



SPRAWLDEF

Sustainability, Parks, Recycling And Wildlife Legal Defense Fund

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February 17, 2026

VIA EMAIL ONLY

swilson@ebparks.org

Suzanne Wilson, Senior Planner
East Bay Regional Park District
2950 Peralta Oaks Court
Oakland, CA 94605

Re: Comments regarding NOP for the Wildcat Flow Trail

Dear Ms. Wilson:

These are initial comments regarding the Notice of preparation of the EIR for the proposed Wildcat Canyon Regional Park Flow Trail. They will be supplemented with comments from SPRAWLDEF's legal counsel, Greenfire Law and any further comments from SPRAWLDEF. These comments will focus on the need for the EIR to address the following issues. SPRAWLDEF refers to the proposed trail as a Flow Trail because it is not "just" a mountain bike trail.

The EIR and final approval for the proposed Flow Trail should have:

Compliance with the Following Criteria

- 1) Implementing regulations that are enforceable.
- 2) A monitoring plan that includes the following:
 - a) Identification of impacts being monitored, including impacts to water quality, soils, wildlife and other users (accidents, injuries, and enjoyment of the trail);
 - b) Impact thresholds which, if reached, trigger correction or closure of the trail to bicycles;
 - c) Quantitative and qualitative measurement scales for impacts;
 - d) A schedule for monitoring activities;

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- e) A written reporting system regarding the monitoring and how it is working;
 - f) Training for personnel to follow the monitoring program;
 - g) Specifying baseline inventories to allow for monitoring of trends and impacts;
 - h) Identifying the financial resources for carrying out the monitoring plan;
 - i) Establishing . patrolling for enforcement and for an active monitoring program.
- 3) Demonstration that trail alignment minimizing soil erosion, avoids wetlands, seasonal ponds, sensitive plant and animal habitat and sensitive archaeological and cultural features, especially Native-American sites;
 - 4) Demonstration that trails identified for use .by mountain bikers to go uphill from the bottom area of the Flow Trail minimize soil erosion, avoid wetlands, seasonal ponds, sensitive plant and animal habitat and sensitive archaeological and cultural features, especially Native-American sites;
 - 5) Establishing barriers to prevent mountain bikers from leaving the Flow Trail and also trails to be used for uphill access to the top of the Flow Trail.
 - 6) Enforcement regulations should be clearly posted at appropriate locations such as trail heads and emphasized through agency patrols and outreach programs.
 - 7) A clear written plan for enforcing regularions concering the use of mountain bikes on the proposed trail, the uphill access trails to reach the flow trailstarting point, and finding and eliminating unauthorized or rogue trails.

Evaluation of the Following Alternatives

Under CEQA the EIR must evaluate alternatives to the proposed project. The following alternatives should be evaluated.

Crocket Hills Regional Park

Crockett Hills Regional Park, located in Contra Costa County, California, is a premier East Bay destination for mountain bikers, offering roughly 10 miles of specialized, narrow, bike-optimized flow trails. These trails, including Sugar City, Wood Rat, and Tree Frog, feature, berms, rollers, and table-top jumps, providing a fast, descending experience. The Park District or middle schools and high schools could arrange for shuttles to take bikers to these trails or transform one

of them into a trail set forth in the Pointe Strategies design concept. The Crockett Hills location also would advance the Park District's stated goal of providing a trail experience to bikers in West Contra Costa County, i.e., Richmond, thereby avoiding those bikers from riding on dangerous streets to the proposed location.

Miller Knox Regional park

There are locations in this park on fire roads that could be alternative locations. The Park District has not explored those possibilities.

Location In Tilden Regional Park

There are areas in Tilden Regional park where a flow trail could potentially be constructed. These would require the removal of eucalyptus stands. Removal of these stands would promote safety from a wildfire which would also advance the Park District's vegetation management plan to protect against wildfires and remove a non-native species to help restore native Bay Oak Woodlands.

Location near Alvarado Staging Area in Wildcat Canyon Park

This area is already zoned as recreational. A trail could be built here and would be consistent with the Land Use Plan for Wildcat Canyon Regional park.

Honrick Properties

These properties are located at the Northwest boundary of Wildcat Canyon Regional Park. As reported to the Park District in prior communications, the owner is five years in arrears on property taxes. The Park District could purchase these properties at below market values and locate a flow trail in an area of these properties. See the attached map and current amount owed in property taxes. Exhibits A and B. The property is outlined in yellow with the access road easement between the two parallel lines on the map. In fact, the Park District would not need to purchase all five parcels, but only parcel 435-240-001 or, in addition, if necessary parcel 435-240-002 depending on the topography of parcel 435-240-001.

