

The Environmental Checklist for the Wildcat Canyon Bike Trail is a failure whether you are an advocate, opponent or neighbor of the proposed Flow Trail.

Advocates will rue the lack of toilets, lack of waste management, lack of maintenance, significant erosion, and conflict with walkers, hikers, naturalists, and birders that will poison the well for future mountain bike activity (**Figure 6**).

Opponents will rue the loss of one of the best natural history trail in Wildcat Canyon or Tilden Regional Parks, the Havey Canyon trail (**Figure 2**).

Neighbors will rue the influx of hundreds to thousands of Mountain Bike Flow Trail users (**Figure 5**) seeking parking, trashcans, and toilets that are not seriously considered in the Environmental Checklist.

EBRPD ignores 7 major issues that *must be added to the scope of the EIR*, which are noted on the following pages and figures.

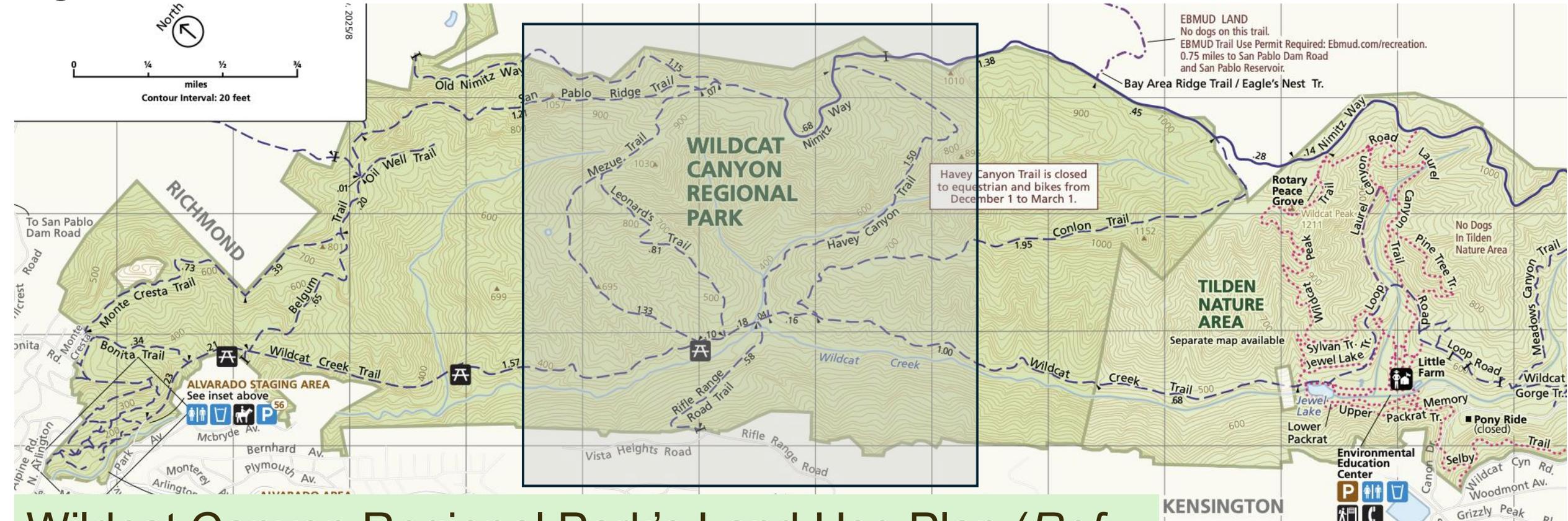
Following the section on major issues is a list of parts of the Environmental Checklist where level of impact should be increased and where existing text is inaccurate.

Ignores the Park Land Use Plan

There is no acknowledgement in the Notice of Preparation (NOP) (*Ref 1*) or Environmental Checklist (*Ref 2*) that the EBRPD Wildcat Canyon Regional Park Land Use Plan (*Ref 3*) calls for preservation of natural features in the area now proposed by EBRPD for construction of the recreational, mountain bike Flow Trail (***Figure 1***). The EIR must consider the conflict between the existing Wildcat Creek Regional Park (WCRP) Land Use Plan and the proposed Flow Trail and how the proposed Flow Trail will degrade the natural features whose protection is a founding principle of the WCRP Land Use Plan (*Ref 3*).

