

The Situation

In February 2015 RPD began installing new signs in our parks. There are two types, one for regular park areas and one for areas managed by the Natural Areas Program. The NAP signs flatly state, "No Bicycles." The NAP signs appear on both paved and earthen trails. The signs for regular park areas make no mention of bicycles. Needless to say, San Franciscans who cycle are extremely unhappy about the signs that now prohibit bike riding on large portions of Twin Peaks, Mount Davidson and McLaren Park.



Letters were sent to RPD and to the Recreation and Park Commission noting cyclists objections and asking for an explanation. A formal response was returned by Phil Ginsberg on March 3. See Appendix A for the full email exchange. To paraphrase the RPD email:

- The signs on the Interior Greenbelt were installed by accident. Cycling is still allowed there.
- Cycling is still allowed on the designated portion of the GGP Oak Woodlands trail.
- In all other parklands, bikes are not allowed on earthen trails.
- Cycling is not allowed on certain NAP controlled lands.
- “The signs posted in McLaren Park are correct and are consistent with long-standing regulations. Many of the trails in McLaren are too narrow, run through sensitive natural habitat and are not constructed to support mountain biking.”
- RPD will continue to partner with cyclists on the McLaren Bike Park project and invites cyclists to work with RPD to explore the possibility of implementing mountain bike trails in some parks.

I would like to address these statements.

Oak Woodlands trail

Many cyclists worked with the NAP on the project to restore the trail. Much of the multi-use portion is composed of very loose sand. We were told by NAP that they were going to add a compound to the sand to consolidate it into firm surface. However, they have declined to follow through on this. The trail is difficult to walk on and almost impossible to ride on. For all practical purposes, it is closed to cycling.

In all other parklands, bikes are not allowed on earthen trails.

What!!! This is a dramatic change in policy. I've been riding on dirt trails in the parks since 1976. My three children learned to ride their bikes on trails in Golden Gate Park. I've spent countless hours with family and friends riding around town and through one park or another. Now, just like that, it's over?

What about the ongoing RPD children's mountain biking program? (It always makes me smile when I meet a group of kids with their instructors on the trails in McLaren.) Why would you buy bikes and hire instructors to take kids on dirt trails if it is against your own regulations?

Multiple people have searched the SF Park Code. There are no rules forbidding cyclists from riding on dirt trails in any of our parks. I would challenge SFRPD to produce these "long-standing regulations" nobody can find. See Appendix B for a list of all bicycle regulations that do appear in the Park Code. Bicycles are only prohibited from park areas if signs are posted to that effect. Legally, cyclists should obey those signs based on Park Code Section 3.02. See Appendix C for a list of the codes cited in the "fine print" at the bottom of the signs.

Cycling is not allowed on certain NAP controlled lands.

Putting aside the issue of dirt trails for a moment, why is cycling on asphalt paths forbidden on NAP lands?

Many of the trails in McLaren are too narrow

I ride all of the trails in the park (excluding the motorcycle hill climbs) and none of them are too narrow. In fact, most riders find narrow trails to be more fun and challenging. On narrow trails cycling speeds are lower, making it easier for cyclists and other trail users to avoid conflict. When we encounter other users, we just pull off to the side and let them pass.

Many of the trails in McLaren are not constructed to support mountain biking.

I have been riding in the park since the early 1980's. Many of the same trails are still in place and look about the same now as they did then. The narrow social trails, some of which have been annexed into the official trail system, have been handling bike traffic for decades without problems. Some of the newer trails built under the Urban Trails program have problem areas, but not exclusively due to bicycle traffic. In any case, trail wear issues could be easily be addressed by allowing cyclists to play a stewardship role in the park.

Many of the trails in McLaren run through sensitive natural habitat

I would not argue that some trails run through sensitive natural habitat. Why is it ok to walk on those trails, but not to ride a bike?

Summary of Current Regulations

Based on the RPD signage and the Park Code, but ignoring unfounded assertions, cycling is permitted on paved and earthen trails in all of our parks unless signs are posted prohibiting it. Due to the NAP signage, bicycles may not be ridden on earthen or paved trails in signed NAP lands, and in fact, not even carried into these areas.

