



Save the American River Association

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October 21, 2020

Liz Bellas, Director
Sacramento County Department of Regional Parks
10361 Rockingham Drive, Suite 100
Rancho Cordova, California 95827

Subject: Sacramento County Department of Regional Parks Commission Agenda, October 22, 2020, Agenda Item #3, “*Conceptually Approve Area Plan Map Amendments To The Cal Expo and Woodlake Area Plan Maps Adding The Off Paved Trail As Permanent Use; Provide Director of Regional Parks A Recommendation On Possible Expansion of Off Paved Trail Areas in the American River Parkway.*”

Dear Director Bellas,

Save the American River Association (SARA) appreciates the opportunity to comment on the occasion of the end of the three year off paved trail cycling pilot in the Cal Expo and Woodlake areas of the American River Parkway. SARA was founded in 1961 to establish the American River Parkway and has remained these 59 years as lead advocate for the conservation and protection of the lower American River and Parkway.

Regarding your report to the Parks Commissioners for the Agenda, Item 3, October 22, 2020, we still have many questions regarding the off paved trail cycling three year trial in the Cal Expo/Woodlake areas of the American River Parkway. The supporting documents for approval of the permanent use should have included details on the successes and challenges of each of the conditions as outlined in Policy 5.17, a, b, c, d, e, and f. We believe these details are one of the most important information points necessary for the public to determine whether permanent area plan map amendments and a recommendation on possible expansion of Off Paved Trail Areas in the American River Parkway per American River Parkway Plan Policies 5.16, 5.17, and 5.17.1 are warranted.

COMMENTS REGARDING THE OFF PAVED TRAIL CYCLING THREE YEAR PILOT’S COMPLIANCE WITH POLICY 5.17, a,b,c,d,e, and f:

Policy 5.1

- a) The Implementation Plan should be included in the supporting documents. How were the requirements to include educational signage and a design component accomplished? Over the three year trial program, how did the educational signage and design component adapt to the actual use of the trails? What is the history, if applicable, of the replacement of educational signage that degraded or disappeared? The details of the design component are necessary to determine if it affected, either positively or negatively, the use of the off paved trails.
- b) Has Parks identified stable, continued funding to support and monitor the permanent use of off paved trail cycling in the Cal Expo/Woodlake areas of the American River Parkway? It is important to have the line item costs of the three year trial in order to assess the fiscal responsibilities of the permanent use. The stable, continued funding should also include, to the extent possible, projections for the costs of future improvements/capital projects. Not only must this new use comply with Policy 5.17, a, b, c, d, e, f, but also with Policy 11.5: “New facilities and programs shall not be developed unless the financial resources to operate and maintain them are identified and available.” (*American River Parkway Plan 2008, Chapter 11, Implementation, Policy 11.5, page 213*)
- c) While the monitoring reports did not identify a problem with impacts to wildlife and habitats, we believe, and will ask Dr. Michelle Stevens to confirm, that off-trail behavior posed a risk to the Western Pond Turtle. While the Red Slider, an aggressive non-native turtle, was listed in ESA’s wildlife report, the Western Pond Turtle, an imperiled native, was not. What steps were taken to add natural buffers and design elements to close the informal trails identified in the ESA Final Environmental Monitoring Report? If the Cal Expo/Woodlake off paved trail cycling trails were ever to become popular with the public, the failure to control informal trails can take on a life of their own and become an expensive problem to manage.
- d) The adequacy of signage is not addressed in enough detail to determine if potential users were made aware of the off paved trail cycling opportunity and were confident in knowing the access points and route. In our experience over the three years, many people were unaware of the pilot program, and unsure of the access/route. A recent walk of the Woodlake Area off paved trail cycling route, revealed little to no wayfinding, and no bicyclists. It was a four hour excursion (the goats made up for everything else). It was very easy to become confused and even lost. While excessive signage is discouraged in the American River Parkway, in the instance of an off paved trail course in the Cal Expo/Woodlake Areas, it is necessary to provide enough signage, both educational and wayfinding for users to feel comfortable. This is especially true because of the location of the trails near downtown Sacramento. Many visitors to Sacramento City are aware of the American River Parkway and are eager to experience it.
- e) No information was given regarding the rainy season, and the success of closing the trails if necessary to prevent trail damage. No problems during the rainy season?
- f) The supporting documents should include pictures of the access points near clustered parking areas. This would be helpful in assessing their user friendly quality. In fact,

more pictures illustrating the different kinds and frequencies of signage used to inform and direct the public would be useful in determining what kind of effort was maintained over the three year pilot program to encourage and facilitate its use.

GENERAL COMMENTS:

The absence of trail technical features, except for the one noted in Photo 151, is a suspicious sign that the trails were not heavily used/popular with the off paved trail cyclists. An important component, adding to the excitement of off paved trail cycling routes, is the ability to change up the rider's experience by introducing dips, bumps, barriers, etc. This cannot be overstated. Several years ago when the off paved trail cycling community lobbied to install a pump track at Sutter's Landing Park, community members protesting the use as inappropriate in a park whose future was tied to the American River Parkway, heard through public meetings, the cyclists themselves admit that the dirt trails in the adjacent area of the American River Parkway would be, eventually, their preferred riding site because the built track becomes boring. Also, their preferred route to coming to the pump track, would still be the Parkway's dirt trails. A study of the bike jump area, illegally built in the Paradise Beach area, now dismantled, would be instrumental in understanding what does and does not make trails popular with off paved trail cyclists. Also, Sutter's Landing Park's dirt trail along the River, is a good example of trail technical features that make it popular with off trail cyclists.

