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August 4, 2024

*By electronic mail only*

East Bay Regional Park District  
Board of Directors  
2950 Peralta Oaks Court  
P.O. Box 5381  
Oakland, CA 94605-0381

**RE: Public Comment on Agenda Item VIII.B.1. – Authorization to Issue a Notice of Preparation of an Environmental Impact Report for the Wildcat Bike Trail Project: Wildcat Canyon Regional Park**

Dear President and Directors:

Thank you for the opportunity to comment on the proposal to proceed with the preparation of an Environmental Impact Report (EIR) for the Wildcat Bike Trail Project in Wildcat Canyon Regional Park. I am submitting these comments on behalf of my client, Sustainability, Park, Recycling, and Wildlife Legal Defense Fund, Inc. (SPRAWLDEF), as a supplement to its other public comments on this matter.

While SPRAWLDEF generally supports the principle of conducting an adequate environmental review for new recreational use and facilities, it is also very concerned that (1) the Wildcat Bike Trail Project appears to be moving forward without a land use plan amendment to address its inconsistency with the Wildcat Canyon Regional Park Land Use Plan, and (2) without a meaningful examination of alternative locations. We are also concerned that (3) the staff report fails to disclose the full Conceptual Design that Pointe Strategies prepared for the Park District in April 2024 prior to any environmental review, and (4) the agenda item was released to certain advocacy groups weeks before it was announced to the general public.

***1. The proposed Wildcat Bike Trail is a new, intensive recreational use that requires a land use plan amendment.***

As you may recall, my law firm's previous letter concerning the Wildcat Canyon Bike Trail documented my client's concern that the proposed flow trail will introduce an entirely new type of intensive recreational bicycle use in the heart of an area long-valued and designated for natural resource protection. That letter further explained that the current Land Use Plan for Wildcat Canyon Regional Park does not contemplate this type of recreational facility and urged

the Park District to undertake a Land Use Plan Amendment to facilitate a full examination of impacts and alternatives in relation to the Park's other policies and land uses before, as consistent with the Park District Master Plan. That letter is incorporated in its entirety and attached here as **Appendix A: Greenfire Law Comment (April 24, 2023)**. I am also attaching a copy of a previous comment letter from SPRAWLDEF, Golden Gate Bird Alliance, and Sierra Club, also incorporated by reference as **Appendix B: Joint Comment Letter (June 21, 2023)**.

In addition, for your convenience, I have also attached a copy of the Wildcat Canyon Regional Park Land Use–Development Plan as **Appendix E: Wildcat LUDP**, and a copy of the most recent Wildcat Canyon Regional Park Land Use Plan Amendment as **Appendix F: 2011 Wildcat LUPA**.

**2. *The proposed EIR documents fail to include an adequate Project Description and range of alternatives.***

The EIR working documents that are posted to the Park District's Wildcat Bike Trail website have some important deficiencies that should be addressed early in the planning process. First, the project description is inadequate because it fails to acknowledge that the new trail intends to pioneer a new recreational use and misses the opportunity to frame the project as incorporating a Land Use Plan Amendment. If the Park District is going to invest in an EIR, why not take the opportunity to bring the Wildcat Canyon Land Use Development Plan (LUDP) into the 21st century. The existing LUDP plan has not been amended since 2011 and the demand for new and more intensive types of bike trails has not been adequately examined in the context of other park uses and priorities. As noted in the District's Master Plan, the need to balance recreational uses with resource conservation and habitat protection requires careful planning. Accordingly, we urge you to reframe the project to incorporate a Land Use Plan Amendment.

The working documents also fail to identify any alternative locations for the proposed flow trail. Without the identification of viable alternatives, the proposed EIR appears to be an exercise in pretextual review of decision that has already been made. The identification of alternatives should take place early in the process to provide for the potential that the present site is unsuitable due to endangered species habitat and other issues. For example, the current alignment appears to be located in prime Alameda whipsnake habitat, yet there has been no consideration of developing a trail in another location that is already more suitable for intensive recreation. Establishing alternatives now could prevent major setbacks later if the chosen alignment proves inconsistent with the Park District's mission to conserve natural resources while also providing for outdoor recreation.

**3. *Procedural fairness and full disclosure provides for accountability and trust.***

Finally, we are concerned that the proposal does not disclose the full scope of the proposed Bike Trail facility. The Wildcat Bike Trail Conceptual Design, prepared for the Park District by Pointe Strategies in 2024, shows that the Flow Trail is not just a trail used by bikes instead of hikers, but a major facility that will transform the open hillsides of Wildcat Canyon into a competitive-class mountain biking training facility. See **Appendix C: Conceptual Design**. The public should be fully informed of the vision being promoted among mountain biking advocates and enthusiasts. Such a facility is also likely to attract biking enthusiasts from across the region, which will increase the need for adequate parking and additional restrooms, and may

increase conflicts with other park users, potentially eliminating equestrian use.

Finally, we are also concerned that plans for this agenda item to be heard at the August 5th Board Meeting were released on a mountain biking advocacy website on July 7, 2025, more than two weeks before it was announced to the general public. See **Appendix D: Flow Trail Blog post**. This raises the concern that the public process is not fair and impartial. We urge you to investigate this and take action to ensure that future public notice and comment opportunities are not so biased.

In closing, thank you for your consideration. SPRAWLDEF looks forward to working with you to protect our parks and natural resources for future generations.

Sincerely,



Susann M. Bradford  
Greenfire Law, PC

Enclosures

## **Appendix A**



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April 24, 2023

*By electronic delivery*

Board of Directors  
East Bay Regional Park District (EBRPD)  
2950 Peralta Oaks Court  
P.O. Box 5381  
Oakland, CA 94605-0381  
[PubAffs@ebparks.org](mailto:PubAffs@ebparks.org)

**RE: Public Comment regarding the Proposed Wildcat Canyon Flow Trail**

Dear EBRPD Board Members and staff,

I am writing on behalf of Sustainability, Park, Recycling, and Wildlife Legal Defense Fund, Inc.<sup>1</sup> (“SPRAWLDEF”) concerning the proposed project to construct a “Flow Trail” in Wildcat Canyon Regional Park. The purpose of this letter is to respectfully request that the Board approaches this significant new use of park lands and through a Land Use Plan Amendment (LUPA) process and prepare and Environmental Impact Report (EIR) to ensure careful consideration of potentially significant environmental impacts and to evaluate potential alternatives to the present proposal before committing to a specific location and design.

SPRAWLDEF is particularly concerned that the heart of Wildcat Canyon Regional Park is not a suitable location for this type of activity. Flow trails are distinct from other types of trails and pose unique challenges for resource protection and public safety. Without a careful examination of potential impacts and alternatives, this choice of location could inadvertently create more problems than it solves by inviting conflicts between users and causing impacts that could be identified and avoided with a more circumspect analysis. This is not a minor alteration of park trails, but a significant new activity that requires proper planning.

**Flow Trails warrant a Land Use Plan Amendment and an EIR.**

Flow trails were never examined within EBRPD’s Wildcat Canyon Regional Park Land Use Plan (LUP). In addition, bicycle use in general is mentioned only sparingly in the LUP as

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<sup>1</sup> As the Park District is aware, SPRAWLDEF was a key litigant in the effort to save Point Molate as a Regional Park. Along with Citizens for East Shore Parks, it was instrumental in blocking the proposed commercial development of the site.

one of many uses to be accommodated by multi-use trails.<sup>2</sup> The plan does mention in passing that certain areas within nearby Tilden Park are too steep for bicycle access, but provides no detailed analysis.<sup>3</sup> There is no analysis of any type of single-use bicycle trails or any impacts from mountain biking or any other type of bicycling. Now, decades later, mountain biking has increased the popularity of trail riding dramatically, but the impacts and implications for other management objectives still have not been properly evaluated. This is long past due. In addition, the proposed, Wildcat project would introduce an entirely new type of mountain bike trail that has never been evaluated for its potential to result in significant environmental impacts.