There are a lot of things wrong with NAP's decision to post these new signs to prevent people from riding bicycles in large portions of our parks. These are enumerated below.

Lack of Advance Notice and Community Input

This cycling ban was implemented with no public notice, no outreach by RPD, no public discussion. The signs were just suddenly there. How can a decision that affects so many park users be made behind closed doors?

RPD Commitments and Representations

Over the past 5 years, NAP invited cyclists to volunteer thousands of hours to build trails in Golden Gate Park Oak Woodlands, Interior Greenbelt and McLaren Park. All of this was with the understanding the trails being built were multi-use. Now it's clear the Natural Areas Program used cyclists to get its trail work done and is now prohibiting those same people from using the trails. There are a lot of colorful adjectives to describe this. Let's just say it's wrong.

On September 25, 2012 SF Urban Riders met with Phil Ginsberg, Denny Kern, Eric Anderson, Jim Wheeler, Dana Ketcham and Alex Randolph to discuss off-road cycling in the parks. We were asked to help steer cyclists away from Golden Gate Park and toward McLaren Park where trail conditions are sustainable and bicycles would be welcome. How does the policy change so drastically with no public process?

The will of the people

In 2004 RPD surveyed the public and compiled the 2004 Recreation Assessment Report. The greatest need identified by the public was for increased "walking and biking trails". The surveyors did not ask about walking and biking separately so we cannot tell what percentage specifically wanted bike trails.

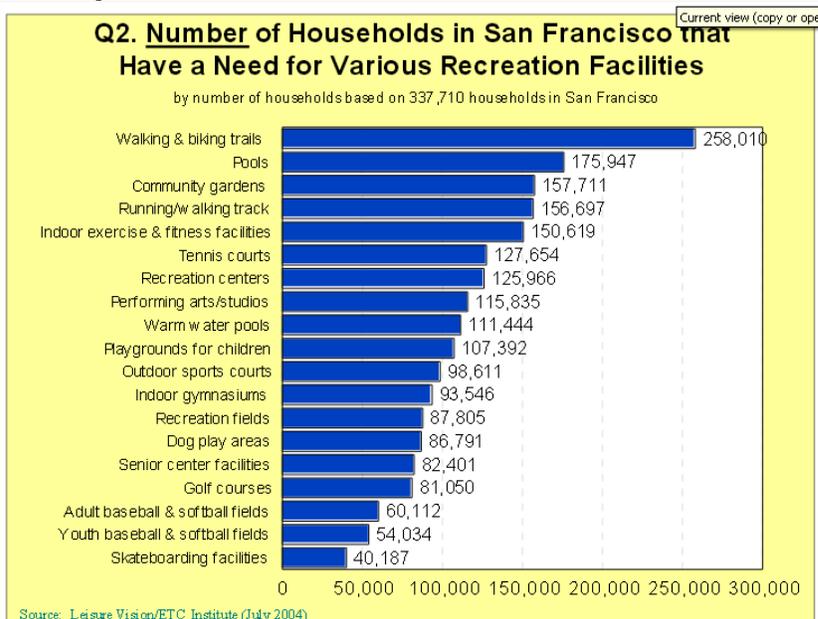
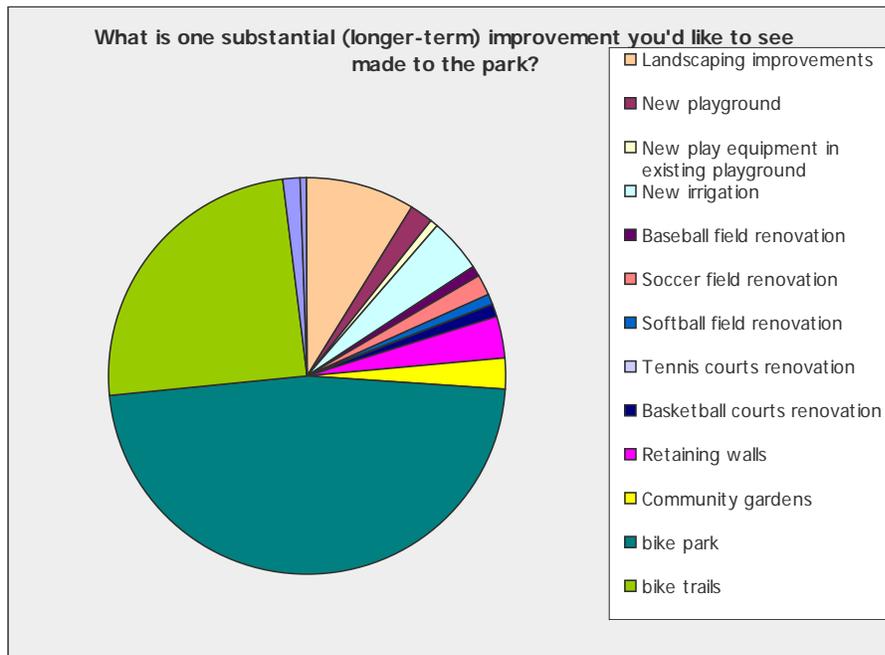


