



South Land Park
Neighborhood Association

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SACRAMENTO, CA 95822

May 14, 2018

Jesse Gothan
City of Sacramento
Sacramento, CA

Dear Mr. Gothan:

The South Land Park Neighborhood Association (SLPNA) has reviewed two letters sent to the City regarding the Del Rio Trail Project from the California State Railroad Museum Foundation (CSRMF). The first letter was sent on January 19, 2018. The January letter lays out CSRMF's position that none of the remaining railroad (RR) track should be removed, regardless of any other engineering, traffic, or access constraints that may exist along the route, particularly at road crossings or other proposed Trail access points. CSRMF's January letter makes it clear that their position of 100% track preservation of remaining track is a result of their desire for historical resource preservation. CSRMF states in the January letter that the track is missing in one section of the route. SLPNA notes that other sections are paved over or missing at road crossings, and trees grow in the tracks in some places. CSRMF concludes their position in their January letter with:

"Furthermore, when Regional Transit transfers ownership of the right-of-way to the City, the city alone will have control over future uses of the tracks and the corridor. Therefore, preservation of the tracks is not a referendum on an excursion train."

Based on CSRMF's January letter, the City re-designed much of the proposed Trail in order to preserve about 98.2% of the remaining tracks. CSRMF is not satisfied. CSRMF's May 9, 2018 letter explicitly states that the Del Rio Trail should be designed to "show that the rail line could potentially be viable again", even though CSRMF acknowledges that no one, including themselves, is anticipated to propose trains using the tracks for the foreseeable future. CSRMF's changed position is stated in their May 2018 letter:

"Though your project team has made great progress to preserve the rails, the Foundation's Old Sacramento Committee and Board believe the City needs to do more to preserve not just the idea that the Del Rio Trail corridor was once a

viable rail line, but also to show that the rail line could potentially be viable again under the right circumstances. Though we do not anticipate that we or anyone else would propose use of the tracks for the foreseeable future, we do not want to foreclose future possibilities which, of course, would be subject to the full political and environmental process.”

Based on CSRMF’s May letter, it seems that preservation of the tracks is now becoming “a referendum on an excursion train.” It is not, nor should it be, the City’s purpose on a bicycle/pedestrian trail project to “show that the rail line could potentially be viable again under the right circumstances.” There is only one entity that would propose use of the tracks, and that is State Parks, the agency that operates the Old Sacramento Excursion Train. State Parks, the agency that operates the current excursion train subjected the return of trains to the Environmental Impact Report (EIR) for the Old Sacramento State Historic Park General Plan Project (SCH#2010092068) in 2014 that proposed returning train traffic to the entire route. There was substantial community opposition to the return of trains. As a result, State Parks removed the return of trains to the roughly 4.5 mile route of the Del Rio Trail from their project. Further in the May letter, CSRMF asks the City to not only make sacrifices in the Trail design for bicycles and pedestrians, but to install new flangeways for rail traffic.

The City of Sacramento, and the region, has a good east-west bicycle/pedestrian “backbone” in the American River Parkway. The Sacramento River Bike Trail extends that backbone south as far as Scott’s Seafood, but connectivity to neighborhood residential and commercial uses is constrained by I-5. The Del Rio Trail Project not only extends the backbone another roughly 4.5 miles, but greatly increases connectivity because it is embedded within existing neighborhoods. It will further connect to other bicycle/pedestrian that are somewhat isolated, including the trail along the Sacramento River near the water tower, and the new Trail network that will be built as part of the Delta Shores development. **Making design sacrifices for a project that was rejected by the project’s own operator, State Parks, is not good public policy.** What CSRMF is requesting will increase costs while diminishing the utility of the Trail. Their position is that they do not object to the Del Rio Trail, as long as it is turned into a plan to return train traffic, with a bicycle/pedestrian trail put on the side as an afterthought.