Authorizing new uses or recreational units in a piecemeal fashion would undermine the purpose of planning to ensure that new activities are aligned with the full range of Park objectives and will not impair other uses, natural resources, or public safety.

Flow trails have unique characteristics that are different than traditional multi-user and single-use hiking trails. They are specifically designed for mountain bikers to use momentum-gaining techniques like “pumping” to gain velocity as they navigate technical features like berms and jumps. This allows for high-speed trail riding that can be dangerous to wildlife and other trail users. These are also one-way trails, so unless the trail is designed as a loop, riders must use a different route to return to the top of the trail, which increases bike traffic on nearby trails thereby increasing the impacted area and the potential for conflicts with other trail users. Preventing adverse impacts requires thoughtful design and placement to ensure that vulnerable wildlife and other park users will not be harmed. When flow trails are located near sensitive habitat or hiking trails, the potential for conflicts increases. Once a new flow trail is opened, it may also attract increased use as a result of popular online mountain biking apps and websites that feature trail directories and ratings.<sup>4</sup>

It must not be overlooked that unauthorized use of hiking trails by mountain bikes is already a well-documented and growing problem throughout EBRPD Regional Parks, including within Wildcat Canyon Regional Park and nearby Tilden Regional Park.<sup>5</sup> (See **Exhibit A**) There are few places, if any, where East Bay hikers and walkers can now go to observe and enjoy nature without encountering mountain bikes. Bicycle use has become common on narrow trails designated for hiking only as well as multi-use trails. This is not just a nuisance; for elders and people with small children, as well as people with leashed pets, this can pose a significant safety hazard. In addition, while it is typically the hikers who are expected to step aside so that bicycles can pass, some bikers have caused trail widening and side cuts in the effort to bypass hikers.<sup>6</sup> Multiple use trails and fire roads that allow bikes are also not without hazards caused by high-speed trail riding, which has been tracked and documented by some mountain biking apps that

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<sup>2</sup> Wildcat Canyon Regional Park, Final Land Use-Development Plan and Environmental Impact Report (Sept. 10, 1985).

<sup>3</sup> *Id.* at 31.

<sup>4</sup> See e.g., Trailforks, “The Best Mountain Biking Trails in California,” <https://www.trailforks.com/region/california/trails/>; Singletracks, “Find Mountain Bike Trails Near You,” <https://www.singletracks.com/mountain-bike-trails/>; MTB Project Trail Directory, <https://www.mtbproject.com/directory/areas>.

<sup>5</sup> See generally, Exhibit A: (Presentation) Public planning, process, and park management problems associated with a mountain biking biking-only downhill trail in Havey Canyon -Wildcat Canyon Regional Park (SPRAWLDEF, April 21, 2023).

<sup>6</sup> See e.g., Exhibit A at p. 7, showing examples of bicycle damage and widening of hiking-only trails.

allow users to share and compare their top speeds on specific trails.<sup>7</sup> These wider trails are also affected by trail widening and unauthorized violations of closures.<sup>8</sup> To date, the EBRPD has generally failed to enforce trail restrictions and developed no clear strategy to protect hikers and trails from being impacted by unauthorized bike use. The fact that the proposed trail corridor appears to cut across the existing Mezue Trail is also very concerning, as this will likely increase user conflicts and risk. Rider safety is also an issue, with many riders of diverse skill levels sharing an unregulated, high-speed downhill technical trail. These safety hazards raise potential liability issues that may require an amendment to Ordinance 38 to address flow trail safety.

Notably, many communities are opting to develop special areas for bike-only trails and “bike parks” in order to distance intensive biking activity from other types of trails and reduce the potential for conflicts between users – and to reduce the risk of injuries and costs of enforcement. For example, Marin County Parks has developed a bike park that features multiple flow trails to accommodate different skill-levels, including special trails for kids.<sup>9</sup> Similarly, Truckee and other communities have also introduced bike parks to accommodate the growing interest in technical mountain biking and flow trails.<sup>10</sup> One clear advantage of this is discouraging hikers and bikers from easily encroaching onto one another’s trails, which reduces risk of injury and the need for enforcement, a complicated issue that has no easy answer. Much as “skate-parks” did for skateboarders, creating dedicated spaces where mountain bikers can hone their skills without adversely impacting other activities could go a long way to reduce trail user conflicts.

In addition, the potentially significant environmental impacts of new and unauthorized mountain biking trails must be carefully examined. The proliferation of unauthorized mountain biking trails is another serious problem in many Bay Area parks and open space areas throughout the Bay Area. This issue has been documented in the case of Briones Hills Regional Park, where a survey revealed an extensive and growing network of unauthorized “bootleg trails.”<sup>11</sup> Indeed, as of June 2022, EBRPD staff had documented 31 miles of unauthorized bike trails in Briones Hills Park alone. Similar issues exist in many other Parks that have not yet been properly surveyed, including Wildcat Canyon Regional Park. There are already several unauthorized new biking trails within Wildcat and nearby Tilden Regional Park, as well as other trail damage and trail widening.<sup>12</sup> (See **Exhibit A**) Additional data is needed to assess the full scope of the problem, both here and across EBRPD lands. Poorly designed trails can increase soil erosion causing adverse impacts on water quality, while increased trail density can lead to a variety of adverse impacts on plants and wildlife. Bringing more mountain bikers into an area could easily exacerbate this problem. The existing need for trail maintenance and repair, and closure of unauthorized trails, is already substantial and needs to be examined on a Park-wide basis to

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<sup>7</sup> See Exhibit A at p. 6; for more information *see also*: Strava, “Maps: What’s New,” <https://www.strava.com/whats-new?f=maps>; (last visited April 19, 2023).

<sup>8</sup> See Exhibit A at p. 9, showing fresh tire tracks on trail that was closed due to wet conditions.

<sup>9</sup> Marin County, Stafford Lake Bike Park, <https://www.parks.marincounty.org/parkspreserves/parks/stafford-lake-bike-park> (last visited April 12, 2023).

<sup>10</sup> See e.g., Truckee Bike Park, <https://www.truckeebikepark.org/trails> (last visited April 12, 2023).

<sup>11</sup> Park Advisory Committee Mtg. Staff Report, June 27, 2022; link to presentation: <https://ebparks.primegov.com/Portal/Meeting?meetingTemplateId=2874>.

<sup>12</sup> See Exhibit A, at pp. 5, 8-10.

properly allocate resources. Simply building a new flow trail will not address these broader problems.

With respect to soil erosion and water quality, scientific studies have found that mountain biking causes significantly more soil damage and trail incision than hiking, due to the faster velocity and “cutting” action of bike tires, as well as slipping and skidding on inclined trails.<sup>13</sup> Trail degradation is often worse on steeper slopes. For example, a 2006 study found that trail slope had a significant effect on the degree of trail incision and soil loss caused by mountain biking.<sup>14</sup> Trail widening was also more pronounced on steeper slopes. More generally, the International Mountain Bicycling Association (IMBA) has recommended that: (a) trail grades should never exceed 15%, and (b) the maximum sustainable grade should be 5% for sandy/fragile soils, and 10% for loamy soils or soils with mixed textures.<sup>15</sup> In addition, the propensity for landslides in Wildcat Canyon could exacerbate these issues and therefore requires further site specific analysis.