Figure 5 – Rating of Need for Recreation Facilities

In 2010 SFRPD ran a needs assessment for McLaren Park. This involved a series of three meetings and two online surveys. The bike park and bicycle trails were the two most desired improvements to the park. Below is the raw statistical data presented as a pie chart.



Why is SFPRD doing exactly the opposite of what people asked for?

Cycling as Transportation

The impact of this NAP bicycle ban goes beyond preventing kids from biking in our parks. It also prevents people from cycling to our parks. What are you supposed to do with your bike after you ride to the perimeter of the park? Even if there were bike racks, you would lose your bike, or major portions of it, after leaving it on the edge of the park a few times. Before the ban, you would've just ridden in, found a nice spot and had your picnic with your bike nearby.

The ban also represents a denial of transportation cycling routes. Trails through NAP land are also practical bicycle transportation routes. For example, there is a fire road that runs above the golf course fence in McLaren Park. It goes all the way across the park east/west from Persia to Visitacion Avenue at Visitacion Valley Middle School. This is the nicest and safest bicycle route between the Excelsior and Visitacion Valley. The "No Bicycles" signs welcome you at either end.

This measure deals a significant blow to our city's Transit First policies like Green Connections and runs counter to the philosophies put forth in the ROSE.

SNRAMP EIR

The entire plan for the NAP is currently under environmental review. Normally, projects do not proceed until the EIR is finalized and impacts are satisfactorily addressed. The NAP has been given leeway to operate in a maintenance mode pending completion of the EIR process. This action to bar cyclists from areas controlled by NAP goes far beyond maintenance. It is a new aggressive step to restrict public access to our parks. How can this be allowed?

Further, the intent of NAP to prevent people from riding bicycles on trails in natural areas was never discussed in the SNRAMP. See Appendix D for a review of all mentions of bicycles in the SNRAMP. This policy clearly reduces neighborhood connectivity, reduces access to recreation that promotes public health and discourages the use of bicycles for transportation. These impacts are just the sort the EIR process should be weighing.

If NAP intended this policy, it should have been explicitly stated in the SNRAMP and it should have been evaluated in the EIR process. The EIR needs to be redrafted to include this.

Why?

RPD has not articulated why bicycles need to be excluded from NAP lands. How is the impact of a cyclist passing by on a trail any different from that of a pedestrian? If both stay on the trail, how is the adjacent natural area affected? The idea that bikes are inherently destructive is decades old dogma put forward by one entrenched user group that does not want to share our natural areas.

Just like pedestrians, irresponsible and uninformed cyclists can damage trails and the surrounding terrain by short cutting corners and switchbacks, using trails that are unsustainable, or bushwhacking across terrain with no trails. The best way to deal with these people is to bring them into the fold, not to create unreasonable rules that fuel an outlaw culture.

Conclusion

The NAP signage is ill conceived, unwarranted and oversteps the EIR process. The “No Bicycles” text should be removed from the signs. The statement that bikes are not allowed on earthen trails should be retracted. It is not backed up by regulations.