Wildcat Canyon Preserves Nature, Tilden Park Hosts Recreation

Figure 1



Wildcat Canyon Regional Park's Land Use Plan (Ref 3) states, that the park **“will be free from intensive recreation activities, and...devoid of any development except trails for hiking, equestrian and service use.”**

Tilden Regional Park hosts recreational features. Golf Course, Steam Trains, Merry-Go-Round, Little Farm, Nature Area Env. Ed. Ctr., Botanical Garden, Brazilian Building, Lake Anza

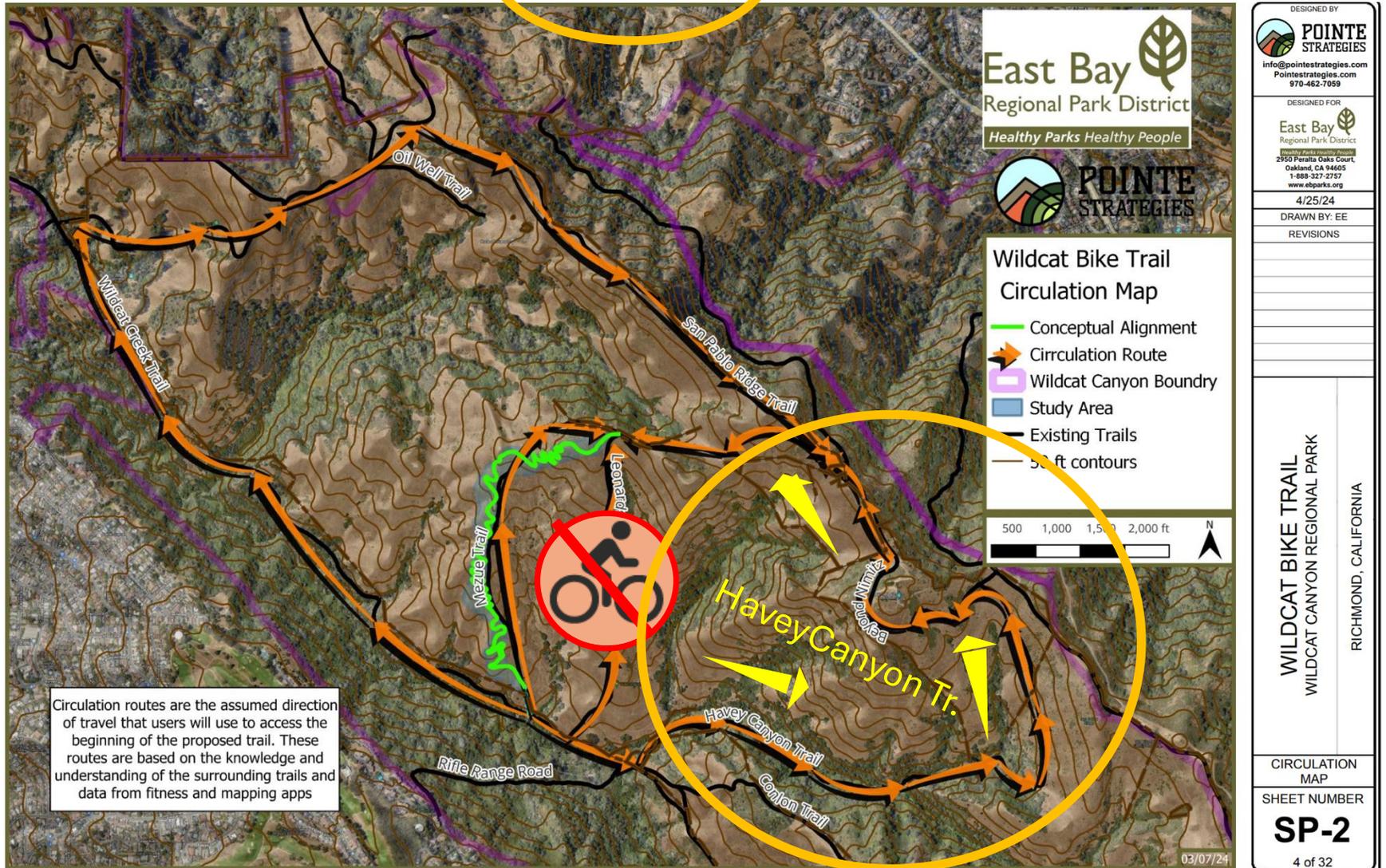
Ignores trails that feed the proposed Flow Trail

There is no acknowledgement in the NOP (*Ref 1*) or Environmental Checklist (*Ref 2*) that the Pointe Strategies Wildcat Canyon Bike Trail Plan (*Ref 4*) as amended by the EBRPD (*Ref 5*) insures that nearly all of the mountain bike travel from the bottom to the top of the Flow Trail will be on the single-track, riparian, Havey Canyon Trail (**Figure 2**, *Ref 5*), which is one of the most biologically significant trails in WCRP or Tilden Regional Park (TRP) in terms of scenery, abundance, and diversity of native plants.