Mountain biking also impacts biological resources. Unauthorized trails and bootlegs can disturb vegetation, fragment habitat, and increase trail density. Impacts to vegetation include trampling of plants and creating soil disturbances that allow invasive plants to take root.<sup>16</sup> A proliferation of side trails and bootleg trails can also fragment existing plant communities into smaller islands divided by invasive weed corridors. Invasive species, once established, often outcompete native species and undermine ecological integrity and biodiversity. This also impacts the pollinators and other insects that rely on native plant communities. Habitat fragmentation also impacts wildlife by creating new obstacles to animal movement that can impact migration corridors, foraging, and reproduction. Expanding human activity and noise into new areas can also deter wildlife from using an area. In addition, some species, like snakes, may use trails for movement or basking, placing them at risk for being run over or injured by fast moving bikes.<sup>17</sup>

Notably, the preliminary Biological Resource Assessment for the proposed Wildcat Canyon Flow Trail (Wildcat BRA) provides no detailed analysis of potentially significant

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<sup>13</sup> See e.g., Davies, C., and D. Newsome, 2009. *Mountain bike activity in natural areas: impacts, assessment and implications for management—a case study from John Forrest National Park, Western Australia* (2009); White, D.D., M.T. Waskey, et al., A Comparative Study of Impacts to Mountain Bike Trails in Five Common Ecological Regions of the Southwestern U.S. *Journal of Park and Recreation Administration* (2006) 24(2):21-41; Evju, M., D. Hagen, et al., Effects of mountain biking versus hiking on trails under different environmental conditions. *Journal of Environmental Management* (2021) 278(2):111554.

<sup>14</sup> White, D.D., M.T. Waskey, et al., A Comparative Study of Impacts to Mountain Bike Trails in Five Common Ecological Regions of the Southwestern U.S. *Journal of Park and Recreation Administration* (2006) 24(2):21-41.

<sup>15</sup> International Mountain Bike Association, *Managing Mountain Biking: IMBA's Guide to Providing Great Riding*. The International Mountain Bike Association, Boulder, CO. (Webber P., ed., 2007).

<sup>16</sup> See e.g., Esby, E.M.S., *Edge effects: Native and non-native plant distribution along single use and multi-use trails in the Santa Monica Mountains National Recreation Area, California*. Montana State University: Bozeman, MT (2011). See also Harper, K.A., S.E. Macdonald, and P.J. Burton PJ, Edge influences on forest structure and composition in fragmented landscapes. *Conservation Biology* (2005) 19(3):768-782; California Department of Food and Agriculture, California Invasive Weed Awareness Coalition, *California Noxious & Invasive Weed Action Plan* (2005).

<sup>17</sup> See e.g., Miller, A. and J.A. Alvarez, Habitat Use and Management Considerations for the Threatened Alameda Whipsnake (*Masticophis lateralis euryxanthus*) in Central California. *Western Wildlife* (2016) 3:29–32. See also Rochester, C.J., S.A. Hathaway, et al., *Herpetofaunal monitoring in MSCP region of San Diego*. U.S. Geological Survey (2001).

impacts from trail construction or from the probable development of bootleg trails along the perimeter and in between the new trail and adjacent trails. In fact, the project description consists of three short sentences:

This project will involve the installation of a newly created directional flow bike trail in the northwest section of Wildcat Canyon Regional Park approximately 1.86 miles (3 kilometers) southeast of the Alvarado Staging Area. Low impact grading will occur along the proposed directional flow bike trail corridor. No trees or shrubs will be removed.<sup>18</sup>

The impacts of mechanical trail construction and grading work that is necessary to create a momentum-resistant trail bed and technical flow trail features are not addressed. The characterization of the grading as “low-impact” is thus presumptive and potentially misleading, particularly when the grading will occur on a previously undeveloped section of hillside within a natural area.

Accordingly, the existing impacts from mountain biking – and potential new impacts from the construction of high-speed flow trails – are potentially significant and the appropriate placement of such trails requires careful analysis to minimize use conflicts and damage to natural resources. While the Wildcat BRA states that the site was chosen to “create a more predictable and safer environment for all trail users” and to minimize biological or botanical impacts, the basis for this selection is not fully explained or justified.<sup>19</sup> In particular, there is no comparison data to indicate that any other locations were evaluated or what factors were considered. Accordingly, this site selection is premature until the larger land use implications and potential conflicts and impacts associated with intensive mountain biking have been adequately examined on a Park-wide or system-wide basis.<sup>20</sup> Planning that encompasses all Parks is the best way to provide locations for mountain biking that will protect natural resources and prevent conflicts with hikers and equestrians – rather than this piecemeal approach that fails to evaluate alternatives.

Furthermore, in light of the many potentially significant environmental impacts of intensive mountain biking, including flow trails, the preparation of an EIR will be necessary to adequately consider these impacts in accordance with the California Environmental Quality Act (CEQA).<sup>21</sup> As courts have noted, the primary purpose of CEQA is to enable decisionmakers and the public to identify the potential environmental consequences of their decisions *before* they are made.<sup>22</sup> In keeping with this principle, the environmental impacts of an entirely new type of trail and related mountain biking activity should be properly examined before a particular site is selected. This is especially true when the new activity is proposed to be sited in the heart of a sensitive natural area and vital preserve of regional biodiversity.

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<sup>18</sup> Nomad Ecology, Biological Resource Assessment for the proposed Wildcat Canyon Flow Trail, at 1 (November 2022).

<sup>19</sup> *Id.*

<sup>20</sup> This should include a full evaluation of the still-unfolding pilot project at New Briones Hill Regional Park; *see* Park Advisory Committee Mtg. Staff Report, June 27, 2022; link to presentation: <https://ebparks.primegov.com/Portal/Meeting?meetingTemplateId=2874>.

<sup>21</sup> Public Resource Code §§ 21000 et seq.

<sup>22</sup> *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.

Importantly, the BRA acknowledges that the proposed Wildcat Canyon Flow Trail corridor is located in an area that may provide habitat for protected and sensitive species, including Alameda whipsnake (*Masticophis lateralis euryxanthus*), California red-legged frog (*Rana draytonii*), Crotch bumble bee (*Bombus crotchii*), Western bumble bee (*Bombus occidentalis*), White-tailed kite (*Elanus leucurus*), Golden eagle (*Aquila chrysaetos*), and Monarch butterfly – California overwintering population (*Danaus plexippus* pop. 1).<sup>23</sup> It is also home to sensitive plant species. Preservation of biodiversity is an essential value of Wildcat Canyon, which provides an important refuge from the more intensive recreational use of surrounding parklands – not only for plants and wildlife, but also for human health and well-being.<sup>24</sup>

## Conclusion

For the above-stated reasons, it is important to proceed with proper planning level analysis and environmental review before committing to locate a flow trail in the heart of Wildcat Canyon Regional Park. A planning process that considers all park resources is necessary to provide locations for mountain biking that will ensure protection of habitat and provide for the safety of hikers and equestrians. Accordingly, SPRAWLDEF respectfully requests that the Board approach this through a Land Use Plan Amendment process and prepare and EIR that will ensure careful consideration of potentially significant environmental impacts and evaluate potential alternatives to the present proposal before committing to a specific location and design.

Thank you for your consideration.

Sincerely,



Jessica L. Blome  
Susann Bradford  
Greenfire Law, PC

Enclosure: Exhibit A

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<sup>23</sup> See Nomad Ecology, Biological Resource Assessment for the proposed Wildcat Canyon Flow Trail, Appendix C, pp. C-1 – C-8 (November 2022).

<sup>24</sup> See Wildcat Canyon Regional Park, Final Land Use-Development Plan and Environmental Impact Report, at 26 (Sept. 10, 1985).

## **Exhibit A**



Havey Canyon looking south – Wildcat Canyon Regional Park

Public planning, process, and park management problems associated with a mountain biking-only downhill trail in Havey Canyon - Wildcat Canyon Regional Park

*Planning and process issues with this biking-only trail project.....*

- Project proceeded with **no evident agendized Board item or approval**.
- The project would add a “Recreation Unit” in the middle of a Regional Park with **no “Land Use Plan Amendment” with consideration of alternatives** so that planning for Wildcat sustains park wildlife and flora and achieves a desirable trail experience for all.
- No plan or funding to repair **damage to nearby walking-only trails** arising from illegal mountain biking.
- No plan to **close and restore rogue trails** in Wildcat and Tilden.
- The claim that opening mountain bike-only trails will remove rogue trail building and unpermitted mountain bike use of narrow hiking trails is the intended purpose of the **2 year Briones trails pilot that's just beginning**.
- ALL trails in Wildcat are **open to mountain biking already**
- **An overall trail plan is needed** to achieve a safe and desirable trail experience for ALL trail users in light of issues recognized by the Park District: increased trail use, trail conflicts between hiking/equestrian and mountain biking uses, trail disrepair, estimates of a growing future regional population, and providing healthy habitat for park flora and wildlife in a time of climate stresses.