We remember during hearings before the Parks Commissioners in 2017 strong testimony from the off paved trail cycling community that there was an unmet need for youth recreation, education, and events. Did any events or youth programs happen over the three year pilot program?

It is unclear from the report out of the Survey Monkey whether the 90-100% of survey respondents who said riding a bicycle is their primary activity on the trails, which trails they were referencing. The off paved trail cycling trails? The Jedidiah Smith bicycle trail? A combination of both?

In the 26 pages of ESA's pictures in the Final Environmental Monitoring Report, no off paved trail cyclists are photographed using the trails even though the report states that off paved trail cyclists were observed on most pilot program trails during each monitoring event. What were the pilot program trails where no off-paved cyclists were observed during each monitoring event?

Before we make permanent Area Plan Map Amendments, SARA believes that more work needs to be done to answer the question of why the most use tracked was in October 2017, right after the pilot program opened?

RECOMMENDATION ON POSSIBLE EXPANSION OF OFF PAVED TRAIL AREAS IN THE AMERICAN RIVER PARKWAY

SARA remains opposed to expanding off paved trail cycling to other areas of the American River Parkway, most especially because the recommendation does not comply with the *American River Parkway Plan 2008, Chapter 5, Policies 5.16, 5.17-5.17.1, pages 96-97*, and most importantly, with the Plan's own direction to maintain a trails system consisting of three designated types:

equestrian/hiking trails, pedestrian trails, and bicycle trails. (*American River Parkway Plan, Chapter 8, Public Access and Trails, pages 130-131*)

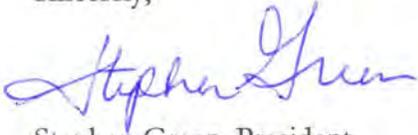
SARA knows from 59 years of collected experiences from Parkway users, that the off paved trail cyclists, while prohibited from using the equestrian/hiking trails, do so anyway. We know that the off paved trail cycling trial in the CAL Expo and Woodlake areas of the American River Parkway, has not helped with this illegal activity in the remainder of the Parkway. There persists no way to eliminate the inherent problem of users traveling at slow and fast rates of speed, attempting to share, for the most part, narrow dirt trails. Nature-hikers, dog walkers, equestrians, joggers, home schoolers, photographers, etc., cannot mix safely with bicycles riding on the dirt trails. Users traveling at slower paces do not need clear sight lines and extended reaction times to avoid dangerous interactions that might result in serious injury. Users, especially older and/or physically impaired adults, and families with small children cannot peacefully enjoy sightseeing, nature, and exercise, if they are worried about colliding with fast moving cyclists coming around a corner.

Given the near term condition of the County's General Fund, and the chronic shortfalls in the Parks Department's budget, there is no way to eliminate the fact that expanding the off paved trail cycling use to other areas of the Parkway, will require a new level of enforcement that is not currently, if ever, possible. Current signage (often vandalized), and Ranger patrols (stretched too thin) have not kept off paved trail cyclists from riding where they shouldn't, as well as creating "courses". In addition to the bicyclists who currently ride the trails illegally we are now seeing electric bikes. On holidays and weekends, we have observed off paved trail cycling clubs traveling from out-of-town to ride the Parkway's equestrian/hiking trails. Group rides have the potential to expand in numbers and frequency to create situations that push the general public off the dirt trails, much the same way out of town rafters had pushed families and other users off of the River. To this date, it takes resources and constant vigil to keep these crowds in check. Without a dedicated team of Rangers, assigned to riding the equestrian/hiking trails, and responding immediately to calls for service, there is no way to prevent off-trail cycling from displacing existing authorized Parkway users.

How much of the Parks' budget is set aside for studying the possible expansion of off paved trail areas in the American River Parkway? What does that study look like? How will the study relate to the Natural Resources Management Plan currently underway? Will the public be involved in choosing the areas to study? SARA would like to work with the Parks Department to devise a more targeted reporting system for user complaints regarding off paved trail cycling on the equestrian/hiking trails. It is very difficult to get users to make 311 reports on off paved trail cycling problems because the bicycles come and go before a Ranger can possibly respond. We think if a discreet system were set up whereby the impacted user did not expect action, but understood that the report was focused on data gathering to inform solutions to the problem, there would be more reporting, and it could provide valuable information for the study. We have had some success marketing the 311 system using this approach to reporting other kinds of issues in the Parkway.

The courtesy of your attention to and consideration of these comments is greatly appreciated. We look forward to continuing to working with you to maintain an American River Parkway that is safe for people, plants, and animals.

Sincerely,



Stephen Green, President
Save the American River Association

cc: Board of Directors, Save the American River Association
Lilly Allen, Chair, Sacramento Recreation and Park Commission
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