly impacted intersections included changes in the peak period traffic signal cycle length from 50 seconds to 100 seconds. At the intersection of 8th and G Streets, this mitigation is proposed during the a.m. peak hour. At the intersections of 7th Street with G and H Streets, this mitigation is proposed during the p.m. peak hour.

It should be noted that the a.m. peak hour impact at 8th and G Streets would not be significant if evaluated in accordance with the City's recently adopted level of service policy (General Plan Update, March 3, 2009).

The increase in cycle length was chosen as a mitigation measure in accordance with City practice. Major corridors with congestion issues in the City, such as I Street and J Street, operate at 100-second cycle lengths in peak periods to increase efficiency by decreasing loss time. Due to limitation in available right-of-way in the Central City, other mitigation options, such as roadway widening, are generally not feasible.

Consistent with City practice in other locations, it is not necessary to implement the longer cycle length during off-peak periods, or during both peak hours. As RT does not

control the traffic signal operations, it is ultimately the purview of the City to implement traffic signal timing changes as the City deems appropriate.

6-7

Comment noted regarding coordination with City on traffic signal operations.

6-8

Comment noted regarding coordination with City on ITS elements.

6-9

Comment noted. RT will continue to work with the City of Sacramento on refinements to the precise track alignment until 100% track drawings are prepared and submitted to the City of Sacramento for final approval and signature, which will occur after the FEIR has been certified. The basic configuration of the DNA MOS-1 LRT Project has not changed, and is not expected to change.

6-10

There is no nexus between the DNA MOS-1 LRT Project and the conversion of 7th Street to two-way operation between G and H Streets. The conversion requires the southbound LRT track to be an exclusive LRT-only lane rather than a shared southbound lane, requiring the removal of 10 on-street parking spaces on the west side of the street. In addition, the introduction of northbound traffic requires new traffic signal equipment for northbound traffic at 7th and G Street.

Additional level of service analyses were conducted at four intersections assuming the conversion of 7th Street from one-way to two-way operation between H Street and G Street. Levels of service with the conversion are shown in the **Table 1** and **Table 2** at 7th Street / G Street, 7th Street / H Street, 8th Street / G Street, and 8th Street / H Street and assume the conversion for 2010 no project and MOS1 conditions, as well as Cumulative no project and plus project conditions.

Intersection analysis with the conversion were not prepared for the Railyards alternative, since the subject segment would be the only block converted in what is otherwise a one-way street from Richards Boulevard to the CBD.

No significant impacts or mitigation measures are created or required due to an assumption of the conversion of 7th Street to two-way operations between G Street and H Street in no project and plus project conditions.

6-11 The City's request to move the light rail tracks to the number two travel lanes from the number one travel lanes from B Street to Richards Boulevard requires that the roadway be widened by two feet on both sides by reconstructing curbs and gutters, and

requires the elimination of all on-street parking on both sides of the street from B Street to Richards Boulevard. In addition, the transition from a single track to double tracks to the number two travel lanes at the intersection of 7th and North B Street requires more abrupt track geometry with slower design speeds and a greater distance, forcing the stop bars on the southbound approach to the intersection to be pulled back in addition to the stop bars on the northbound approach being pulled back.

RT has submitted a plan to Marc Lee and Jon Blank at the City of Sacramento that eliminates the proposed raised median, maintains the continuous left turn lane, and keeps the light rail tracks in the number one travel lanes. This alternative does not require the reconstruction of curbs and gutters, the narrowing of the public right-of-way from the curbs to private properties, or the elimination of on-street parking.

The traffic signal phasing at 7th and North B Streets, and at 7th Street and Richards Boulevard does not change with any of these alignment variations, and therefore the traffic analysis is unchanged. 7th Street and Richards Boulevard is a split phase traffic signal whereby northbound left turns and through moves are combined in one phase. Because of this arrangement, it is equally feasible for the LRT to turn left from 7th Street to Richards Boulevard from the left turn lane (where it would be if it were in the number one lane) or from the through lane (where it would be if it were in the number two lane) coincident with traffic and not requiring a separate phase.

6-12 Drawings received from Ed Cox at the City of Sacramento on 3/26/09 do not include a bike lane on 8th Street between H and G Street, but do eliminate 11 parking spaces on the west side of the street. On G Street between 8th and 7th Streets, the bike lane can be accommodated without impacts to curbs, gutters, street trees and utilities by eliminating seven on-street parking spaces from the south side of the street. Comments made by the City of Sacramento on 2/18/09 requested a right-turn-only lane for northbound 7th Street to eastbound F Street. There is no nexus between the DNA MOS-1 LRT Project and this right-turn-only lane. Adding this right-turn-only lane requires shifting the east curb on 7th Street by 4.75 feet and will impact or cause the relocation of trees, a traffic signal pole, a pole mounted traffic signal box, and utility vaults, boxes, and valves, including ones labeled SMUD (Sacramento Municipal Utility District), PG&E (Pacific Gas and Electric Company) gas, sewer, fire alarm, cable, and traffic signal.

6-13 RT will comply by increasing the curve radii of the tracks from 7th Street to Richards Boulevard. This modification does not result in any new impacts.

6-14 At a meeting on 3/11/09, Jon Blank requested that the southbound LRT lane be exclusive, and the northbound LRT lane be shared. These variations do not result in any new impacts.

6-15 RT will comply with the City's request. The LRT transition from side-running single-track south of North B Street to a double-track in shared traffic lanes north of North B Street requires a traffic signal with a special LRT phases to stop traffic while the LRT makes the transition. Because Railyards is already obligated to pay for a traffic

signal at North B Street and 7th Street per their Development Agreement with the City of Sacramento, RT would expect to be compensated the value of this traffic signal at time that the Development Agreement would have otherwise required the traffic signal.

6-16 RT will comply with the City's request.