

| Number | Comment | Number of Comments | Theme |
|--------|---|--------------------|-------------------|
| 1 | Pilot time Period - 24 votes for Option A - Signs posted at all access points to the maintenance roads stating that bicycles are not permitted on the roads when the roads are wet from recent rain. 0 votes for Option B - Maintenance roads are closed to bicycles at the onset of the rainy season and remain closed until the trails dry out in the spring, as determined by the Parkway Manager. During this period, signs are posted at all access points to the maintenance roads informing bicyclists of the closure. | 24 | Trails and Access |
| 2 | Consider NC1 as the route <reference to NC1/equestrian/hiking trail in Woodlake the majority section that is not proposed to be part of the mountain biking pilot> | 2 | Trails and Access |
| 3 | NC1 and NC2 intersection - possible conflict - is the sight distance adequate? | 1 | Trails and Access |
| 4 | trails are wide in general | 1 | Trails and Access |
| 5 | people are going everywhere | 1 | Trails and Access |
| 6 | there needs to be signs on the Parkway everywhere -before the pilot goes in | 1 | Trails and Access |
| 7 | bike bridge -post advance warning signs for where bikes go so no ped conflict | 1 | Trails and Access |
| 8 | timing of pilot should be courtesy based | 1 | Trails and Access |
| 9 | if you establish a rainy season, will make it difficult for highschool groups. Will not be able to use because of their season. | 1 | Trails and Access |
| 10 | rainy season is best for mountain bicycling | 1 | Trails and Access |
| 11 | no direct bike access from Camp Pollock. Have to cross Northgate about a hundred yards. | 1 | Trails and Access |
| 12 | will there be info as to when trails are flooded? | 1 | Trails and Access |
| 13 | a couple of days after rain, best for mountain bikers | 1 | Trails and Access |
| 14 | don't want to damage the trails would love to help maintain trails. Establish work days? I would bring my kids. | 1 | Trails and Access |
| 15 | the ped trail is what people ride on it's only going to get worse | 1 | Trails and Access |
| 16 | equestrians and hikers shouldn't be allowed during rain season either | 1 | Trails and Access |
| 17 | rules should apply to all users Hidden Falls - great model | 1 | Trails and Access |
| 18 | fostercare groups - want to bring out to trails | 1 | Trails and Access |
| 19 | blanket policy - not going to work because we have dry years | 1 | Trails and Access |
| 20 | too sandy in summer. Weather closures should be related to surface type | 1 | Trails and Access |
| 21 | color code trail by surface type flexibility in indicating when trails are open/closed. | 1 | Trails and Access |
| 22 | want access from levee to pilot in Woodlake | 1 | Trails and Access |
| 23 | we do not have an impact monitoring plan. That is a lie. | 1 | Trails and Access |
| 24 | what can we do to take back that Northgate parking lot back from illegal campers? It has very good connectivity. | 1 | Trails and Access |
| 25 | don't think we should open more equestrian trails for bikers. | 1 | Trails and Access |
| 26 | would need to add yield signs if [equestrian path] west of NCA was open | 1 | Trails and Access |

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| 27 | if it's not a concern for equestrians it should not be a concern for bikers [regarding rainy season closure] | 1 | Trails and Access |
| 28 | need posted signage on Northgate and parking lot at Camp Pollock - okay to park and info on pilot | 1 | Trails and Access |
| 29 | want to do laps. | 1 | Trails and Access |
| 30 | Township 9 bike park could provide parking for cross country rides. Provide directions with a map. | 1 | Trails and Access |
| 31 | maint road? Is this open to pilot? <referring to Cal Expo equestrian/hiking trail on north side of Cal Expo parallel to Lathrop Way> | 1 | Trails and Access |
| 32 | make bike connection formal < reference to the informal trail connecting intersection of ND2 and ND1 nearest the river and the paved bike trail to the south> | 1 | Trails and Access |
| 33 | could there be a connection between Cal Expo and the trail? <reference to levee top and ND2> | 1 | Trails and Access |
| 34 | good test for multi-use bikes will yield to equestrians <reference to NC1/equestrian/hiking trail in Woodlake the majority section that is not proposed to be part of the mountain biking pilot> | 1 | Trails and Access |
| 35 | Is this still a fire road? <reference to an informal trail connecting NC1 and NC2 in Woodlake from the NC1 bend around the water/wooded area directly south to NC2> | 1 | Trails and Access |
| 36 | No access sign <reference to the ped/bike bridge connecting to the south of Woodlake. The trail leading into Woodlake should be signed no mountain bikes and direct to the first available path where it is okay to ride> | 1 | Trails and Access |
| 37 | i <add information point with pilot information and trail rules at south end of bike ped bridge connecting to Woodlake area> | 11 | Education and Enforcement |
| 38 | Joint Equestrian and mountain bike clinics | 2 | Education and Enforcement |
| 39 | Sac PAL - Coaching; good project vs Folsom <comparing the pilot's project location versus the state park in Folsom. Preferable to bring mentees to pilot location.> | 1 | Education and Enforcement |
| 40 | Relationship between Sac PAL + Rangers | 1 | Education and Enforcement |
| 41 | Grant High School Mtn Bike Club | 1 | Education and Enforcement |
| 42 | Orientation Session with rangers ARPF, Local bike shops, SABA and FATRAC Education | 1 | Education and Enforcement |
| 43 | Cal Expo gates info signs | 1 | Education and Enforcement |
| 44 | Education>signs | 1 | Education and Enforcement |
| 45 | improve no-bike signs systemwide online maps and education? | 1 | Education and Enforcement |
| 46 | Social media and REI | 1 | Education and Enforcement |
| 47 | color coding markers? | 1 | Education and Enforcement |
| 48 | bike patrol equivalent to horse patrol | 1 | Education and Enforcement |
| 49 | penalty for violation signage? | 1 | Education and Enforcement |
| 50 | camping and garbage concerns | 1 | Education and Enforcement |
| 51 | training and commitments for/from volunteers | 1 | Education and Enforcement |
| 52 | special event considerations install signs on restroom of parkway first? | 1 | Education and Enforcement |