## WILDCAT BIKE TRAIL PROJECT

The East Bay Regional Park District invites you to learn more about a potential bike trail in Wildcat Canyon Regional Park.



**Tuesday, April 25th, 2023  
at 7pm at the link on our website  
(click the QR code below)**

To address increased popularity of mountain biking, the Park District is exploring additional bike access in Wildcat Canyon Regional Park. Park District staff has identified a conceptual trail corridor that avoids or minimizes impacts to sensitive plant and animal communities based upon preliminary resource surveys. These studies and feedback from the community will be used to further develop a trail project that benefits the park experience for all.

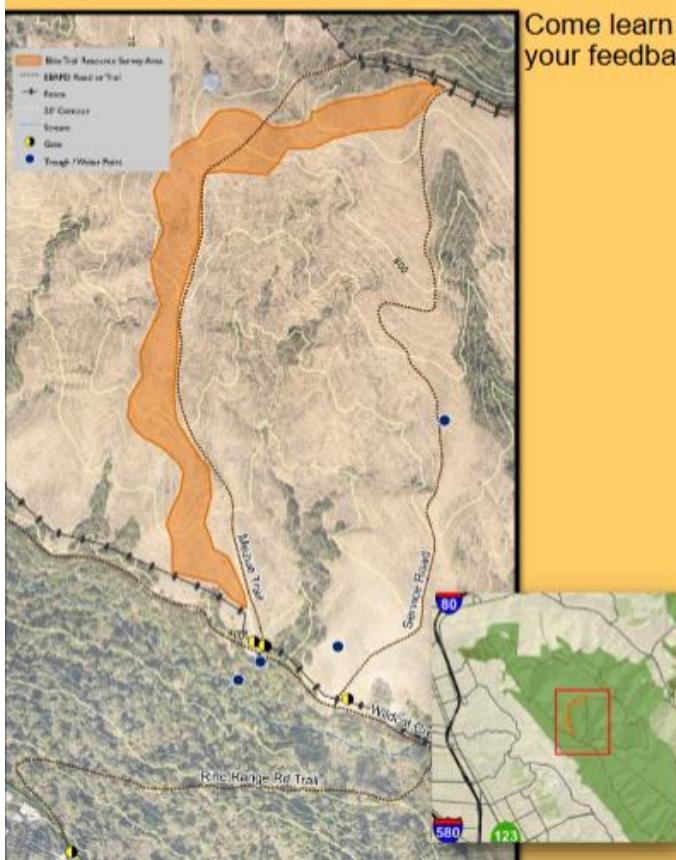
Why isn't the acknowledged increase in hiking included so that there is an overall planning approach to current and future park trail needs for all trail users?

Aren't all Wildcat trails open to both mountain biking and hiking?

Through what public process?

What is the evidence and explanation behind this claim?

*Bigger picture – Other trails and trail experiences are impacted by adding a recreation unit in Havey Canyon*

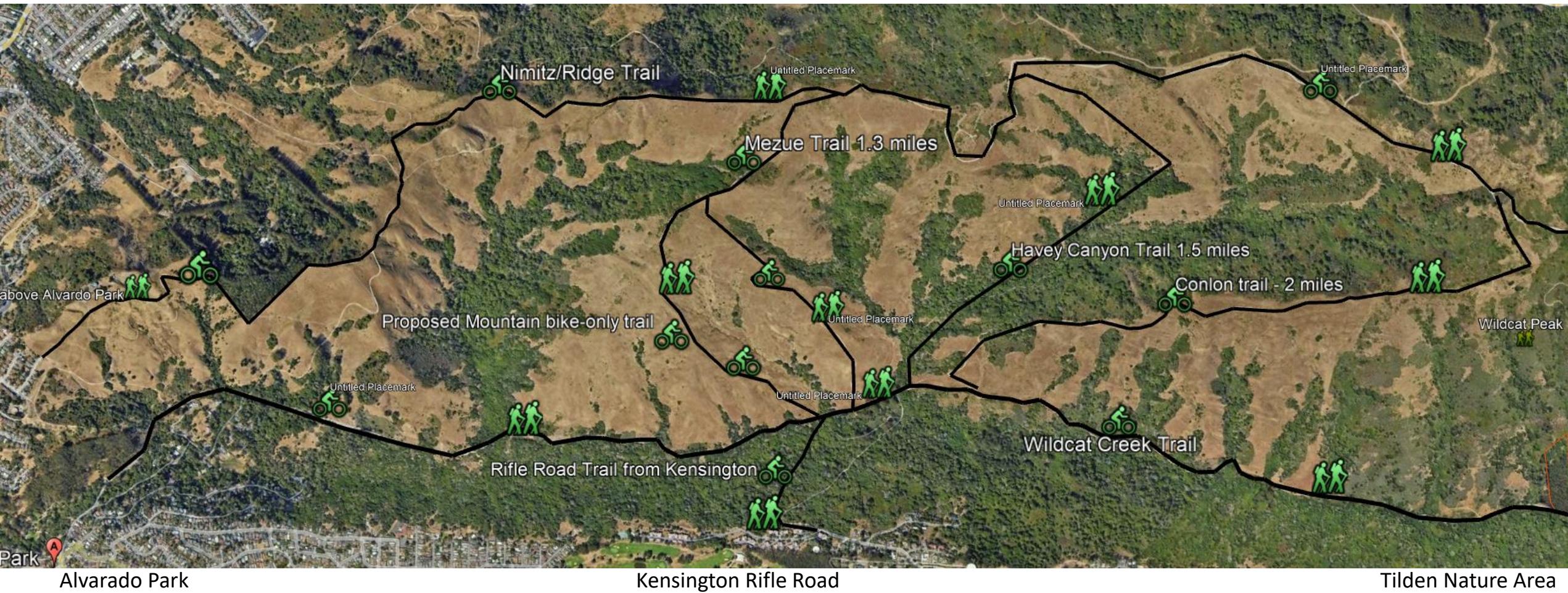


Come learn  
your feedba

1



*Bigger Picture* – there are many trails in Wildcat Regional Park that are legally open to both mountain biking and hiking



*Some of the major existing trails open to both mountain biking and hiking*

*There are also unaddressed Wildcat-Tilden area trail issues:*  
**Safety on walking trails**

*Nearby narrow **walking trails** in the Tilden Nature area with accompanying online MTB speed records:*

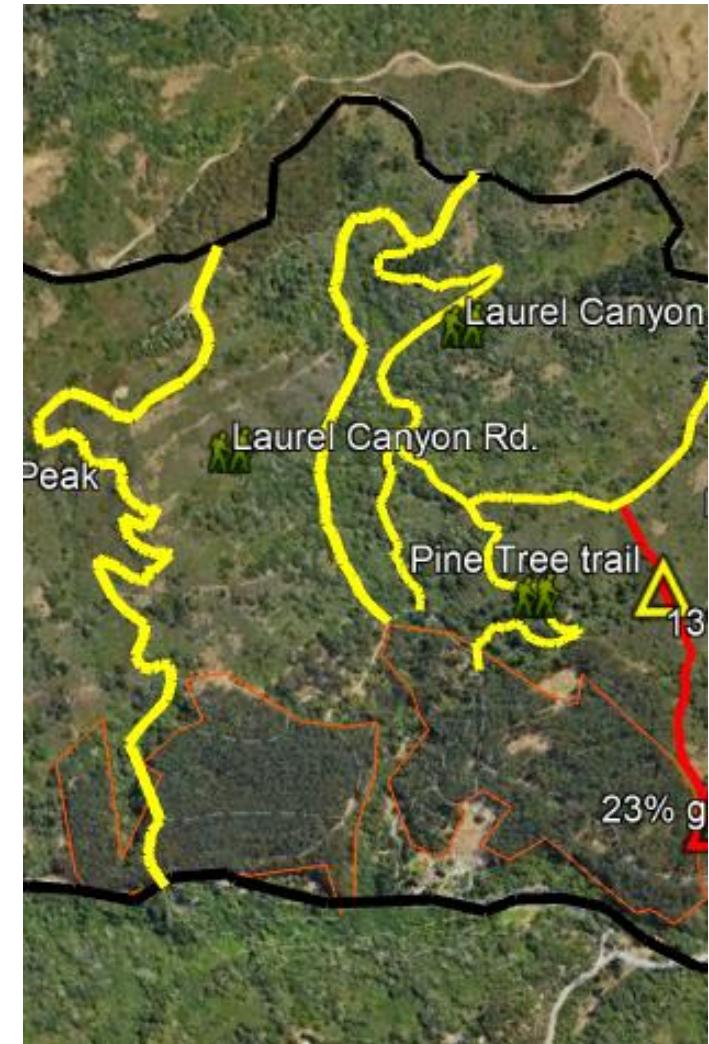
*Wildcat Peak Trail* – aka “Peek a boo”, 1463 online recorded attempts, top speed: 21.4 mph

