



South Land Park
Neighborhood Association

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SACRAMENTO, CA 95822

July 5, 2018

Mr. Tom Buford
City of Sacramento
Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

The South Land Park Neighborhood Association (SLPNA) submits this letter in response to the City's NOP for the Del Rio Trail Project (Project). We are a volunteer-run, nonprofit neighborhood association representing an area of approximately 14,000 residents. SLPNA has been involved in the City's community outreach and discussions of the Project to-date. The City has been listening to the ideas and concerns of all involved in the outreach, and has done a re-design of the conceptual plan for the purpose of historical preservation of the abandoned rails. SLPNA strongly supports the design and construction of a bicycle and pedestrian trail that becomes an asset for both the local neighborhood and the City of Sacramento at large.

Project Context in the Regional Trail Network

SLPNA believes the EIR should put the Project in context of its importance at the local, City, and regional levels. The Del Rio Trail will not be an isolated trail used only by the local neighborhood. The Project is an important connector south of the downtown core in both the City's Bicycle Master Plan (2016), and Sacramento County's Bikeway Master Plan (2011). The Project is listed as a priority for near-term implementation in the City's Draft Bicycle Master Plan Implementation Plan (2018).

The American River Parkway is the "backbone" of our region's Class 1 multi-use trail network (about 29 miles from Old Sacramento to Folsom). Two other existing Class 1 trails serve north Sacramento and Rio Linda (Sacramento Northern and Walter Ueda, together about 12 miles).

From downtown, the Sacramento River Parkway trail extends about 3.5 miles south. The Del Rio Trail would extend the network another 4.5 miles south, and connect to an existing 2.5 mile trail on the River serving the Pocket neighborhood, and the new Delta Shores Project trail network that is already approved. From Day 1, the Del Rio Trail will be part of a 50+ mile Class 1 trail system connecting much of the region.

New trails planned in Delta Shores and Pocket/Greenhaven will directly complement the Project and further expand the network to serve more residents and neighborhoods. The network will extend from Folsom to Freeport, with only a few short breaks in the Class 1 off-street trail. With the Del Rio Trail connecting large areas in the south of the City, the regional trail system will gain a size and connectivity that makes it one of our premier assets and attractions.

Regional Attitudes about Civic Amenities

Last year Valley Vision produced a report entitled “Regional Attitudes about Civic Amenities” (2017). The report conducted a poll throughout the region, and attention was given to non-English speakers, gender, race/ethnicity, and age in order to adequately represent the population. When asked to rank the single most important civic amenity to their quality of life, 54% of respondents ranked parks and trails as #1. A distant second was science and history museums at 9%. Urban parks and greenbelts were the single most frequently used amenity by the respondents. Parks and trails are relatively inexpensive compared to other amenities. The City, and the region, gets its biggest “bang for the buck” with projects like the Del Rio Trail.

Expected Use and Separated Pedestrian/Bicycle Paths

SLPNA expects, and is excited, that the Del Rio Trail will be well-used. We expect several general classes of users, and encourage the City to consider how all of their needs are addressed by the Project design and the alternatives. The Project, in combination with the existing Sacramento River Trail, will create a direct Class 1 trail into downtown for bicycle commuters. The Project, embedded in residential neighborhoods, will also be a recreational amenity for adults and children (both on foot and bike), dog-walkers, and runners. More advanced cyclists will use it on long-distance rides, and to reach rural Delta roads via the Freeport Bridge. Due to the access that the Del Rio Trail will provide to multiple grocery-anchored shopping centers, we also expect more use by local “errand-runners” than exists on some other trails.

We have heard from City transportation specialists and parks staff that the single most common complaint the City gets on combined bicycle/pedestrian paths has to do with conflicts between bicycles and pedestrians. In order to improve this situation in the future, it is the City’s intent to separate these uses onto separate trails wherever possible, including on the Del Rio Trail. SLPNA has heard a similar story from our membership, where the separated trail design is very popular. The City’s reasons for including separated paths wherever possible should be explained in the EIR, and an alternative should be included that maximizes separated paths.

A Note About Homelessness

Homelessness is a complex issue that affects the entire City. Homeless people sometimes camp in various locations along the Project corridor in somewhat hidden locations. That is the Project baseline condition for the EIR.

SLPNA does not believe the Project will attract more homeless people. Claims have been made that the Project will turn into a homeless camp comparable to the lower American River Parkway, simply because there is a bike path there. Many other City bike paths and greenbelts, including the upper American River Parkway, have relatively few or no homeless camps. The reason is that bike paths do not attract the homeless, secluded camping sites do. The homeless are attracted to camping on the lower American River Parkway because there is a dense forest for camping out-of-sight, and the proximity to homeless services nearby. We believe the Del Rio Trail, by “opening up” the abandoned rail corridor, and making it far more usable by neighborhood residents, will discourage homeless camps.