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| 53 | relatability to other areas? Does this represent other portions? | 1 | Education and Enforcement |
| 54 | Most people don't read. Often vandalized. <Trail Rules and Information at Kiosks> | 1 | Education and Enforcement |
| 55 | Need more signage involving dogs Need more locations along trail Need penalties identified to encourage compliance city penalties on southside have discouraged dogs offleash ID penalties for violations Increase penalties to encourage compliance with rules <Signage (DRAFT)> | 1 | Education and Enforcement |
| 56 | Wide enough trails Sight line <User Conflict> | 1 | Education and Enforcement |
| 57 | DIRECT ACCESS! POSSIBLE PARKING SIGNS DIRECTIONAL <referring to Northgate area west of Woodlake> | 1 | Education and Enforcement |
| 58 | No bikes sign <from road adjacent to Costco parking lot and railroad tracks> | 1 | Education and Enforcement |
| 59 | No bike sign <just south of paved bike path, just west of railroad tracks in northeast Woodlake area at bend in NC4> | 1 | Education and Enforcement |
| 60 | ? <circle around proposed bike path where it diverges from NC3A and meets up again with the same firebreak> | 1 | Education and Enforcement |
| 61 | high school mntn. Bike teams need to do community service <a good resource> | 26 | Financial Sustainability |
| 62 | User groups will bring additional resources -staff model adequate | 23 | Financial Sustainability |
| 63 | increased use = more volunteers= more resources | 23 | Financial Sustainability |
| 64 | with biking legal - rangers won't have to police freeing up their time for other things | 16 | Financial Sustainability |
| 65 | decrease illegal use = decrease costs | 16 | Financial Sustainability |
| 66 | case studies show increased trail use decreases illegal camping/other uses | 15 | Financial Sustainability |
| 67 | See minimal ranger/maintenance staff - additional staff needed | 8 | Financial Sustainability |
| 68 | ranger/maintenance staff inadequate <Parkway wide> ranger-turnover salary not comparable | 6 | Financial Sustainability |
| 69 | self reporting from user groups free up ranger time | 2 | Financial Sustainability |
| 70 | area selected sets pilot program up for failure - b/c area has underlying issues that cost resources (not caused by mountain biking) | 2 | Financial Sustainability |
| 71 | <u>County-wide benefit.</u> Sac Police has mountain biking group which keeps kids out of gangs/trouble. Want to use this area for training. | 2 | Financial Sustainability |
| 72 | restroom is run-down b/c of illegal camping | 1 | Financial Sustainability |
| 73 | more garbage <cans> that cannot be rummaged thru. | 1 | Financial Sustainability |
| 74 | increased annual passes sold for people to park@ Discovery | 1 | Financial Sustainability |

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| 75 | porta potty by Cal Expo - gross | 1 | Financial Sustainability |
| 76 | volunteer trail work | 1 | Financial Sustainability |
| 77 | non authorized trails need to be well marked- otherwise they will invite use - especially b/c they are more interesting. Illegal camping trails exist and need to be fixed. | 1 | Financial Sustainability |
| 78 | baseline needed! There are current impacts/damage. - homeless may migrate south in areas. Volunteers available. | 1 | Environment |
| 79 | roads are not built for bikes - needs improvements strengthened and drainage added -prepped to minimize impacts | 1 | Environment |
| 80 | monitoring needed each year BEFORE season begins. | 1 | Environment |
| 81 | how to differentiate impacts caused by different users? | 1 | Environment |
| 82 | track # of homeless camps #311 reporting before and after increase or decrease impact? | 1 | Environment |
| 83 | How to count cyclists using area from paved path (not parking) | 1 | Environment |
| 84 | CSUS classes can help with monitoring | 1 | Environment |
| 85 | data from Folsom area to learn from | 1 | Environment |
| 86 | Tracking could be required of funded user groups (Serna set aside funds?) | 1 | Environment |
| 87 | biking might decrease homeless litter and bring positive (clean ups, invasive plant removals, interpretation activities) | 1 | Environment |
| 88 | Bikers volunteer | 1 | Environment |
| 89 | Is ranger patrol adequate for monitoring? Need more ranger presence | 1 | Environment |
| 90 | training program/ranger coordination vest/t-shirt for volunteer patrol | 1 | Environment |
| 91 | work together for common goals to fix area up fewer fires, less trash, less dogs impact to wildlife | 1 | Environment |
| 92 | addition of native plants - positive value can be added | 1 | Environment |
| 93 | trailer and carts legal? | 1 | Environment |
| 94 | how to determine impacts of bikers and campers? | 1 | Environment |
| 95 | will bikers be blamed for transient activities? - this area is already damaged don't want blame ex. Vandalism and litter (user conflict) different types of litter need to differentiate ex. Unauthorized trails - who makes it? Tracks look the same | 1 | Environment |
| 96 | rates and patterns of use- too difficult to monitor? | 1 | Environment |