*Laurel Canyon Road Trail* – aka “Laurel Canyon descent”, 269 online recorded MTB attempts, top speed: 24.6 mph

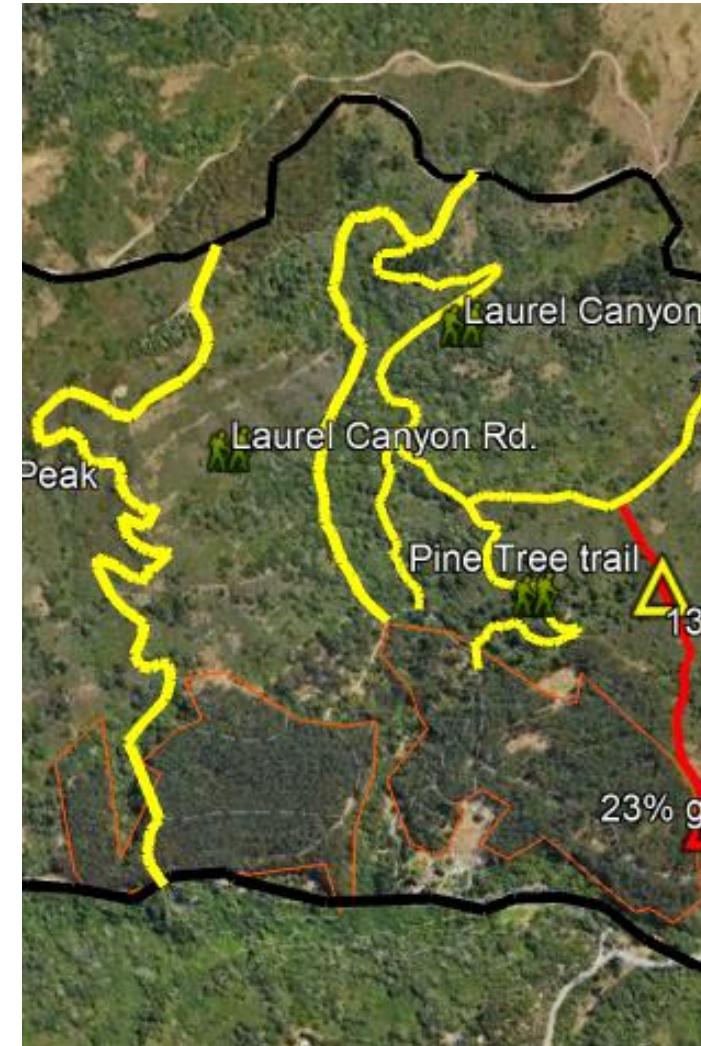
*Laurel Canyon Trail* – MTB aka “Laurel Canyon Trail DH”, 198 recorded online MTB attempts, top speed: 13.8 mph

*Pine Tree Trail* – aka “Power Pine”, 48 recorded MTB online attempts: top speed 10.2 mph

Reference: Strava records 4/2023

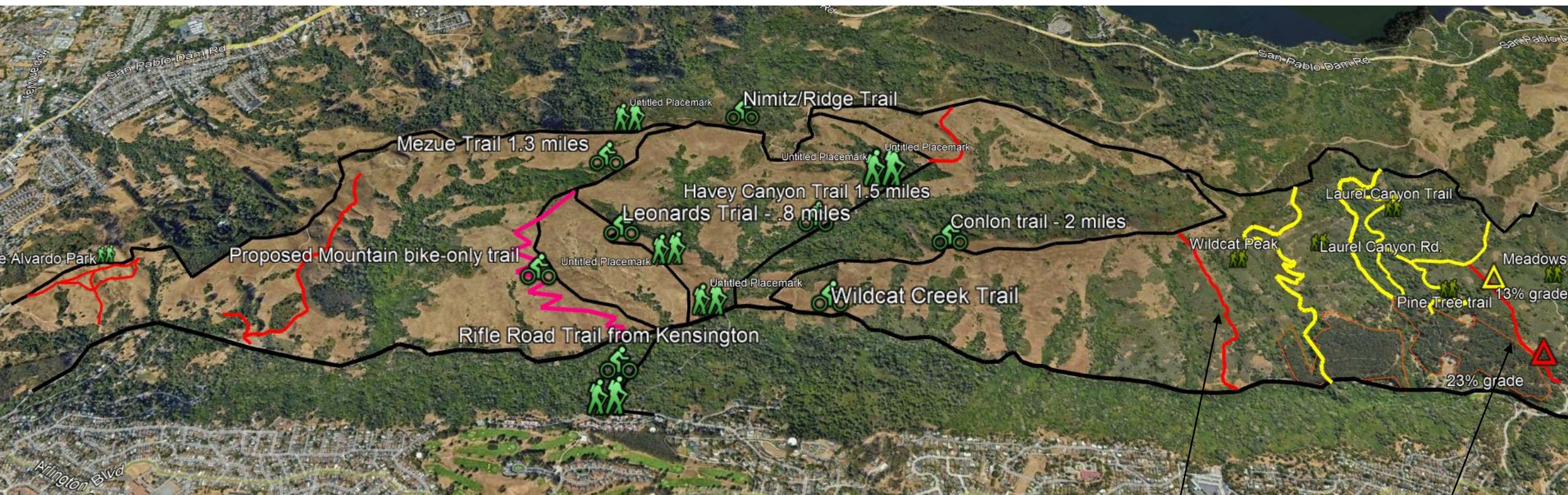


*Unaddressed Wildcat-Tilden area trail issues:*  
**Damage to walking trails**

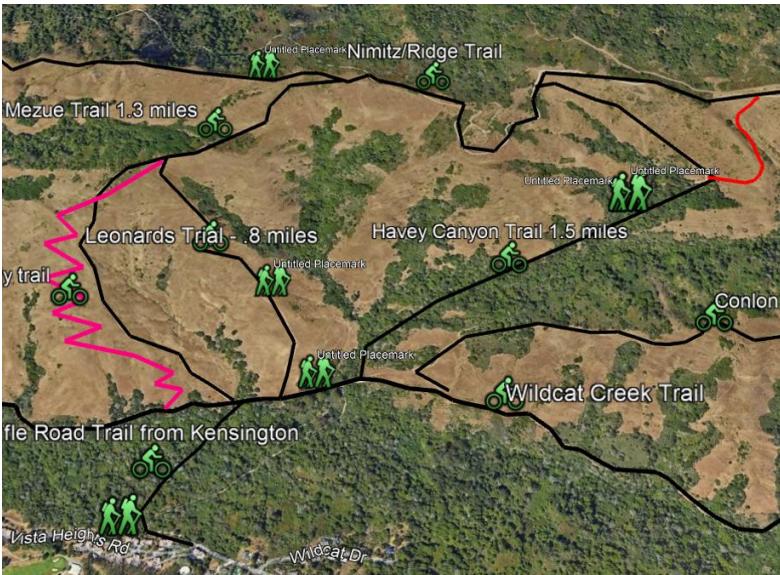


Photos taken from nearby hiking-only trails in Tilden Nature Area (yellow lines)

# Unaddressed Wildcat-Tilden area trails issues: Rogue MTB trails



# Unaddressed Wildcat-Tilden area trails issues: Havey Canyon Impacts



Havey Canyon Trail



MTB activity while trail closed for wet conditions

The **Havey Canyon Trail** runs along a creek and is arguably the most desirable walking trail in Wildcat Regional Park

Walking the trail, one knows that trail rules are not followed by MTB's, including high downhill speeds and by biking the trail when it is closed due to muddy conditions.

