



Save the American River Association

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November 8, 2013

Mr. Jeffrey R. Leatherman, Director
Sacramento County Regional Parks Department
4040 Bradshaw Road
Sacramento, California 95827

Subject: **Permit for Gold Country Orienteers Special Event on the American River Parkway and Regional Parks Permitting Process Defects**

Dear Mr. Leatherman,

This letter acknowledges the receipt of your letter of November 5, 2013, same subject, responding to the September 24, 2013 letter from Ms. Betsy Weiland, Land Use Committee Chairperson, Save the American River Association. As reported at the October 24, 2013 County Recreation and Parks Commission Meeting, the SARA Board of Directors concur with the September 24th letter.

While we believe that we have clearly described the basis for our objection in the September 24, 2013 letter with its attachment, we offer the following response to your letter of November 5, 2013:

1. The recurring nature of any event previously permitted to happen in the Parkway is not sufficient justification to support issuance of another permit in the absence of a current evaluation showing minimal impact of the event on other Parkway users, Parkway resources, and aesthetic values. The American River Parkway Plan 2008 clearly mandates an adaptive management approach that provides for adjustments based upon monitoring of the Parkway resources and aesthetic values.
2. It is true that Table 3-2 of the Parkway Plan identifies "orienteering." However, this Table refers to interpretive facilities and programs that should be included in an interpretive plan (American River Parkway Plan 2008, Chapter 3, Page 76) and not to recreational activities. We fail to see how the Gold Country Orienteers Special Event was an interpretative program of the kind provided for in Chapter 3 of the Parkway Plan.
3. The Regional Parks website contains a Geocaching Policy and Permit Application. This leads us to wonder if the subject event has changed over time from Geocaching to Orienteering. Research shows that these are not the same recreational activities.

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4. The Application for the subject event did not describe a competitive and/or timed event. It did not provide a map showing the routes that would be followed by the event participants. How is it possible to evaluate the event without knowing whether the event is competitive and/or timed and what routes will be followed?
5. The Application for the subject event stated that event participants will “walk or run around the parks”. The issued permit specifies that “Special Events will not negatively impact the park’s cultural or natural resources.” Based upon the observations reported in the attachment to the September 24th letter, we conclude that the event has violated this permit condition. Your response letter provides no evidence to counter this conclusion. We believe that walking or running through Nature Study, Protected Areas and/or Open Space Preserve, and running or walking competitively on or off the Equestrian/Hiking trail are not consistent with managing the Parkway to ensure the protection of its resources, aesthetic and natural values, not to mention the safety and experience of other users.
6. We continue to disagree with your conclusion that the Parkway Plan allows for competitive events to occur on the Equestrian/Hiking Trail.
7. Your response letter does not address the defects in the Regional Parks Permitting Process that were referenced in the September 24, 2013 letter.

Thank you for the opportunity to continue commenting on our concern that the County is failing to recognize its obligation to manage the American River Parkway to ensure the protection of its resources, aesthetic and natural values.

Sincerely,



Save the American River Association
By: Stephen Green, Vice President

cc: SARA Board of Directors
Sacramento County Board of Supervisors
Mr. Bradley J. Hudson, Sacramento County Chief Executive Officer
Mr. Robert B. Leonard, Chief Deputy County Executive
County Recreation and Parks Commission
American River Parkway Advisory Committee
American River Natural History Association
American River Parkway Foundation
American River Parkway Coalition
Gold Country Orienteers