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| 97 | <p><u>Parking</u> Please pin down where the designated parking areas will be and how the traffic flow will be routed and constrained I am concerned that vehicles will be crossing or traversing the levees. Also that bikes might damage the grassy levee slopes. Thank you for your effort.</p> | 1 | Miscellaneous |
| 98 | <p>Majority of Parkway users of lower reaches desperately need positive recreational nature viewing access, wildlife viewing is great in this area - <u>needs</u> to be more open + attractive, inviting, promoted - people need exercist, nature connection, we're real short on youth outreach on the lower reaches - mtn. biking <u>attracts</u> youth... their energy very positively.</p> | 1 | Miscellaneous |
| 99 | <p>Thank you for letting me voice my opinion regarding the possible new trails. We look forward to using the proposed trails and perhaps many more with the Sac PAL bike team. We want to use this valuable resource to help us mentor kids and keep them out of trouble.</p> | 1 | Miscellaneous |
| 100 | <p>Baseline assessment of impacts: need to determine b4+after impacts prior to bikes pilot program being implemented. Otherwise all impacts will be attributed to the pilot program.</p> | 1 | Miscellaneous |
| 101 | <p>I am a volunteer with the Wonder Program thru Sierra Families. We can't take our mentee out of the County and so access to the trails would be a great addition. I want to get my kid outside and on a mountain bike.</p> | 1 | Miscellaneous |
| 102 | <p>I don't see equestrians very often on the trails.</p> | 2 | Miscellaneous |
| 103 | <p>We certainly do not approve the mountain biking pilot program. Negative affects on wildlife, danger to walkers and runners on narrow path ways. The dust will be a problem. This is a terrible proposal for we property owners in this area. NO! on the Mountain Biking Pilot Program.</p> | 2 | Miscellaneous |
| 104 | <p>How can horses and mountain bikers use the same trails?</p> | 1 | Miscellaneous |
| 105 | <p>I try not to spook horses and be respectful.</p> | 1 | Miscellaneous |

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| 106 | Many illegal campers - what do rangers do about it? | 1 | Miscellaneous |
| 107 | with bikers on ped trail - there would be less litter and illegal campers more reporting would happen | 1 | Miscellaneous |
| 108 | bikers enjoy the wet conditions especially since this is a sandy area | 1 | Miscellaneous |
| 109 | like riding in the rain | 1 | Miscellaneous |
| 110 | Where can we say it's a success? When a bike comes I have to jump off to the side. What will the limitations be [to other areas of the Parkway]? The pilot trails seem side and little user conflict. Concerned pilot will extend to to other areas | 1 | Miscellaneous |
| 111 | want signage preventing mtn bikers to other parts of Parkway outside of pilot area? | 1 | Miscellaneous |
| 112 | How much would that cost? [referring to adding signage to other parts of Parkway outside of pilot area] | 1 | Miscellaneous |
| 113 | etiquette signs - need to be at kiosks @ information spots - education | 1 | Miscellaneous |
| 114 | can we adopt-a-trail like on other areas of the Parkway? | 1 | Miscellaneous |
| 115 | How is evaluation/monitoring funded? | 1 | Miscellaneous |
| 116 | How to measure? What determines success? Need metric. | 1 | Miscellaneous |
| 117 | resource impact monitoring program needs finished and implemented | 1 | Miscellaneous |
| 118 | more signage needed? | 1 | Miscellaneous |
| 119 | wildlife impacts? Measuring damage to habitat and vegetation enough? | 1 | Miscellaneous |
| 120 | CSUS - recreational use of natural resources" - class project? - good resource | 1 | Miscellaneous |
| 121 | will plans to monitor be in place finalized "ready" on Day 1? | 1 | Miscellaneous |
| 122 | maintaining roadways will damage vegetation. - not bikes. | 1 | Miscellaneous |
| 123 | damage to veg will occur off roads | 1 | Miscellaneous |
| 124 | Attached are my notes prepared from my review of the documents (i.e. Analysis and Proposal) that are in the public domain. They are offered in the hope of having the best pilot program possible that is based upon good data and information and which yields clear results for use by the public in considering off-paved trail bicycling in other parts of the Parkway. My apology for not making the workshop today. However, I hope you find these Notes useful as you prepare revised documents. Should you have any questions, please let me know. [Notes have been included as a separate document.] | 1 | Miscellaneous |