Because it has a *milder grade* than the surrounding access trails to this proposed MTB downhill speed trail, it has been, and will continue to be used by MTB's to reach the ridgeline.

Currently, it is also very attractive as a *downhill* speed trail. Aka "Havey Canyon Downhill" has 13,587 recorded online MTB attempts (top speed: 26.5 mph). There's no reason to suggest that the trail's biking popularity would change by building a new MTB trail only.

Reference: Strava 4/2023

## *Unaddressed Wildcat-Tilden area trails issues: Current park conditions*

In addition to the problems of placing a recreation unit in the middle of a Regional Park, no overall park Land Use Plan Amendment, lack of repair or safe use of nearby walking trails, there are evident park repair issues requiring attention and resources. A few examples are:



Wildcat Creek Trail condition at parking area

Major slide on Wildcat Creek Trail prevents emergency access



Conditions of Briones Diablo View (left) and Alhambra Creek bank trails (below). The Alhambra Creek Trail is not scheduled for restoration as part of the Briones Trails Pilot despite years of wear from mountain biking and hiking.



## *Unaddressed Wildcat-Tilden area trails issues: Public information*

Very limited notification of 4/25 public meeting to park users who would be affected by adding a major MTB downhill trail

One small 8.5 x 11" flyer in small type stapled at Alvarado Park Staging Area (see blue arrow)



Note: A 8.5x11" and a larger flyer was posted on the Rifle Range Rd. entrance fence, but below eye level. A 8.5 x 11" flyer was posted on at the Tilden Nature Area gate leading to Wildcat.

The location of the proposed downhill trails from the is unclear from the flyer.



No public meeting notifications in Havey Canyon area where the proposed MTB downhill trail would be constructed - Mezue Trail gate (above) and Wildcat Creek Trail entry (below)

## **Appendix B**



June 21, 2023

**VIA EMAIL ONLY**

Dennis Waespi, President &

Directors Colin Coffey, Ellen Corbett, Elizabeth Echols, John Mercurio, Dee Rosario, Olivia Sanwong  
East Bay Regional Park District  
2950 Peralta Oaks Court  
Oakland, CA 94605

Re: Bias in planning Wildcat Flow Trail & Loss of Trust in Park District Process

Dear President Waespi and Directors Coffey, Corbett, Echols, Mercurio, Rosario, and Sanwong:

Environmental groups have expressed concerns over the proposed Wildcat Park Bike Flow Trail. After receiving documents in response to a Public Records Act request, our concerns have increased and so should yours.

The evidence shows that the park district intentionally engaged in proceeding with this flow trail in secret and bypassed the very open public process it claimed was supposed to deal with issues concerning expanding mountain bike use in our parks. Trails have impacts on wildlife as well as park experience for all users, and the public process to hear from stakeholders is key to maintaining the public trust. Instead, the documentation shows that the park district is planning trails for a special interest, mountain bikes, to the exclusion of other users and to the harm that such special interest planning causes to habitat and wildlife.

Park Board and staff meetings with constituents and organizations with particular interests and projects is a normal and necessary part of governance to help in guiding the direction of our parks in ways that coincide with the park district's mission. However, there is a big difference between park stakeholders communicating their particular interests to board members and staff, and district staff planning and advocating for the interest of one stakeholder at the exclusion of all others.

The documents reveal how the park district staff have been pretending to be inclusive and equitable in creating its trail policy but have actually been planning this new trail in secret with only one user group, mountain bikers, for two years.

Most disturbing is that during the same time period the park district created a process for *all* users to come together to work out in a publicly open process how to identify and propose solutions to the very real user conflicts and habitat and wildlife impacts from mountain bike access in the parks. The process was the formation of the Trail Users Working Group (TUWG). But park district staff ignored

this open, transparent process and the park district's very own legally mandated requirements of enacting a land use plan amendment for this park in order to establish a new trail. Instead, park staff began meeting privately with and sharing internal staff discussions and analyses with mountain bike advocates, while telling the other park users that this same information cannot be made public.

Thus, park district staff have worked in secret with a special interest group to promote a major recreational change to the Wildcat Canyon Regional Park Land Use Plan without prior board authorization at a publicly noticed meeting and demonstrated clear bias in favor of one interest group over the public at large.

If credibility on this issue is to be re-established, then the board of directors and the general manager must initiate a land use plan amendment for any new trail in Wildcat Canyon Regional Park.

Sincerely yours,  
/s/Norman La Force  
Chair, East Bay Public Lands Committee  
President, SPRAWLDEF

/s/ Glenn Phillips  
Glenn Phillips  
Executive Director, Golden Gate Audubon

See timeline below.

# THE KEY DOCUMENTS

## BACKGROUND

### 2020

**August 20, 2020** – Trail User Working Group (TUWG) was convened by park district staff at the first meeting.

**December 21, 2020** - Cortis Cooper, Scott Bartlebaugh, and Austin McInerny representing mountain bike interests met with Director Elizabeth Echols to discuss trail usage issues in Tilden/Wildcat Parks.<sup>1</sup>

NOTE: This meeting is one that is not objectionable. Park directors can meet with any person or organization who is lobbying for action by the park district.

### 2021

**January 25, 2021** - Director Echols sent an email to Cooper, Bartlebaugh and McInerny that she has talked with former Assistant General Manager Kristina Kelchner and that Kelchner has recommended that they meet with Park District Trails Program Manager Sean Dougan. They meet on February 25, 2021.

**April 12, 2021** - Bartlebaugh, in what is described as a “Follow up on Wildcat Canyon trail addition discussion,” provides Dougan with letters from BTCEB (Bicycle Trails Council of the East Bay) stating that they would provide trail maintenance, and that they can provide information on funding that other mountain bicycle groups have provided for trial maintenance for mountain bike trails in parks.

NOTE: While this information is, on its own, not collusive, it does show that *a special interest is seeking to purchase special access and use with promises of money*.

**April 13, 2021** - Dougan emails Bartlebaugh and Cooper telling them that it is too early to determine what the park district’s approach will be but will keep them in the loop. Bartlebaugh responds the same day asking to be informed of future field visits and to learn more about the evaluation process and timeline for future discussions.

NOTE: Up to this point, the discussions among directors, staff, and mountain bike advocates are legitimate lobbying. But it is important to keep in mind that Dougan makes no effort to reach out to the Sierra Club, California Native Plant Society (CNPS), or Golden Gate Audubon Society (GGAS) to keep

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<sup>1</sup> Cooper identifies himself as the head coach for student Nor-Cal Mountain Bike Team. Bartlebaugh is identified as the Advocacy Director for the BTCEB, Bicycle Trails Council of the East Bay. McInerny is former President of the National Interscholastic Cycling Association.

them “in the loop.” Nor is the TUWG informed about this proposed trail. Next are communications that are done privately without public knowledge.

## PREFERENTIAL AND BIASED STAFF BEHAVIOR BEGINS

What follows shows how park district staff then released insider information to the bicycle advocates, but not other stakeholders, and actively worked with only the mountain bike advocates on setting up meetings and providing them with insider information.

**May 19, 2021** - Cooper emails Dougan, copying Bartlebaugh, Echols and two others, noting that Dougan has made progress on the proposed Wildcat Bike Flow Trail. Cooper also tells Dougan that he has talked with private donors who offered to provide \$1 million to construct the Wildcat Bike Flow Trail, and that they are getting impatient and may look for other opportunities for those funds. He asks if there is anything he can do to move the flow trail investigation up on the priority list.