Trail cycling is a growing form of healthy recreation, enjoyed by people from all walks of life. As suggested by Phil Ginsberg, cyclists should work together with RPD to ensure the trail systems in our parks are sustainable and welcoming to all user groups. This might lead to a mix of multiuse, pedestrian and bike specific trails. Cyclists have already demonstrated they are a responsible user group, eager to steward the resources of our parks. I hope you will allow them to continue this.

If SFRPD still wishes to carry on with these new anti-cycling policies, it should be done through a transparent public process that insures the policies align with what San Franciscans actually want.

Respectfully,



Tom Borden
415-252-5902
bikefancier@gmail.com

Appendix A email exchange with RPD

> **On 3/3/15 12:49 PM, "Tom Borden" <tom@intrinsicdevices.com> wrote:**

>

>> SFRPD has recently installed signs banning bicycles from areas of our
>> parks managed by the Natural Areas Program. I take issue with this and
>> would like to second the recent email from Dan Schneider of SF Urban
>> Riders requesting that a discussion of this be added to the agenda for
>> the next Recreation and Park Commission meeting. Please see the
>> attached document that lays out the issues surrounding the ban.

>>

>> To get the ball rolling, concerned cyclists will be attending the Park,
>> Recreation and Open Space Advisory Committee meeting tonight.

>>

>> Thank you,

>>

>> Tom Borden

On 3/3/2015 2:41 PM, Ginsburg, Phil (REC) wrote:

> Dear Tom,

>

> I spoke with Dan Schneider earlier today, but am also reaching out to you
> and others copied on your email.

>

> We recognize your concerns and take all public input about our parks quite
> seriously. The Recreation and Park Department manages over 4,000 acres of
> land and over 30 miles of urban trails. Our goal is to provide
> opportunities for safe, fun spaces that welcome all types of uses
> including mountain biking. Currently mountain biking is allowed on
> earthen trails in the Interior Greenbelt and in portions of the Oak
> Woodlands in Golden Gate Park. In all other parklands, bikes are not
> allowed on earthen trails.

>

> Recently, newly designed parks signs went up in a variety of park
> locations and admittedly have created some confusion. Incorrect signs were
> posted in the Interior Greenbelt; mountain biking is permitted on the
> Interior Greenbelt trails. We are in the process of fixing those and
> expect to have that work completed in the next two weeks.

>

> The signs posted in McLaren Park are correct and are consistent with
> long-standing regulations. Many of the trails in McLaren are too narrow,
> run through sensitive natural habitat and are not constructed to support
> mountain biking. However, as we have discussed, the department is working
> to expand opportunities for mountain biking in McLaren. First, as you
> know, we are partnering with the San Francisco Urban Riders to build a
> bike park in McLaren. Second, the Department would like to work with
> SFUR and other interested mountain bikers by engaging in a park-wide
> circulation study that will help us identify opportunities and constraints

> for expanding mountain biking trails in McLaren and, perhaps, elsewhere.
>
> We recognize that mountain biking is a healthy recreational opportunity
> and pledge to continue to work with SFUR to expand opportunities for
> mountain biking throughout the city.
>
> Best,
>
> Philip A. Ginsburg
> General Manager
> San Francisco Recreation and Park Department

On 3/3/15 3:18 PM, "Tom Borden" <tom@intrinsicdevices.com> wrote:
Phil,

Thanks for the reply. Clearly there are areas of disagreement, but I am sure cyclists are eager to work with SFRPD to legitimize offroad cycling in our parks. I can also say with some certainty that cyclists would welcome the responsibility to serve as stewards of the trails we ride. If you want to see some really nice trails in the parks, let us maintain them for you.

Best Regards,

Tom

Tom Borden

Appendix B City and County of San Francisco Municipal Code - Park Code related to bicycles

Below are all of the regulations in the Park Code that deal with bicycles. Points to note are:

There is no rule against riding bicycles in our parks, whether it be on paved or unpaved trails.

Section 2.07 acknowledges bicycles are distinctly different from powered vehicles and so the rest of the Code does not apply vehicle restrictions to bicycles.