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| 125 | <p>I left you a phone message 2-1-16 with a question: does this Pilot Program provide mountain bikers legal access to equestrian/walking trails, where they are currently prohibited?</p> <p>This question is not answered in the Project information on the website, which is the same information I received from Liz Bellas.</p> <p>It is a simple yes/no question which was not answered in your reply message. I respectfully ask for an answer?</p> <p>I would also like to know what the difference is between a Public Workshop and a Public Hearing as mentioned in the last paragraph.</p> | 1 | Miscellaneous |
| 126 | <p>do you have an electronic copy of the project file that you can share? Trying to save the time and trouble of going to the front counter for review and comment of the document. Thanks to you and your department for looking to add sections of trails for mountain bikes!</p> | 1 | Miscellaneous |
| 127 | <p>Ok, thanks for the reply. I'll look for the documents later this week. I will also submit comments. I support this program and believe that more trails should be opened to mountain bikes.</p> | 1 | Miscellaneous |

NOTES
From Review of Regional Parks Proposal for
Off-Pavement Cycling in the American River Parkway
February 18, 2016

Sacramento County Regional Parks Department has issued an undated proposal, “American River Parkway Plan Off-Pavement Cycling Implementation Plan”, (the “Proposal”) and an undated “American River Parkway Plan Off-Paved Trail Analysis”, (The “Analysis”). These Notes result from the review of these two documents and relevant provisions of the American River Parkway Plan.

Summary of the Proposal

The Proposal will allow a new pilot program of off-paved trail bicycle use in the Woodlake and Cal Expo Areas in accordance with Policy 5.17 of the American River Parkway Plan in order to determine the viability of off-paved trail bicycling throughout the remaining Areas of the American River Parkway. The Proposal is to use existing maintenance and fire roads, an existing closed Parking lot at the westernmost end of the Woodlake Area, and one (1) acre of the Cal Expo overflow grass parking area located at the eastern end of the Cal Expo Area, both for vehicle parking. The Cal Expo Area includes Bushy Lake.

The Proposal provides that County Regional Parks will implement a “comprehensive plan of signage, map distribution, and public outreach.” Regional Parks will improve the kiosk at Ethan Way trailhead as a focal point for off pavement bicycling information, post and regularly update information at the Northgate/160 trailhead and the mid Woodlake kiosk, including information on the pilot program season opening and closing dates.¹

The Proposal provides that County Regional Parks will “fund and install enforcement and directional signs throughout the project area”, “fund and distribute printed brochures” at “kiosks, at bicycle shops and at other suitable locations” and pay costs of enforcement, maintenance, and environmental monitoring.² Trail cameras will be installed and used to monitor authorized and unauthorized trail use.³

The Proposal provides for organized Group Rides that receive permits in accordance with County requirements (e.g. Special Event, Group Activity, and Professional Instruction permits are currently authorized by County Ordinance).

Prior to opening the Proposal Areas to use by off-paved trail bicyclists, Regional Parks will identify environmentally sensitive zones and document the environmental conditions of such zone through use of digital photographs with captions.⁴ The Proposal provides that Regional Parks’ will provide ongoing ranger staff consistent with existing coverage in the Woodlake and Cal Expo Areas⁵ to regularly patrol the “trail network” in these areas⁶.

¹ “Proposal”, page 1, Section V, “Education”

² *Ibid*, page 4, Section VII, “Funding”

³ *Ibid*, page 2, Section VI, “Monitoring and Environmental Protection”, “Environmental Monitoring”, third paragraph, last sentence

⁴ *Ibid*, page 2, Section VI, Monitoring and Environmental Protection”, “Environmental Monitoring”, second paragraph

⁵ “Analysis”, page 3, paragraph following recitation of American River Parkway Plan Policy 5.17(b)

The Proposal provides that Regional Parks' staff will be responsible for environmental monitoring of the off-paved trail bicycling activities with the assistance of "volunteer users" and will report and address maintenance and public safety issues.⁷ Table 1 in the Proposal identifies the Environmental Monitoring Plan for the new pilot program.⁸

Regional Parks' staff will meet with stakeholders at least twice a year, perhaps more if situations warrant, to discuss enforcement issues, environmental concerns, and any other issue relevant to the new pilot program of off-paved trail cycling.

The Proposal includes maps (i.e. Woodlake Area and Cal Expo Area) showing locations of off-paved trail cycling.

The Proposal provides that all costs and liability risks are to be borne and paid by the County Regional Parks Department.⁹

NOTES

1. Recitation of applicable parts of Parkway Plan is incomplete.

- a) The safety concerns discussed in Chapter 8, "Public Access and Trails" do not appear to have been recognized.