NOTE: Even though Dougan had previously informed Cooper and Bartlebaugh that it is too early to determine what the park district will do, he has gone forward with work on the Wildcat Bike Flow Trail. Moreover, Cooper now privately promises \$1 million to actually build the trail.

**May 21, 2021** - Dougan responds that he is looking at various alignments in Wildcat Canyon, and that they were “recently assessed by our biologists and botanists and grazing team” in Stewardship. He further states, “I would actively pursue everything I could to analyze this area and consider this proposal.”

NOTE: At this juncture, Dougan has not made any attempt to contact other stakeholder user groups to discuss with them this proposal or inform them that staff is analyzing the alignments for environmental impacts. Nor is there any authorization from the board of directors at a publicly agendized meeting to pursue the Wildcat Bike Flow Trail as an option, or to specifically authorize staff time or funding for the work that Dougan has already had done.

**July 27, 2021** - Meanwhile, Juliana Schirmer with the Regional Parks Foundation sends over to Cooper a draft gift agreement for the Wildcat Canyon Bike Flow Trail. Dougan had previously put her in contact with Cooper in response to Cooper’s promise for donors giving the park district a restricted sum of \$1 million for the construction of the Wildcat Bike Flow Trail.

**July 28, 2021** - Dougan emails Cooper asking for information on bike-group-usage statistics, saying, “I could really use that as an intro to my sales pitch with the GM.” He then provides a detailed outline of the steps that would need to be taken. He makes reference to, “Gain support from the TUWG [Trail User Working Group] and other communities to move forward (Fall 2021).”

NOTE: No insider knowledge is provided to other stakeholders. There is some information at this time that some kind of bike trail is being discussed for Wildcat Canyon, but we are told there is nothing to present in public. Moreover, despite the fact that Sierra Club and other organizations have stated this bike trail would be a good subject for discussion at the TUWG, the proposal is consistently *rejected by the park district staff as not within the purview of the TUWG*, in contradiction to what Dougan stated to Cooper.

**October 28, 2021** - Dougan tells Cooper that he will send a Zoom invite for November 2, if that works for Cooper. He copies Barbara Smith, also a bike advocate, and Juliana Schirmer.

NOTE: Neither Dougan nor any other park district staff make any effort to create a Zoom invite for other stakeholders or user groups.

## HIDDEN PREFERENTIAL TREATMENT INTENSIFIES

**November 2, 2021** - Dougan emails Cooper copying Schirmer under the subject line Trail Advocacy and attaches a Wildcat Canyon Flow Trail proposal document. Dougan tells Cooper, "I created this proposal that I thought I'd share with you." Dougan continues, "here are a few important contacts for you...." Dougan provides names and contact information, stating, "I am not sure how big you want this, so just throwing ideas out." He also tells Cooper that will get photos and other graphics to help him.

NOTE: We have Dougan, the park district's Trails Program Manager, actively providing information on how to organize and lobby for the flow trail while keeping other user groups in the dark. Dougan's bias is obvious. It is astounding that even though there is no park district approval for this trail, Dougan is telling one special user group how to organize to influence the park district.

**November 5, 2021** - Cooper emails Dougan, sending him the draft of a one-page petition and asks Dougan for "improvements you think are needed." Cooper tells Dougan that he is meeting with Scott Bartlebaugh, Austin McInerny and Joel Shrock to discuss a campaign strategy.

**November 9, 2021** - Dougan makes reference to "my other comments apply to both the one page and the petition along with Juliana's [Shirmer]."

NOTE: We do not have those comments. Nothing was produced, but it is clear that Dougan has provided comments for a petition for one user group showing clear bias and clear disregard for other user groups.

**December 13, 2021** - Dougan emails Cooper telling him what the park district is going to study, and that they will get some plant and biological surveys going. He tells Cooper, "We'll need to hold a public engagement campaign outside of the CEQA process, which I am advised is the best. I'll let you know if I hear anything that changes the course for the better or worse, if it comes up. Stay tuned!"

NOTE: This is clear bias and improper action on the part of the park staff over a trail and an issue that is controversial. Moreover, it is clear that Dougan is determined to make this particular bike trail happen, despite the fact that the board has yet to publicly agendize an action approving all that has gone on internally.

**January 13, 2022** - Becky Tuden, Ecological Services Manager in the park district's Stewardship Department, emails Dougan and others in regard to an upcoming site visit by park district staff and Directors Echols and Rosario. "I talked about this site visit with Matt [Graul - head of Stewardship]. We decided it is not a good practice to provide pre-decisional comments on a proposed project to individual Board members (*and outside members of the public.*)" (Emphasis added.)

NOTE: This is important because in an April 21 email below Dougan disregards this admonition and specifically provides mountain bike advocates with just such comments.

**January 19, 2022** - Dougan confirms in an email that Directors Echols and Rosario and he will meet with Cooper and others at the proposed trail.

NOTE: Again, no attempt was made to include the environmental community and other user groups in this trail meeting.

**February 2022** - Trail User Working Group comes to an end.

NOTE: At no time while the Trail User Working Group (TUVG) was convened did the park district inform members of the TUVG that the staff was working on a bicycle flow trail in Wildcat Canyon Regional Park or seek input from the TUVG about it. This would have been an excellent proposal for the TUVG to discuss.

**February 3, 2022** - Dougan emails Cooper, Schirmer, Smith, Bartlebaugh, and McInerny giving them insider information about studies of the proposed bike flow trail, including plant surveys and "any fatal flaws in this location." He then writes, "Basically the wheels are in motion, and we now need to let this period run its course."

NOTE: During this same time period, Dougan makes no effort to discuss these issues with other user groups. In fact, the park district's response to those of us from Sierra Club, CNPS and GGAS is that we **cannot** have access to this information because it is **not public**.

**April 21, 2022** - In an email on this date to Cooper and Smith, Dougan responds to Cooper's email to him about any update on the environmental studies. Dougan writes, "So far so good." He then provides additional information that *Tuden had told him was not to be made public as noted above*, stating, "I don't want to get ahead of our Board or other management, *so if you don't mind please keep this additional information between you and I [sic].*" (Emphasis added.) The additional information is that: (1) no rare plants were found; (2) there are some stands of native grasslands; (3) there are no wetlands in the study area, and that Nomad (the consultant), will be "saying there are no wetlands."

NOTE: Dougan admits that he is providing the mountain bike advocates with information that Tuden told him was not to be disclosed outside of the staff at the park district and then tells bike advocates Cooper and Smith that they are to keep this information to themselves! When the Sierra Club and other environmental groups asked about the status of the environmental findings, we are told that no such information can be made public and that this information will be made public at a later date. The

email shows that the mountain bike advocates are getting special insider information and even told not to disclose it, an admission that it was information that should not have been given to any outside user group.

**June 2, 2022** - Cooper emails the park district's Chief of Planning Brian Holt and tells him how he should respond to a question from a member of the Park Advisory Committee about the bike flow trail. Dougan asks the mountain bike community to show up for photos with the subject line, "Volunteers Needed for EBRPD Trails are for Everyone Photoshoot." Dougan emails McInerny and Cooper and asks them to get him bikers who will show up in a special photo shoot.

NOTE: The staff-orchestrated advocacy is further demonstrated in emails on:

**November 30, 2022** - Dougan gives insider knowledge of the park board's December 2, 2022 study session on trails to Cooper, Bartlebaugh, and McInerny and tells them about the stewardship review and how funds are approved for the trail, *all prior to the December 2 study session.*

Dougan further tells the mountain bikers that they need to get advocates to this meeting, stating, "I will only say having a large crowd is overwhelming for our Board (specifically Director Coffey)." He further states that other "groups are not following the same rule book as we've seen." (Emphasis added.)

NOTE: Just what is meant by the reference to a different "rule book" is unclear. It appears to be a statement that the Sierra Club and other organizations want the park district to follow proper planning processes, which the staff does not want to do.