The EIR must study not only the Flow Trail but also the trails that feed the Flow Trail and the trails that allow riders to climb to the start of the Flow Trail for repeat rides. These trails include in order of importance: Havey Canyon trail, Rifle Range Road trail, Nimetz trail, San Pablo Ridge trail, and Wildcat Creek trail (**Figure 2**).

Figure 2

Flow Trail threat to the **Havey Trail**, the heart of Wildcat Canyon's most natural area



Mezue Trail



Leonard's Trail



Havey Trail

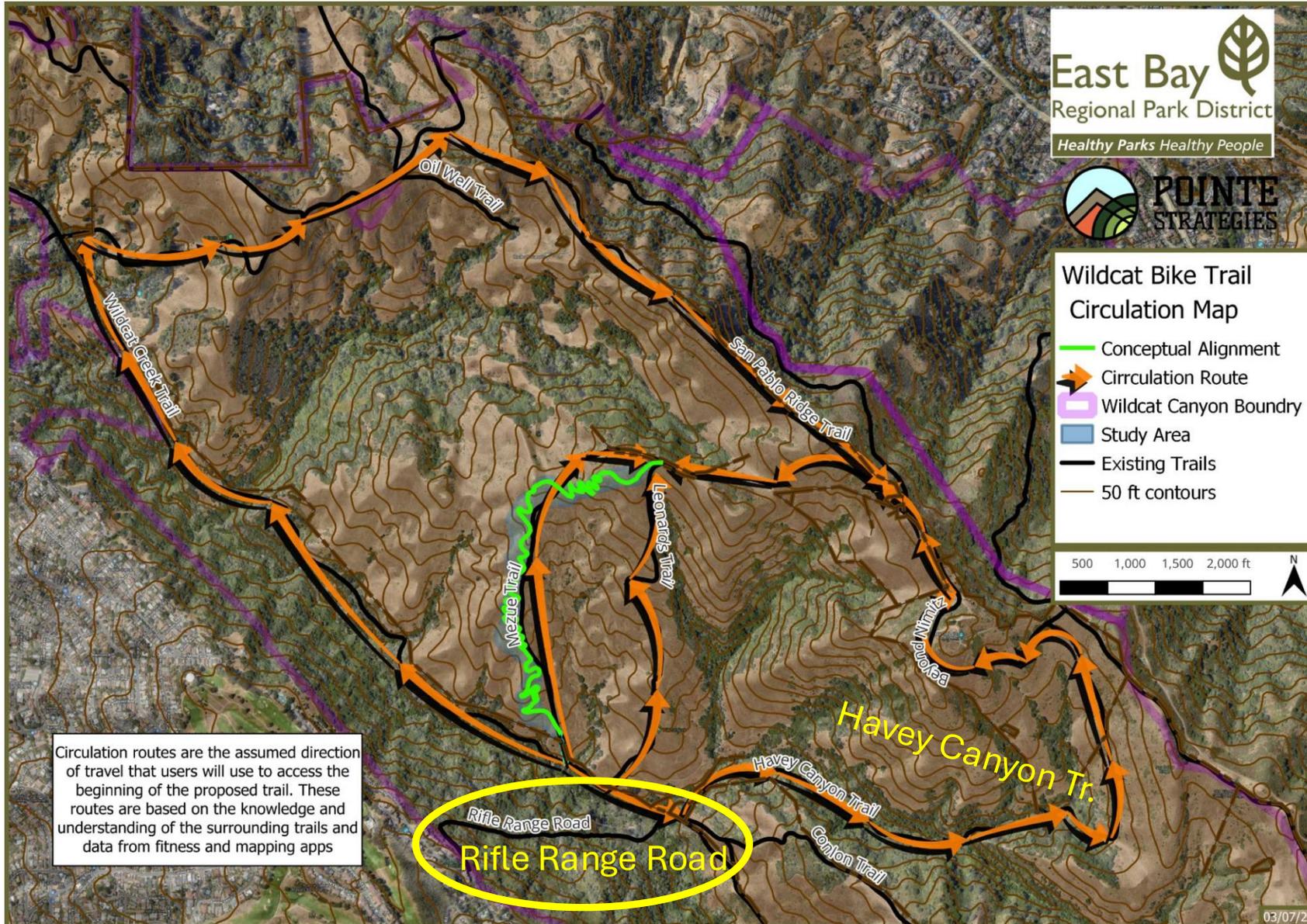


EBRPD declared Leonard's Trail off limits in August 2025 (Ref 5) due to endangered plants, shifting all uphill traffic to the Havey Canyon trail.

Ignores the most convenient Flow Trail access via Rifle Range Road

There is no acknowledgement in the NOP (*Ref 1*) or Environmental Checklist (*Ref 2*) that the mountain bike access point from paved roads closest to the proposed Flow Trail is Rifle Range Road, an access point far closer to the proposed Flow Trail than Alvarado Staging Area to the west or Tilden Nature Area to the east (***Figures 3 and 6, Ref 4***). The EIR must consider parking for riders and supporting persons at all access points served by paved roads, most importantly Rifle Range Road.

Figure 3 Rifle Range Road is the paved road closest to the Flow Trail (Ref 4)



Mileage to the bottom of the Flow Trail from:

- Rifle Range Road, 0.8 mi,**
- from Alvarado, 1.8 mi,**
- from Tilden Nature area, 3.6 mi.**