These concerns (e.g. "Conflicts may arise between these [joggers, equestrian/hiking] different modes of recreation as increasing numbers of people use the trails.") should have been identified in the Analysis and evidence provided how such concerns will be mitigated by the Proposal.

- b) The requirements of Parkway Plan Policy 5.14 regarding signage and separation of bicycle and equestrian/hiking trails appears not to have been recognized.

The maps provided in the Proposal show sections of the off-paved trail bicycling routes that (a) are close to or on the equestrian/hiking trail or paved bicycling trail or (b) cross the pedestrian, equestrian/hiking, and paved bicycle trails. The Analysis should provide evidence how safety concerns will be mitigated by the Proposal.

2. Consideration of the Proposal needs to take into account the long term consequences of adding off-paved trail bicycling as a new use in the entire Parkway, not just the Areas described in the Proposal.

It is unrealistic to assume that, once off-paved trail bicycling is approved/sanctioned as a new use at any location in the Parkway, Regional Parks can "unring the bell" and revert to the current conditions by subsequently prohibiting the new use and posting signs to such effect.

⁶ "Proposal", page 2, "Monitoring and Environmental Protection", "Environmental Monitoring", second paragraph

⁷ "Proposal", page 2, Section VI, "Monitoring and Environmental Protection", "Environmental Monitoring", first paragraph

⁸ *Ibid*, page 3, Section VI, "Monitoring and Environmental Protection", first paragraph

⁹ *Ibid*, page 4, Section VII, "Funding"

Currently, the Parkway Plan does not allow/sanction off-paved trail bicycling anywhere in the Parkway except in the Woodlake Area and Cal Expo Area subject to the conditions specified in Policy 5.17. The Analysis states that results obtained as a result of the Proposal will be used to determine if off-paved trail bicycling should be allowed in other areas of the Parkway

The Analysis provides no evidence supporting a conclusion that off-paved trail bicycling will not expand anyway to other Areas of the Parkway when bicyclists see others riding bicycles on maintenance and emergency service roads in the Woodlake and Cal Expo Areas. This will result in greater enforcement burdens on maintenance and Ranger personnel in other Areas of the Parkway.

The Proposal, while ostensibly a limited duration pilot project, is in fact a new use that will be viewed as an approved/sanctioned use throughout the Parkway, not just in the Woodlake and Cal Expo Areas. Hence, consideration of the Proposal must take into account the long term consequences of this new use in the entire Parkway.

3. The Analysis concludes that all funding to support and monitor the off-paved trail bicycling in the Woodlake and Cal Expo Areas will be from the existing County Budget.

Policy 5.17(b) specifies that additional funding to “support and monitor” the off-paved trail bicycling is to be acquired as part of the Proposal. Policy 5.17(b) does not specify who is to provide the additional funding.

The concept of “support and monitor” clearly means: Funding necessary to (a) full implementation of the Proposal and (b) implement the monitoring needed to ensure compliance with the Parkway Plan (including the conditions of approval) is to be identified and acquired prior to approval of the Proposal. Put another way, these costs and funding requirements would not exist in the absence of a Proposal to add off-paved trail cycling as a new use in the Parkway.

The Proposal and Analysis identifies the following sources of costs to be paid by the County Regional Parks Department but does not quantify any dollar amount for the following:

1. Costs of implementation of the Environmental Monitoring Program described in the Proposal to the extent not borne by “volunteers.”
2. Costs of production and installation of signs, production and distribution and periodic updating of printed materials.
3. Costs associated with Regional Parks’ maintenance and Ranger personnel.
4. Costs of identification and documentation of environmentally sensitive areas.
5. Costs of procurement and installation of trail cameras and monitoring, analysis, and reporting of results.
6. Preparation for and conduct of meetings with Stakeholder groups at least twice/year.
7. The amount of potential loss or damage that could be sustained by the County due to accidental death or injury occurring as a result of approval/Sanctioning of a new use.

The Proposal and Analysis appears to dismiss the risk of financial consequences of liability for damage or loss involving the off-paved bicycling conflicts with existing pedestrian, equestrian/hiking, or bicycling users and provide no estimate

the liability exposure that the County will be assuming as a result of the approval of the new use Proposal.

8. Costs to implement the Public Notification Procedures previously approved by the County Board of Supervisors.

The Proposal provides that all funding for the three year pilot project is to come from the Regional Parks annual Budget approved by the County Board of Supervisors. This is a multi-year commitment by staff. Regional Parks' budgets are subject to annual review and approval/disapproval by the County Board of Supervisors and have not been stable in the past. How can the annual budget approval/disapproval process be relied upon as "acquired stable funding" for the Proposal?

It should be noted that at no time during public consideration of the FY 2016-2017 Regional Parks Budget did Regional Parks, other County staff, or the Board of Supervisors disclose that the off-paved trail bicycling pilot project would be funded by the FY 2016-2017 Regional Parks Budget.