Section 3.04 shows that bicycles are expected to be found on the unpaved bridle paths.

SEC. 2.07. "VEHICLE" DEFINED.

When used in this Code, the word "vehicle" shall mean any device, in, upon, or by which a person or property is or may be propelled, moved or drawn upon a highway, **excepting a device moved by human power** or used exclusively upon stationary rails or tracks, and shall include, but not be limited to, the following: automobile, truck, motorcycle, motor-driven cycle, animal-drawn carriage, buckboard, cart, and minibike or bicycle when operated under engine power. (Added by Ord. 603-81, App. 12/18/81)

SEC. 3.04. BRIDLE PATHS.

The bridle paths are maintained for the primary use of horses and riders and any person who walks, jogs, runs or otherwise makes use of a bridle path, or who propels or conveys a vehicle or a **bicycle**, cart, wagon or other object on a bridle path, or who allows any animal within his or her custody on a bridle path, must leave the bridle path or remove the vehicle, object or animal from the path whenever such action or removal is necessary in order to give way to horses and riders. This Section is not applicable to members of the Police Department in the performance of their duties. (Added by Ord. 603-81, App. 12/18/81)

Sec. 3.05. San Francisco - Park Code 16

Conservatory Valley, no person shall participate in any athletic activity, including, but not limited to running, jogging, volleyball, baseball, soccer, football, roller skating, **bicycle riding**, skateboarding, or frisbee. The prohibition contained in this Section applies to running or jogging only when the person running or jogging does not remain on pedestrian paths. (Added by Ord. 603-81, App. 12/18/81)

Appendix C Codes cited in the “fine print” at the bottom of the signs

Park Code

3.21. Voting on Own Character or Conduct. (conflict of interest issues. Why is it here?)

3.12. CAMPING PROHIBITED

3.02. SIGNS TO BE OBEYED

No person shall willfully disobey the notices, prohibitions or directions on any sign posted by the Recreation and Park Commission or the Recreation and Park Department

4.01. DISORDERLY CONDUCT

4.04. LITTERING AND DUMPING OF WASTE MATTER PROHIBITED

Health Code

SEC. 40. DOG TO BE CONTROLLED SO AS NOT TO COMMIT NUISANCES

SEC. 41.12. DUTIES OF OWNERS (of animals)

Appendix D SNRAMP Final Draft - What it says about cycling on trails

The SNRAMP does not explicitly define a policy on bicycle trail riding. Clearly the writers have an anti-cycling agenda. However, the document does not state any intent to exclude bicycles on a wholesale basis. Restricting trail cycling is discussed only for specific areas. The basis for restricting cycling in those specific areas is unsubstantiated. There is nothing in the document that suggests there are existing regulations that prohibit cycling on earthen trails in Natural Areas or our parks in general.

Below are all of the references to bicycles contained in the SNRAMP. My comments are highlighted by underline.

3.4 RECREATION AND PUBLIC USE 3. Setting

Natural Areas are used extensively by residents and visitors of San Francisco for passive recreation. The types of passive recreational activities that occur in Natural Areas include walking, hiking, running, nature watching, dog walking, and other passive recreational activities.³

³ Non-passive recreational activities are those that require substantial development of sites and facilities such as playing fields, stables for horseback riding, rest rooms, indoor recreational centers, and playgrounds. For active recreation, the facility is more important than the natural setting. In general, active recreational uses are not supported by the Natural Areas.

Note Given the definition in the footnote, bicycle trail riding is a “passive recreational activity” which occurs in Natural Areas alongside walking, hiking...

Trails and trail-related experiences, such as nature observation, were identified as one of the most important facility needs by residents in San Francisco.

Note Walking and biking trails were identified as **the** most important recreation facilities by the survey. The survey provides no insight into whether people want trails for the purpose of “nature observation”.