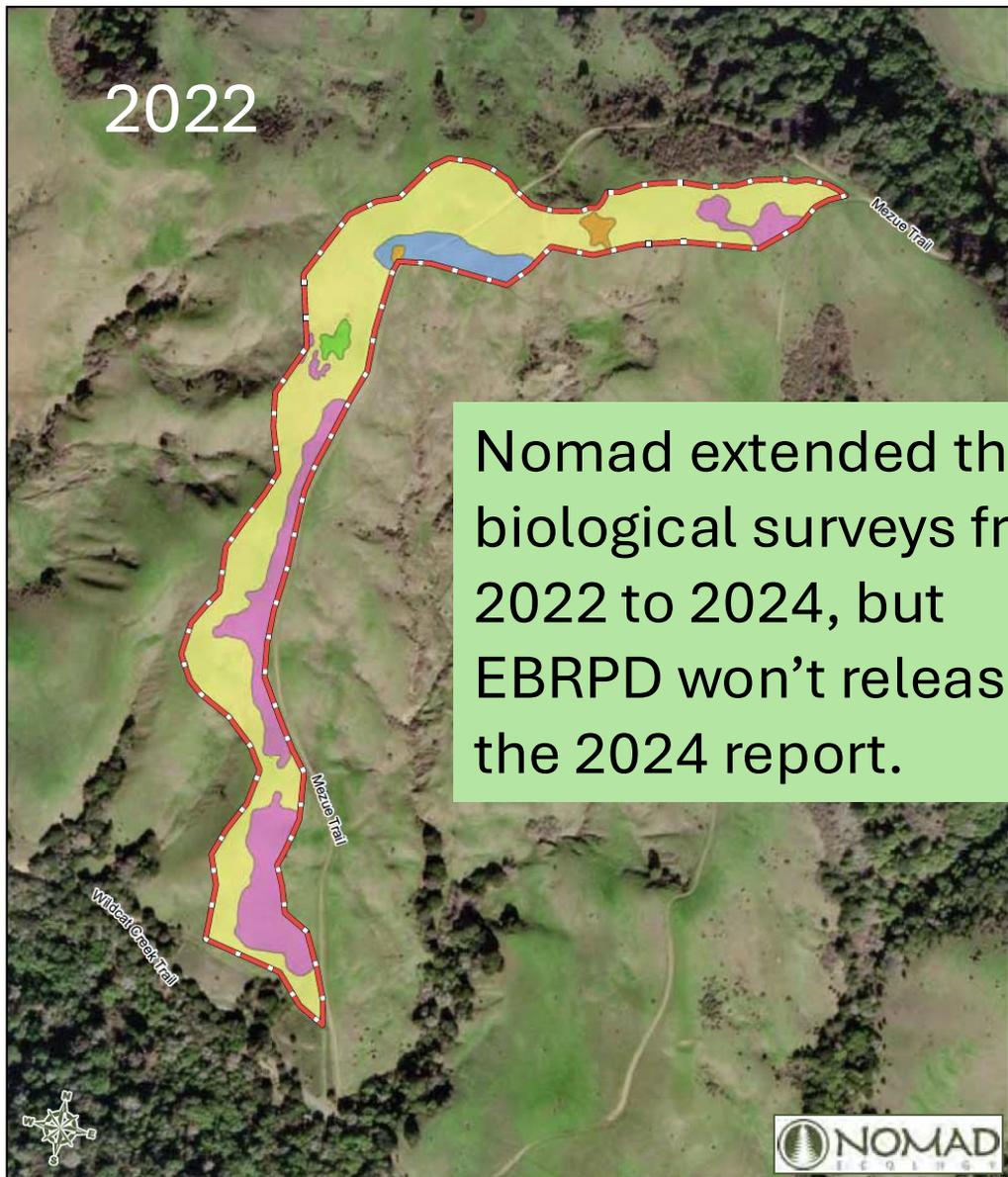
Google Maps

Ignores and suppresses the still hidden 2024 Nomad Ecology report

There is no acknowledgement in the NOP (*Ref 1*) or Environmental Checklist (*Ref 2*) of the existence of, or public access to, the Nomad Ecology 2024 report on the natural features of the area proposed for the Flow Trail. This Nomad Ecology report was presented to the EBRPD in 2024 and was used by EBRPD in a presentation in 2025 (**Figure 4**, *Ref 5*) but has yet to be released. Public access to this report should have preceded notice of the NOP to provide time for the public to evaluate the threats posed to plants (e.g., SantaCruz Tarplant) and animals (e.g., Alameda Whipsnake) found near the proposed Flow Trail and the other trails impacted by creation of the Flow Trail (*Ref 6*). The 30-day comment period must be extended to run for an additional 30 days after the 2024 Nomad Report is made available to the public.

Figure 4

- The trail through...
- Biological wilddry protection this area
- Santa Leonora Leonora direct
- Project removal



Nomad extended their biological surveys from 2022 to 2024, but EBRPD won't release the 2024 report.