4. **The Analysis and Proposal contain conclusions but provide no evidence that would enable independent confirmation of the validity of such conclusions. A Public Records Act request may be needed in order to obtain said evidence.**

a) Conclusions Re: Public Safety

The Analysis does not provide information or data which would justify the lack of concern for public safety shown in the Proposal and Analysis. It would appear that the intent is to have the County Parks, and hence the public, is to bear the financial consequences of liability arising from accidents that may result from this new program/use. It is also possible, that if the liability is realized, that the County may prohibit equestrian/hiking and pedestrian use on the maintenance roadways identified in the Proposal.

The Proposal references a visual survey by Regional Parks Department staff but provides no evidence supporting the stated conclusion in the Proposal that "no safety issues were identified." For example: When was the survey conducted? Where are the photographs showing no safety issues? What is the expertise of the person(s) making the survey?

The Analysis does not address how the Proposal will ensure compliance with Policy 5.14 of the Parkway Plan or how public safety at the intersections of the proposed off-paved trail cycling trail and Pedestrian, Equestrian/Hiking, and paved Bicycle Trails.

b) Conclusions Re: Enforcement

The Analysis provides no evidence or data to support the conclusion at bottom of page 3 of the Analysis that: "Additional funding for law enforcement will not be needed by the department to monitor the mountain biking trails." Further, the commitments contained in the Proposal and compliance with the Parkway Plan will be enforced using "ongoing ranger support consistent with our [Regional Parks Department] coverage in the Woodlake and Cal Expo" Areas.

The real issue is how existing Ranger staffing will be able to effectively enforce the conditions associated with approval of the new use including compliance with all Parkway Plan policies. This is especially relevant to the deployment of Rangers (e.g. Ranger activities south of the River while the affected areas are north of the River and the number of Rangers available on the Parkway from Hazel Avenue to the confluence on any given day at any given time).

The Proposal seems to rely greatly upon signage to secure compliance on the part of the off-paved trail bicyclists. This seems to be inconsistent with the public statements regarding the increased drownings that have occurred in the River even with additional signage advising of the increased risk of drowning.

Also, the conclusions described in the Analysis and Proposal seem at best to be inconsistent with past representations regarding lack of Ranger staffing to adequately deal with illegal camping in all areas of the Parkway and lack of ability to enforce requirements of the Parkway Plan. This is especially true when the 2 vacant Ranger positions, according to the Analysis, seem to have no effect on the ability to police the Parkway. If the Analysis is to be believed, there is no need for additional Park Rangers and the 2 vacant Ranger positions are not needed for the American River Parkway.

c) Conclusion Re: Effect on Illegal Camping Activity

The Analysis, on page 4, assumes, without evidence, that increased recreational activity in the Woodlake and Cal Expo Areas will make illegal camping in these areas less frequent. Without evidence, this is conjecture. One need only look to the illegal camping that occurs in the City where people are concentrated so see that the presence of people does not work do discourage illegal camping.

Also, this conclusion ignores the fact that illegal camps are established after dark when the Parkway is closed by County ordinance when off-paved bicyclists are not in the Parkway, or at least not supposed to be.

The Analysis provides no description of the means and data that will be collected and by whom, in order to provide evidence via the Proposal if this is in fact the case and not the result of increased Ranger enforcement of illegal camping.

If this conclusion is shown to be false (i.e. illegal camping does not abate as a result of implementing the Proposal), Regional Parks will not be able to stop the off-paved trail bicycling use. See Item 2 preceding for further discussion.

d) Conclusions Re: Parking Lots

The Analysis at the bottom of page 4 states that the maps in the Proposal for both the [Woodlake and Cal Expo] area plans incorporate the use of existing parking lots. The existing paved parking lot located at the westernmost end of Woodlake is closed to public use. The parking area identified at the easternmost end of the Cal Expo Area is limited to 1 acre in size and is not paved.

The Analysis provides no description of the re-opening of the Woodlake Parking Lot, what effect this will have, and if the reasons for the closure no longer exist. The Analysis provides no description of the Cal Expo parking area and the provisions of law (Bushy Lake Preservation Act) affecting its use.

The Analysis appears to presume that cost impacts associated with these two parking lots are not significant, makes no mention of the cost impacts, and does not identify the modifications to occur at the two parking lots.

The Analysis is silent regarding the potential for increased parking on streets and in neighborhoods. Experience indicates that other users park on neighborhood streets outside of the Parkway to avoid the Parking Fee (currently \$5 per vehicle). There is no evidence that these users will be any different. The Analysis needs to evaluate this tendency.

e) Conclusion that New Off-Paved Trail Bicyclists will be more than 100 in number

The Analysis states on page 7 that the number of new users will be more than 100. The Analysis provides no evidence supporting the derivation of this number of new users. Also, the Analysis does not attempt to identify a maximum number of off-paved trail bicyclists that can be accommodated by the Proposal.

5. Quantitative information showing compliance with the requirements of Policy 11.5 of the Parkway Plan regarding identification of financial resources to operate and maintain new facilities and programs needs to be provided.