Assuming this property meets other CEQA criteria, it would be an excellent location for a flow trail that would provide better access to mountain bikers in Northwest Contra Costa County, which Planner Suzanne Wilson has stated is a goal of the flow trail. It would also have a "ready-made" staging area and could become a special bike park area.

Of course, to reiterate, all alternatives would need to be evaluated for wildlife and habitat and for potential environmental impacts.

Documentation of the Increased Numbers of Mountain Bikers Who Will Use the Flow Trail and Their Cumulative Impacts Must be Addressed in the EIR

Park District staff have made public statements that this Flow Trail will merely address existing use in Wildcat Park. This is contradicted by the fact in an email disclosed in a public records act request, staff and one of the mountain bike advocates made it clear that this trail will be for more than just some local high school mountain bikers. In that email, Cortis Cooper, who is one of the mountain bike advocates, gives Brian Holt of the Park District a suggested response to a question “to the effect ‘Isn’t this Wildcat flow trail meant for just a small contingent of high school mtb racers from the local schools?’”

Cooper writes, “To this you rightly replied that many mountain bikers enjoy flow trails. I suggest that the next time you get asked this question you can make the same reply but back it up by stating that over 2000 mountain bikers, primarily from the East Bay, have signed a petition in Dec. 2021 supporting the Wildcat Flow Trail.” In fact, Brian Holt basically stated that this trail would exceed existing use when he referred to “many mountain bikers enjoy flow trails.” See Exhibit C.

The EIR is required to address future cumulative impacts from the proposed project. In this case it is clear that this Flow Trail will draw more than just existing users to the trail and surrounding area. Based on the circulation map from Pointe Strategies these thousands of additional users will access the flow trail from Leonard’s Trail and the Havey Canyon Trail.¹

The EIR must obtain statistically valid evidence of the existing uses of the Mezue, Leonard’s, Havey Canyon Trail, and Oil Well trail for mountain bikers, hikers and equestrians and make projections of additional mountain bikers who would come to use the flow trail. This work should include observing marking dates and times of users and whether they were hikers, bikers, or equestrians. The EIR must also address as a cumulative impact the use of the proposed flow trail for NICA races because it will be designed to “provide a training area for local National Interscholastic Cycling Association (NICA) High School and Middle teams.” One does not design a trail to train for racing unless the trail can also be used for such competitions.

¹ The Park District states that Leonard’s Trail will be closed to mountain bikers, but Park District admits that it has no way to enforce that closure. Therefore, the EIR will need to address mountain bikers accessing the flow trail using Leonard’s Trail and also assuming Leonard’s Trail is not used how many more bikers will use the Havey Canyon Trail which is closer to Leonard’s and the Mezue Trail than the Oil Well Trail

The EIR Must Address the Sighting of the Willow Flycatcher
in the Area Designated for the Flow Trail

The 2026 NOMAD Biological Resource Assessment failed to identify the Willow Flycatcher as a species in the area of designated for the flow trail. This bird species is an endangered species under the California Endangered Species Act that reputable observers have sighted in the area designated for the flow trail. The EIR must include adequate studies over time to further address the presence of the Willow Flycatcher.

Sincerely yours,

Norman La Force

Norman La Force, President

cc: President Sanwong and Directors, Coffey, Deschambault
Echols, Espana, , Mercurio, and Waespi:



EXHIBIT
A

Honrick Redemption taxes due by 3/2/2026

Parcel #	Amount due	Acres
435-080-005-0	\$3,389.16	0.95
435-190-001-6	\$29,723.70	9.24
435-210-001-2	\$7,380.00	2.00
435-210-006-1	\$18,870.91	5.64
435-210-007-9	\$159,380.04	50.03
435-230-005-9	\$27,170.01	8.36
435-240-001-6	\$109,735.45	34.22
435-240-002-4	\$88,034.61	27.37
Total	\$443,683.88	137.81

Redemption Cost = \$3,219.56 per acre



From: Cortis Cooper <cortiscooper@outlook.com>
Sent: Wednesday, May 25, 2022 1:17 PM
To: Brian Holt
Cc: Sean Dougan
Subject: Wildcat Flow

Hi Brian

I've been meaning to email you for some time. During your presentation on new Trails to the PAC a month ago, you were asked by one of the more skeptical PAC members something to the effect "Isn't this Wildcat flow trail meant for just a small contingent of high school mtb racers from the local schools?" To this you rightly replied that many mountain bikers enjoy flow trails. I suggest the next time you get asked this question you can make the same reply but back it up by stating that over 2000 mountain bikers, primarily from the East Bay, have signed a petition in Dec 2021 supporting the Wildcat Flow trail.

Hope you are doing well. We are looking forward to seeing the results from the environmental studies at the end of the summer.

*Cort Cooper
Hensington, CA*