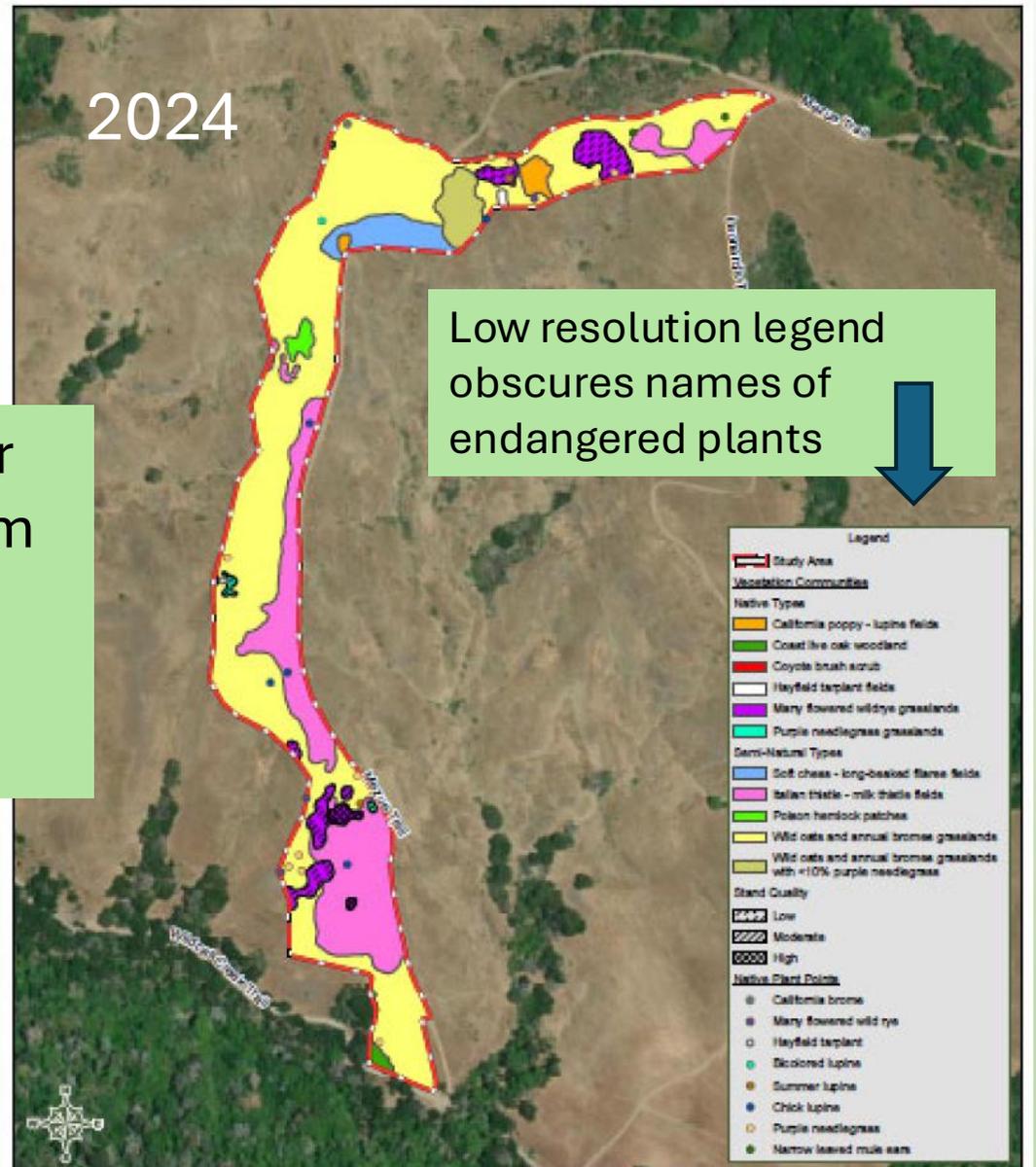


Figure 6
Vegetation Communities in the Study Area
Wildcat Canyon Flow Bike Trail Project
East Bay Regional Park District
Contra Costa County, California

1:4,800
0 200 400 Feet

Legend

Study Area	Italian thistle - milk thistle fields
Vegetation Communities	Poison hemlock patches
Wild oats and annual bromes grasslands	California poppy - lupine fields
Soft chess - long-beaked filaree fields	

Source: EBRPD, Nomad Ecology LLC

Figure 6
Vegetation Communities in the Study Area
Wildcat Canyon Flow Bike Trail Project
East Bay Regional Park District
Contra Costa County, California

1:4,800
0 200 400 Feet

Legend

Study Area	California poppy - lupine fields
Vegetation Communities	Coast live oak woodland
Native Types	Coyote brush scrub
	Hayfield teplant fields
	Many flowered wildrye grasslands
	Purple needlegrass grasslands
Semi-Natural Types	Soft chess - long-beaked filaree fields
	Italian thistle - milk thistle fields
	Poison hemlock patches
	Wild oats and annual bromes grasslands
	Wild oats and annual bromes grasslands with <10% purple needlegrass
Stand Quality	
Low	
Moderate	
High	
Native Plant Points	
	California broom
	Many flowered wild rye
	Hayfield teplant
	Bicolor lupine
	Summer lupine
	Chick lupine
	Purple needlegrass
	Narrow leaved mule ears

Source: EBRPD, Nomad Ecology LLC

Ignores the high Flow Trail participation that makes it a major recreational feature

There is no acknowledgement in the NOP (*Ref 1*) or Environmental Checklist (*Ref 2*) that the proposed Flow Trail will be a major recreational feature of WCRP, as noted by Pointe Strategies, who stipulate that the Flow Trail will be built to qualify as a racecourse by the National Interscholastic Cycling Association (NICA) (**Figure 6**, *Ref. 4*). NICA data on Bay Area NICA mountain bike race results report between 200 and 700 racers at two-day races held each month during the school year (**Figure 5**, *Ref 7*). As large as these numbers are, they account only for high school and middle school students; use by older riders is certain to increase the number of users.

Figure 5

National Interscholastic Cycling Association Race Results (*Ref 7*).

711 total riders at one race meeting, May 3-6, 2025.

472 high school riders (*Ref 7, beginning on page 2*)

239 junior development riders (*Ref 7, beginning on page 19*).