The pilot program described in Policy 5.17 and the Proposal would be a new program with additional costs that the Regional Parks Department plans to absorb. These costs were not identified in the FY 2016/2017 Budget for County Regional Parks. Hence, the costs to be borne by County Parks will necessitate reduction in the financial, maintenance and Ranger personnel resources available for other areas of the American River Parkway and other parts of the Regional Parks System.

The Analysis should quantify all costs to be absorbed by the County, revenues expected to be generated by the Proposal, and identify reductions that will be necessary in other areas of the Regional Parks System, including the remainder of the American River Parkway.

6. Failure to Comply with Parkway Plan

a) No provision for approval of the Proposal by the Board of Supervisors

Page 3 of the Analysis only provides for approval of the Proposal by the County Department of Regional Parks.

Policy 5.17 requires that the Proposal be identified on approved Area plans which require a public approval process. The existing Area Plan Maps for the Woodlake and Cal Expo Areas do not identify the Proposal activities and the facilities. Hence, Area Plan Maps for these two areas need to be amended and amended Area Plan Maps approved by the County Board of Supervisors.

Also, the maps provided in the Proposal are different than the Area Plan Maps that are publicly available. Public review of the Proposal would be facilitated if County Parks were to overlay the Proposal on maps that are publicly available.

The staff Proposal is a multi-year commitment to budget funds needed to implement the Proposal. However, the Board of Supervisors annually approves/disapproves of Regional Parks' budget proposals. At a minimum, the Proposal needs to be submitted to the Board of Supervisors for approval so that

(a) the Board is informed of the multi-year commitment and increased liability exposure, and (b) the public can rely upon the Board's action as supporting the environmental and financial costs associated with the new use.

Also, the plans described in the Analysis to modify Parkway Plan policies must be submitted to the Board of Supervisors for approval before submittal to the Legislature and Governor for approval.

b) Off-Paved Trail Cycling Use in Nature Study Area

The map provided in the Proposal for the Cal Expo Area identifies off-paved trail cycling as an allowed use in the Nature Study area around Bushy Lake. The Parkway Plan provides that Trails Recreation activities in Nature Study Areas are limited to pedestrian and equestrian/hiking use on Designated Trails ONLY.

The Proposal must be modified to eliminate off-paved trail bicycling use on maintenance and emergency roads within the Nature Study Area surrounding Bushy Lake otherwise it is not consistent with the Parkway Plan.

c) Erroneous Description of Trails Recreation Activities

The Analysis includes an erroneous description that leads to the conclusion that "off-paved trail bicycling" is an allowed/sanctioned recreational activity throughout the Parkway within the "Trails Recreation" classification.

Allowable/Sanctioned Trails Recreation activities are defined in Chapter 3 of the Parkway Plan as "walking, running, horseback riding, hiking, bicycling and inline skating" on "Designated Trails only in the Limited Recreation, Developed Recreation and Protected Area land use categories.

Three "Designated Trails" are identified in Chapter 8 of the Parkway Plan: — Pedestrian, Equestrian/Hiking, and Bicycling which is understood, as a result of usage in the balance of the Parkway Plan, to be the paved Jedidiah Smith paved bicycle trail.

Off-paved trail bicycling, therefore, is allowable only in the Proposal Areas and only in accordance with an approved pilot project that is consistent with Policy 5.17 of the Parkway Plan and the balance of the Parkway Plan policies. Off-paved trail bicycling is currently not otherwise an allowed Trails Recreation activity in the Parkway.

d) No authority for Regional Parks' staff to modify Parkway Plan policies

The section of the Analysis titled Environmental Impacts states that the Policies set forth in the Parkway Plan are being modified by County staff. This is not consistent the provisions of State Law (Urban American River Parkway Preservation Act) and the Parkway Plan.

State Law provides that modifications or changes to the policies set forth in the Plan must be approved by the Board of Supervisors, California Legislature and Governor before the changes to the policies can be made. County staff have NO authority to unilaterally modify the Parkway Plan policies.

e) Environmental Monitoring Plan does not Address Animals and Birds

The Environmental Monitoring Plan in Table 1 of the Proposal makes no mention of the animals and birds which are part of the natural resources of the Parkway that are to be protected. The Monitoring Plan only references "damage to vegetation."

The Environmental Monitoring Plan needs to be revised to include animals and birds and not just vegetation. Otherwise it is not consistent with the Parkway Plan.

- f) “Mountain biking” is a term that is not used in Parkway Plan.

The Parkway Plan uses the term “off-paved trail bicycling” and thus focuses on the use and not the type of bicycle and avoids picking one kind of bicycle over another.

The Proposal and Analysis need to be modified by deleting all references to “mountain biking” in favor of “off-paved trail bicycling.”

- g) The use of “mountain biking trails” and “natural surface bicycle trails” are terms that are not used in the Parkway Plan.

The Analysis and Proposal make liberal use of “mountain biking trails” and “natural surface bicycle trails” when referring to maintenance and emergency roadways that are proposed for off-paved trail bicycling use. The Parkway Plan provides that the new off-paved trail bicycle use is to occur on “maintenance roads and emergency roadways” in the Woodlake and Cal Expo Areas. The design of the Proposal specifically refers to use of existing maintenance and fire roads.