SLPNA’s position on this is clear. SLPNA opposes the return of trains south of Sutterville Road, and north of the community of Freeport. SLPNA supports the extension of train traffic to a planned new station at the Sacramento Zoo, just north of Sutterville Road. SLPNA supports the City’s Del Rio Trail Project. We do not want to see the design of a great project in our neighborhood sacrificed in order to supposedly “show that the rail line could potentially be viable again.” CSRMF identifies eight items it wants as “mitigation.” Some of the items appear to actually be construction of operable elements of a railroad track. The items are labeled as “mitigation” in the letter, although it is not clear why mitigation would be necessary if CSRMF’s 100% track retention position were followed. SLPNA’s comments on the eight items are below:

CSRMF Item #1. That the City include a provision that the mitigated negative declaration is not intended to preclude future use of the tracks should one emerge.

SLPNA comment: While SLPNA opposes the return of train traffic, SLPNA has no objection to this statement. Anyone is free in the future to propose any kind of project along the route. The Del Rio Trail Project would not preclude CSRMF, State Parks, or anyone else from proposing a new project that would return trains to the route.

CSRMF Item #2. That the City retain the Sutterville Road crossing and retain the Sacramento Southern Railroad's ability and right to use the current rails on State-owned property south of Sutterville Road.

SLPNA comment: SLPNA has no objection to retaining the Sutterville Road RR crossing in place. We are not aware the City has any control over the "right" of the current excursion train to use rails on the relatively limited area of State-owned property south of Sutterville.

CSRMF Item #3. Rather than burying rail in concrete on cross streets to show only the rail crown, that the City install flangeways on all streets intersecting the trail to signify potentially future use of the track.

SLPNA comment: SLPNA objects to this item because it is requesting that the City build parts of an operable railroad as part of the Del Rio Trail pedestrian/bicycle Project. Again, State Parks recently removed the return of trains to this area from their plans. The baseline conditions at many of the existing street crossings is that the rails are buried under asphalt. This has caused early failure of the asphalt and a clear street maintenance issue for the City.

Further, if flangeways were installed, they would be parallel with bicycle direction of travel, which is dangerous because bike tires can become caught in the flangeways. If flangeways were installed, the Trail crossing of the street could not be in the location of the current tracks buried under asphalt. The Trail crossing would need to be off to the side, which may exacerbate right-of-way (ROW) and grade constraints. If the trail crossing were off to the side anyway, it then makes no sense to then install adjacent flangeways (for a nonexistent train). If, in the unforeseeable future, the return of train traffic is proposed and approved, that would be the appropriate time to design a crossing that would work for trains and go to the expense of building it. CSRMF's request for the Del Rio Trail to install flangeways is an attempt to get the City to begin building an operable railroad as part of a bicycle/pedestrian project. The City should reject it. No mitigation is necessary for tracks that remain buried under the street or currently have only the rail crown exposed because that is the baseline condition.

CSRMF Item #4. Rather than removing rails on the bike trail at street intersections where the trail does not cross the rails perpendicularly, that the City re-align the bike trail to create a perpendicular crossing of the tracks and use flangeways to signify potential future use of the tracks (or avoid crossing the trail altogether so no remedial action is necessary).

SLPNA comment: ROW, grade constraints, and access points require the Trail to cross the remaining tracks at some points along the route. Installing approximately 90-degree turns on either side of the tracks in order to facilitate a perpendicular crossing, and installing flangeways in addition, results in a more expensive construction and a poor design for both bicycle and pedestrian traffic. Again, CSRMF is asking the City to sacrifice design and make the Trail more expensive in order to design around a nonexistent train that was specifically removed from CEQA review by the very agency that operates the train. The City should reject this item. In the unforeseeable event of the return of train traffic, these crossings could be redesigned.

CSRMF Item #5. That the City not allow the use of the space between the rails for a walking path to avoid encouraging the unsafe practice of walking on or near rails.