Race meeting with Bay Area riders and some riders from the central coast (San Luis Obispo, Santa Cruz) and Central Valley (Modesto, Sonora), May 3, 2025. Similar race meetings of East Bay riders occurred on March 1, March 23, and April 4 in 2025.

Web sites with data:

NorCal Interscholastic Cycling 2025 Season

Race Results <https://my.raceresult.com/groups/6487/>

05/03/2025 | Novato, United States of America Stoked On Stafford Central/East Bay Regions; High School.

<https://my4.raceresult.com/338751/RRPublish/data/pdf?name=03%20-%20Season%20Overall%20Results%7CIndividual%20Results%20-%20Overall&contest=0&lang=en>

05/03/2025 | Novato, United States of America Stoked On Stafford Central/East Bay Regions; Junior Development

<https://my3.raceresult.com/338762/RRPublish/data/pdf?name=02%20-%20Result%20Lists%7CIndividual%20Results%20-%20ALL&contest=0&lang=en>

Ignores amenities found at recreational features in WCRP and TRP

This high level of usage puts the Flow Trail among the other major recreational sites of WCRP and TRP, including the Steam Trains, the Merry-Go-Round, the Golf Course, the Little Farm, the Botanical Garden, and picnic and camping areas. These recreational sites have essential features in common: paved road access for police, fire and emergency medical services, parking lots for users, toilets, waste collection and removal, drinking water, and supervision (**Figure 6**). There is no consideration in the NOP (*Ref 1*) or Environmental Checklist (*Ref 2*) of paved road access for police, fire or emergency medical services, parking lots, or supervision. There is no serious consideration in the NOP (*Ref 1*) or Environmental Checklist (*Ref 2*) of toilets, waste management and removal, or access to drinking water. All features that accompany existing recreational sites in WCRP and TRP must be given serious consideration in the EIR and planned for in EBRPD budgets.

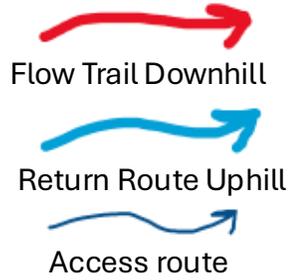
Figure 6 Will absence of amenities at the proposed Mt Bike Flow Trail lead to failure?

Trailhead Amenities

Belgum Tr - Alvarado
 Distance to paved road **0 km**
 Parking lot **Yes**
 Toilets, Water **Yes**
 Trash Cans **Yes**
 Emergency Services **Yes**
 Natural Area Damage **Low**

Flow Trail Amenities

Mezue Trail – Rifle Range Rd
 Distance to paved road **1.4 to 3 km**
 Toilets, Water **No**
 Parking lot **No**
 Trash Cans **No**
 Emergency Services **No**
 Natural Area Damage **High**



Trailhead Amenities

Meadows Tr. - Inspiration Pt
 Distance to paved road **0 km**
 Toilets, Water **Yes**
 Parking lot **Yes**
 Trash Cans **Yes**
 Emergency Services **Yes**
 Natural Area Damage **Low**

Carousel Amenities



Tilden Park Carousel
 Distance to paved road **0 km**
 Toilets, Water **Yes**
 Parking lot **Yes**
 Trash Cans **Yes**
 Emergency Services **Yes**
 Natural Area Damage **Low**

Train Amenities



Tilden Park Steam Trains
 Distance to paved road **0 km**
 Toilets, Water **Yes**
 Parking lot **Yes**
 Trash Cans **Yes**
 Emergency Services **Yes**
 Natural Area Damage **Low**



Flow Trail Lacks Amenities Found at Other Recreational sites.

SITE	Alvarado	Proposed Mezue Flow Trail	Inspiration Point	Tilden Carousel	Tilden Steam Trains
AMENITIES	Staging Area	1.4-3 kilometers	0 kilometers	0 kilometers	0 kilometers
Distance to Paved Road	0 kilometers				
Toilets, Water	Yes	No	Yes	Yes	Yes
Parking lot	Yes	No	Yes	Yes	Yes
Trash Cans	Yes	No	Yes	Yes	Yes
Emergency Services	Yes	No	Yes	Yes	Yes
Natural Area Damage	Low	High	Low	Low	Low

Amenities matter because the Flow Trail will be capable of hosting races of the National Interscholastic Cyclist Association (NICA). Races that include middle and high school students from Berkeley, El Cerrito and Richmond attracted up to 700 racers over weekends in Spring 2025 (Ref 7).