In 2004, SFRPD developed a Recreation Assessment in order to evaluate community program and facility needs. As part of this assessment, a statistically significant number of households (1,035) were surveyed.⁴ Of the population surveyed, 24 percent stated they would participate in programs or activities that provided opportunities for visiting Natural Areas if more programming was available. This was the second highest percent of any of 26 activities identified in the survey, following only running and walking (28 percent)—activities supported by trail development in natural areas. Bicycling (12 percent) was the 8th activity on the list, while dog walking (8 percent) was 11th.

Note The survey question referred to above asks what, “Programs and Activities Respondent Households Would Participate in More Often if More Programming Was Available”. Cycling and dog walking score low on this list compared to “Visiting nature areas” or “adult fitness classes” because people do not feel they need “programming” in order to enjoy them. Further the survey choice was not about visiting “Natural Areas”, it was about “visiting nature areas”. The response does not indicate support for how the NAP wants us to use our parks.

Most striking was the overwhelming importance of walking and **biking** trails to residents, with 55 percent stating trails were one of the four most important recreational facilities (and 25 percent stated as the most important) for their household. Currently 61 percent of respondents visit Natural Areas for some form of recreation. Because trails are the fundamental infrastructure for recreation in Natural Areas, this Final Draft makes recommendations on how to improve the existing trail network.

6.1 LAKE MERCED

It is the largest freshwater lake in the City and supports numerous recreational activities, including boating, fishing, golfing, jogging, **bicycling**, skeet shooting, picnicking, and appreciation of the natural environment.

6.6.1 Lakeview/Ashton Mini Park

The trails in the southeast corner of the park and along the southern boundary are eroding because of intense foot and **bicycle** traffic.

6.8-9 Twin Peaks

Issue TP-3: Because Twin Peaks receives such a large volume of public use, the trail system is of particular importance in protecting not only sensitive habitats, but the people that use the Natural Area. A total of 8,741 feet of trails exists within the Natural Area. Existing fences in some areas guide users to established paths. These paths are designed for foot traffic only, but receive some **motorcycle and mountain bike** use. Social trails, subject to closure, are very common and cover 2,303 feet. Pedestrian routes along Twin Peaks Boulevard are not marked and are inherently unsafe as pedestrians share the roads with cars.

Recommendation TP-3b: Signs should be installed at all formal access points indicating that trails are for foot use only. Following installation, SFRPD shall closely monitor the use of trails within the area. If it becomes clear that **motorized and bicycle** access continues and is damaging sensitive habitat areas, then the appropriate fencing shall be installed to prevent **wheeled-vehicle** access to sensitive habitats (MA-1a and MA-2a).

6.15 Golden Gate Park, Oak Woodlands: Of particular concern at the Oak Woodlands is the unauthorized use of trails by **mountain bikes**. The placement of signs and temporary barriers as discussed in GR-11 should address this concern.

MA-2j Limit **mountain bike** use with signs and, if necessary, temporary barrier fences

6.19 McLaren Park: Issue MP-7: The occasional use of the Natural Area by people riding off-road **motorcycles and mountain bikes** continues to occur. This activity damages sensitive habitats and species. While such use may be infrequent, the damage caused by a single trip could significantly impact plants and animals on the brink of survival at McLaren Park.

Note In the sections above I have highlighted the recurring association of motorcycles and bicycles as if their impacts were comparable. A 230 pound 30 horsepower motorcycle with a foot of suspension travel and huge knobby tires is nothing like a 23 pound bicycle powered by a 1/4 horsepower rider. The NAP does not distinguish between the two and routinely blames motorcycle created damage on and off trails on bicyclists.

Also, please note the Park Code specifically distinguishes between bicycles and powered vehicles. For the purposes of the Park Code, bicycles are not “vehicles”. The SNRAMP tries to undo this by lumping bicycles and motorcycles together as “wheeled-vehicles”.

6.6 Brooks Park and Lakeview/Ashton Mini Park: Approximately 650 feet of earthen trails lead around and across the outcrop in the center of Lakeview/Ashton Mini Park. The trails in this Natural Area are classified as either primary or secondary; no trails within this area are subject to closure. Generally, the trails are in good condition because they are on bedrock. The trails in the southeast corner of the park and along the southern boundary are eroding because of intense foot and **bicycle** traffic.