Conceptual Designs to-Date, and the Issue of Trains

In December 2017, the City held a meeting with the California State Railroad Museum Foundation (CSRMF). CSRMF is a non-profit organization affiliated with the California Department of State Parks (State Parks). At the time, the City’s conceptual design for the Project would have retained about 50% of the old railroad (RR) tracks. CSRMF expressed their desire for greater preservation of the railroad tracks in a January 2018 letter to the City. In response to CSRMF, the City produced a second conceptual design that retained about 98% of the RR tracks and had another meeting with CSRMF in April 2018. In response, CSRMF wrote a letter to the City in May 2018 that requested 100% RR track retention, and asked the City to “show that the rail line could potentially be viable again under the right circumstances” as part of the Del Rio Trail Project. In addition to 100% RR track retention, CSRMF’s May 2018 letter requested that:

- 1) Flangeways be installed on all street and trail crossings of the RR tracks “to signify potential future use of the track”,
- 2) Necessary trail crossings of the RR tracks be realigned perpendicularly,
- 3) The RR tracks not be used for a walking path,
- 4) No landscaping or wildflower seeding occur in the RR tracks,
- 5) The City allow the RR Tracks to be maintained and repaired,
- 6) The City grant right-of-way for “future use and reconstruction of the tracks.”

The Project purpose and need clearly identify that the Project is a pedestrian and bicycle project. None of these items address the Project purpose and need, and the implementation of some would hinder design of the Project. These items address a separate venture that CSRMF envisions that would allow train traffic in some distant future. In 2014 California State Parks adopted a 20-year General Plan and EIR for the Old Sacramento State Historic Park (SCH

#201009206). The Draft EIR for that project considered returning limited train traffic to the abandoned RR tracks south of Sutterville Road and north of the town of Freeport in order to provide support services for a proposed tourist excursion train from Meadowview Road to the town of Hood. After significant neighborhood opposition to that component of the Plan, and a finding that noise impacts in the South Land Park area would be “significant and unavoidable” with “no feasible mitigation” State Parks removed the proposal for return of train traffic within the Project limits from the Final Plan and EIR (*ibid.*)

The City should not design the Del Rio Trail around a proposed train project that was rejected by the very State agency that operates the Old Sacramento excursion train. The City should design the Del Rio Trail to best serve the Project purpose and the needs of pedestrians and bicyclists. We are aware the abandoned RR tracks are considered a historical resource. SLPNA supports the incorporation of the RR tracks, and the development of a RR theme, into the Project to the extent this can be accomplished without jeopardizing public safety or sacrificing overall trail design.

Recommended Alternatives

The City has already developed **two conceptual designs** of the Project. It is appropriate for the City to consider both of these conceptual designs as Project Alternatives. In general, the two design alternatives are:

1. The first conceptual design developed by the City that maximized the Project’s service to pedestrians and bicycles and most directly addressed the stated purpose and need. This design retained about 50% of the RR tracks.
2. The second conceptual design developed by the City. This design made sacrifices in the trail’s service for pedestrians and bicycles, but retained about 98% of the RR tracks.

SLPNA encourages the City to include **both** of these alternatives in the EIR.

Potential Mitigation

The primary concerns the local neighborhood has with the Project are issues of privacy and security. These are already baseline issues with the Project corridor. However, Project design should not worsen the existing conditions, and may be able to improve them. SLPNA is appreciative that the City design team has been consulting with the Police Department and City Parks Rangers on this issue. **The following ideas could be incorporated into the Project design, or used as mitigation measures, under any alternative:**

1. In general, trees and shrubs should be retained. We recognize some vegetation removal is necessary for the Project. The vegetation provides a privacy screen along many of the adjacent backyards. Pruning of lower tree canopies up to a height (about 5–6 feet) just below that of backyard fences would give the Trail a clean, well-kept look while still retaining privacy.

2. Multiple residents have expressed a desire to showcase the natural vegetation of the area, especially valley oaks. The Sacramento Tree Foundation expects to plant some native valley oaks and black walnuts in the corridor in Autumn 2018. SLPNA intends to coordinate volunteers for the effort. The Project design could identify future locations for native tree and shrub planting specifically for enhanced privacy, even if the Project did not plant the vegetation directly. The Sacramento Tree Foundation has told us they are always short of planting locations, and the Del Rio Trail could be “planted out” with trees over the course of years.
3. In several locations the existing grade in the Project corridor is higher than the adjacent backyards. Where feasible, the grade should be lowered so that Trail users would not be able to see into backyards and windows.
4. Placing the pedestrian path in the RR tracks is a way to maximize track preservation, but it also creates privacy issues, as in many places the tracks are at the highest point in the corridor. At such locations, the Project should consider removing the RR tracks, lowering the grade, and then re-installing the tracks and constructing the pedestrian path. In some locations along the corridor, this could allow for 1) track preservation, 2) a separated trail, and 3) privacy to all be achieved.
5. Different designs and materials should be considered for incorporating the existing RR tracks into a pedestrian path. The utility and safety of the design should be paramount. Aesthetics is also a consideration.

Cordially,



BRIAN EBBERT

President

South Land Park Neighborhood Association

cc: Darrell Steinberg, Mayor
Jay Schenirer, Council District 5
Steve Hansen, Council District 4
Rick Jennings, Council District 7
Larry Carr, Council District 8
Assembly Member Jim Cooper
Senator Richard Pan
Secretary John Laird, Natural Resources Secretary
Lisa Mangat, State Parks Director
Julianne Polanco, State Historic Preservation Officer