SLPNA comment: The most recent design moved the pedestrian path into the rails specifically to retain more track. It is our understanding compacted decomposed granite would be placed between the rails and on the sides to facilitate walking. This design was specifically to address concerns in CSRMF's January letter about track preservation, and SLPNA supported it. CSRMF's January letter did not say they wanted the Del Rio Trail to be designed around future train traffic. We do not think pedestrians will have trouble differentiating between preserved tracks converted to a walking path with tracks with active railroad traffic farther north.

It is important to note why the City design separated pedestrian and bicycle paths wherever space allowed. City staff told the project development team 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 in the future, it is the City's intent to separate these uses onto separate trails wherever possible, not just on the Del Rio Trail.

CSRMF Item #6. That the City not "beautify" the space between the rails by planting wildflowers or other vegetation that could hasten degradation of the ties, rails, or ballast.

SLPNA comment: This is similar to item #5 and goes to the heart of the issue. CSRMF wants the Del Rio Trail Project designed around future train traffic. The neighborhood and SLPNA opposes train traffic in the area. Regardless of the opposition to trains, the City should not sacrifice good design and Trail amenities for trains that are not likely to run again. We note that in many places vegetation is already covering the tracks as a result of 40 years of abandonment.

CSRMF Item #7. That the City not oppose voluntary efforts by qualified individuals to maintain and repair the rails.

SLPNA comment: The rails have been abandoned since 1978. Regional Transit (RT) purchased the corridor in the 1980's. In those 40 years, neither CSRMF, nor any other qualified individuals to our knowledge, have volunteered to maintain and repair the rails on the RT-owned section. SLPNA would not oppose maintaining the rails consistent with their

preservation as part of a rail-themed Trail corridor. In fact, SLPNA supports a rail-history theme for the Del Rio Trail. However, indefinite maintenance of the rails in a condition suitable for train traffic that CSRMF acknowledges is in the unforeseeable future serves no good purpose. In many areas, native valley oaks have grown in and around the tracks that the neighborhood has come to appreciate. SLPNA would oppose removal of most of these trees merely for the purpose of maintaining tracks for nonexistent trains. The Del Rio Trail Project is being designed to retain as many trees as possible. The Sacramento Tree Foundation has indicated their desire to begin planting valley oaks and California black walnuts in the ROW. SLPNA would welcome CSRMF's volunteer efforts to maintain the 98.2% of the remaining rails that the current design would preserve, if the rails are preserved as part of a historical display and trees are preserved. SLPNA would not welcome removing the trees and maintaining the rails for trains that are not there.

CSRMF Item #8. That, in exchange for easements or other grants from the State for use of the right-of-way on State property, the City grant an easement in favor of State Parks for future use and reconstruction of the tracks along the Del Trio Trail (subject to all necessary prerequisites for reconstruction or use, including amendments to the Old Sacramento State Parks General Plan or other general or specific plans, and environmental review supporting reconstruction or use of the rails).

SLPNA comment: The City should not grant State Parks an easement for the future use of trains because State Parks specifically removed the return of trains from the 2014 Old Sacramento State Parks General Plan. We are not aware that State Parks has even requested an easement.

CSRMF is asking the City to take on additional construction and maintenance costs in order to design and build the Trail to be compatible with train service that is opposed by the neighborhood, not in the foreseeable future by their own acknowledgement, and was specifically removed from consideration by State Parks, the agency that operates the train. The City has done a substantial redesign of the Project to reach 98.2% track retention and SLPNA supports the effort. We think the City may have done all it feasibly can to address CSRMF's concerns.

Making additional design sacrifices for absent trains may conflict with a project description for a safe and efficient bicycle/pedestrian trail that maximizes connectivity with adjacent neighborhoods.

In closing, SLPNA supports the retention of most of the remaining track, development of the Del Rio Trail with a rail-history theme, and inclusion of CSRMF in the planning of that theme and its amenities. SLPNA does not support the co-opting of the Del Rio Trail into a plan for the return of train traffic. The return of train traffic is opposed in writing by State Senator Dr. Richard Pan and Assemblymember Jim Cooper, who represent the neighborhood.

Cordially,

Board of Directors
South Land Park Neighborhood Association