Use of “mountain biking trails” and “natural surface bicycle trails” is not consistent with the Parkway Plan and all such terminology must be changed to “maintenance roads and emergency roadways” to be consistent with the Parkway Plan.

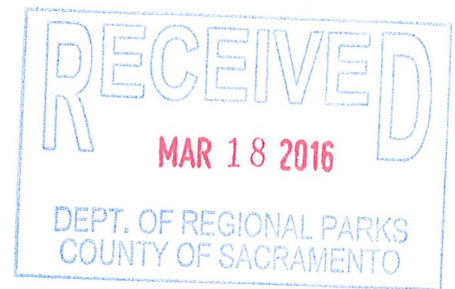
7. Questions

- a) The Analysis on page 5 makes no provision for sharing data and information with stakeholder groups during the course of the pilot program.
Why wouldn't the Regional Parks Department want to share the ongoing results with all stakeholder groups and not just the affected user group?
If one user group is so involved, all should be afforded the same opportunity.
- b) Have emergency service providers (e.g. the two fire departments, police departments, Sherriff department) been afforded the opportunity to review the Proposal and provide recommendations for conditions that they believe are needed in order for them to provide emergency services to the affected Areas?
- c) What provisions have been included for ADA access to the new use? If none, how is the lack of ADA access consistent with the provisions of Parkway Plan Policies 8.17 and 8.26?
- d) What steps have been taken by Regional Parks Department staff to comply with the Public Notification Procedures adopted by the County Board of Supervisors on March 11, 2009? What steps remain to be taken?
- e) Who are the “volunteer stewards” identified at the top of page 6 of the Analysis?
If they are the ARPF volunteer stewards, they should be so identified. If they are off-paved trail bicyclists, they should be so identified. The same holds true for volunteers from any other group.

- f) The commitment to the Environmental Monitoring Plan in the Proposal relies on volunteers and seems, in many instances, to require a large number of volunteers. Where will these volunteers come from and who will train them to recognize environmental damage when they see it?
- Will County Regional Parks take over, fund, and perform the work if there are insufficient numbers of volunteers? If not, how can the public rely on the Monitoring Plan to provide reasonably reliable information to evaluate the Proposal and decided if off-paved trail bicycling has a positive, negative, or neutral impact on the Parkway?
- g) What commitments have been given by Regional Parks to off-paved trail bicycling enthusiasts regarding the Proposal? What commitments have been given by such enthusiasts to Regional Parks regarding the Proposal? The discussion on page 4 of the Analysis indicates a predisposition to consider the use a “positive activity” before the pilot project has even started.
- h) What are the contents of the “rules of the trail network”? Please see top of page 2 of the Proposal.
- i) What is the routine Ranger deployment (e.g. frequency, duration, number, etc.) that constitutes the “current Ranger coverage” in the Woodlake and Cal Expo Areas? Routine deployment occurs in the absence of calls for service.

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Group Comment
Submitted by mail
March 18, 2016



Jeff Leatherman, Director
Sacramento County Regional Parks
4040 Bradshaw Road
Sacramento CA 95827

Dear Jeff:

The Woodlake Neighborhood Association would like to go on record in support of the efforts of the local bicycle advocates and Sacramento County Parks to implement the mountain bike pilot project in the Woodlake and Cal Expo reaches of the Lower American River Parkway, in accordance with the American River Parkway plan. We support your efforts to bring this vision to fruition as rapidly as possible.

As advocates for neighborhood closest to the proposed project area, we recognize the importance of quality recreational experiences, especially for young people—to efforts to reclaim this section of the Parkway for law-abiding tax-paying citizens. Our neighborhood is most impacted by the ongoing problem of illegal camping in the Lower Parkway hinders our efforts to enhance North Sacramento. The Parkway here does not offer the same recreational experience as it does further up river. Because it feels unsafe, it perpetuates a cycle which keeps people away and actually does make the Parkway less safe. We need a new plan which is inclusive, and will activate this area with law-abiding citizen-stewards. The cycling community seems ideal for this task.

We understand the concerns raised by upstream environmentalists. They do not often visit our section of the Parkway. They prefer to shut out new user groups, but that has actually resulted in environmental degradation here. Allowing bicycles on existing and reconfigured dirt trails and roads which are mostly flat will have virtually no environmental impact, particularly with the mitigations written into the Plan. We encourage your continued collaboration with the mountain bike community, which has a history of volunteer involvement and environmental stewardship.

We hope you will take all possible steps and considerations to allow the mountain biking community to build a world-class recreational resource. Our Parkway needs help. In these times of dwindling public resources, it is smart to embrace groups which play by the rules, apply for grants, and bring able-bodied volunteers and visitors to our Parkway. We'd like to join Manhattan, Seattle and Austin, Texas as cities who can boast of a quality mountain bike trail network within their borders.

Thank you for your consideration.

Sincerely,

Bill James

WNA Pres

Woodlake Neighborhood Association