**December 1, 2022** - Dougan sends Cooper, Bartlebaugh, Smith, and McInerny the November 30, 2022 Sierra Club letter to the board in regard to the board's December 2 study session. This letter outlined concerns Sierra Club had regarding the bike trail.

NOTE: So biased is Dougan that he apparently sent the bike advocates the letter so that they can be ready to counter and address the issues that were raised in that letter. There was no Public Records Act request from any of those bike advocates to produce this letter to them, yet Dougan took it upon himself to give them the document. In sharp contrast, Dougan did not bother to send to Sierra Club, CNPS, GGAS, or other stakeholder groups the communications he has had over the years with the mountain bike community.

**December 2, 2022** - The board holds a study session on trails. By law the board cannot take any action at a study session.

**December 7, 2022** - The board holds a full board meeting. At public comment on matters not on the agenda, mountain bike advocates ask for board support for a Wildcat Canyon bike trail. The mountain bike advocates submitted a petition in support of that trail. This is the same petition that Dougan earlier provided comments on to the mountain bike advocates as to what to put in it.

NOTE: Since this is a matter not on the agenda, other user groups would not have known about this presentation (which is legal because one can make comments on matters not on the agenda without notice). Equally important to note is that a governmental body like the park district by law cannot take

action on a matter presented during the non-agenda-item public comment period. For any action to take place, it must be agendized at a subsequent meeting. The board has yet to agendize approval for even studying a bike trail in Wildcat Canyon Regional Park.

## 2023

**March 9, 2023** - Park District Senior Planner Suzanne Wilson emails the mountain bike advocates identified above, and Dougan, about the date for what became the April 25, 2023 public meeting, so that the date was convenient for the mountain bike community.

NOTE: The emails show preferential treatment by specifically asking the mountain bike advocates for the Wildcat Bike Flow Trail for dates that are convenient for them and their organizations for this public meeting. But no such special concern is provided to Sierra Club, CNPS, or GGAS. We were simply informed of the date, regardless of whether that was convenient or not for our groups.

**March 10, 2023** - Bike advocate Cooper tells park staff Wilson and Dougan that he will make sure that the high school student teams show up because, "So far 3 of the 4 teams will 'require' that their students attend. I'm working on a similar commitment with the other teams. Of course 'require' probably means we might get 80% attendance."

NOTE: This is an incredibly damning statement because at that meeting, Sean Dougan talked about how many young people showed up to support this bike trail. This level of attendance is not surprising, considering they are high school students who were told that attendance is "required." Nor does park staff make public that they know that the students were "required" to attend. Moreover, the fact that Dougan failed to disclose this email publicly is even more troublesome and shows that he and others in the park district are not transparent on trails issues.

**April 18, 2023** - Senior Planner Wilson thanks Dougan and bicycle advocates Barbara Smith, Scott Bartlebaugh, Cortis Cooper, and Austin McInerny for all their great ideas for a poll that will show support for the bike trail.

**April 23, 2023** - Bicycle advocate Bartlebaugh warns park staff Holt and Dougan that, "Norman [La Force, Chair of the Sierra Club's East Bay Public Lands Committee] and other stakeholders are stating that the Wildcat Flow Trail is a 'recreation unit' and not a trail. Can you provide some information on the definition of a 'recreation unit....'" The same day, about two hours later, Brian Holt responds as follows: "Scott—thanks for the questions, and I will be prepared to address this in my introductory comments on Wednesday. Feel free to let me know a time to discuss by phone if you would like to talk more."

NOTE: This email shows the depth of the coordination that has occurred.

**April 25, 2023** – The park district holds a public informational meeting on the Wildcat Flow Trail.

NOTE: The summary of this meeting misrepresents the genesis of this project by implying that it came from the Trail User Working Group, when in fact the staff would not allow the Wildcat Flow

Trail to be discussed at TUWG meetings. The summary goes on to state that the park district has “Consulted with Stewardship staff to identify an appropriate corridor,” and “Consulted with Park Operations,” but fails to disclose the long-running exclusive consultation and coordination with only one user group, mountain bikers, detailed above. The summary also fails to disclose that the entire planning process was never authorized by the board of directors.

At the April 25, 2023 meeting Dougan does not disclose that high school student team members were “required” to attend. The orchestrated high attendance of high school mountain bike riders produced predictable lopsided results in the poll taken during the meeting. For example, 162 attendees said that “bike” was their preferred mode of travel within the regional parks, while only 45 said “walk and run.” The meeting is not listed on the park district’s website for public meetings, but is buried in a section referred to as “Projects” and very difficult to find.

The Public Records Act Request production ends at around this time.



# CALIFORNIA NATIVE PLANT SOCIETY

## East Bay Chapter

P.O. Box 5597, Elmwood Station, Berkeley, CA 94705 • [www.ebcnps.org](http://www.ebcnps.org)

June 23, 2023

Dennis Waespi, President &  
Directors Colin Coffey, Ellen Corbett, Elizabeth Echols,  
John Mercurio, Dee Rosario, Olivia Sanwong  
East Bay Regional Park District  
2950 Peralta Oaks Court  
Oakland, CA 94605

VIA EMAIL

### Re: Public Excluded in Planning of Mountain Bike Challenge Trail in Wildcat Canyon Regional Park

Dear President Waespi and Directors Coffey, Corbett, Echols, Mercurio, Rosario, and Sanwong:

This letter concerns a Public Records Act request by the Sierra Club that produced a disturbing stream of email exchanges revealing how East Bay Regional Park District (EBRPD) staff and mountain bike (MTB) advocates quietly devised a plan and engaged in a campaign over two years to construct a new mountain bike challenge (or “flow”) trail in Wildcat Canyon Regional Park without the participation of other park users.

We read from the email exchanges that the location of the mountain bike challenge trail was quietly settled upon in early 2021 by park district staff and MTB advocates. Park staff then proceeded to further advance a downhill challenge trail that staff and MTB advocates selected in the center of Wildcat Canyon Regional Park without any other public involvement. We were also surprised to learn that park staff regularly shared internal information with MTB advocates that was not made available to environmental organizations and the public, including advance information for an April, 2023 Park District public meeting on the proposed project.

Certainly, park staff meetings with constituents and organizations with particular interests and projects are a normal and appropriate part of public agency governance. While park users should communicate their particular interests to board members and staff, when staff devote time and resources to the interests of one trail user group to the exclusion of all others we believe that it does not serve the district or the parks well.

For instance, between August, 2020 and February, 2022, CNPS was one of twenty-nine trail stakeholder representatives the park district convened for a "Trail User Working Group." The group was tasked with working on increased trail use and trail conflicts faced by all park trail users. It met during the same period that park district staff were also quietly proceeding with mountain bike advocates on a new downhill challenge trail. The district's trail working group members brought with them a wealth of trail, age, and background experience, yet park staff never put the development and introduction of this significant new trail project on the trail user group's agenda.

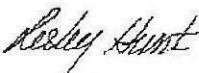
As you know, millions of park users rely on trails to find relief from hectic urban lives and enjoy the natural landscapes, flora, and wildlife in our regional parks. Providing park staff support and advance information to one trail user group to the exclusion of others raises questions about our and the wider public's ability to have a say in the planning and direction of our park trails.

CNPS East Bay and the larger Bay Area public visit and support the regional parks in many ways. To be assured that all park users, including hikers, runners, bikers, people with dogs, equestrians, and people with disabilities, can know about and influence major decisions on our park trails, we support the Sierra Club and Golden Gate Audubon with the request that:

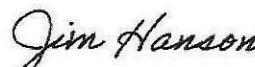
*Your Board start afresh and authorize an updated Wildcat Canyon Regional Park land use plan that focusses on safe and desirable trails for all trail users and the health and stewardship of the park's flora and fauna.*

Thank you for your attention to resolving this matter with a transparent trail planning process that engages all trail users. We look forward to further conversations with the park district about the direction of our trails and the care and stewardship of our native flora.

Sincerely,



Lesley Hunt  
President



Jim Hanson  
Conservation Chair