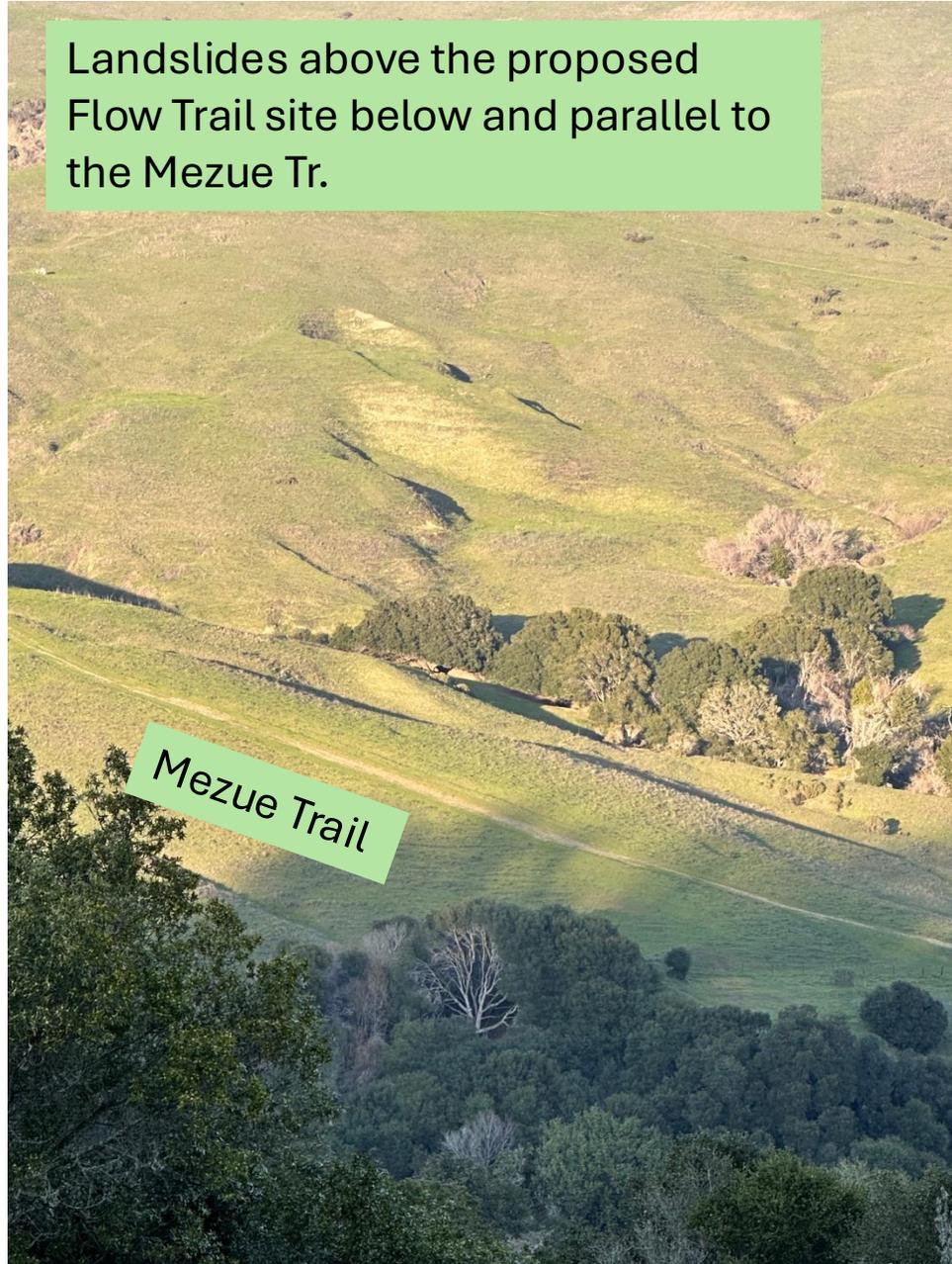
“This area of the trail could serve as an uphill or low grade passing area for NICA or similar types of races.” - Pointe Strategies Design of a Mountain Bike Flow Trail, April 25, 2024, Section 1, Sheets TM-2, TM-3 and TM-4.

https://www.ebparks.org/sites/default/files/Wildcat-Bike-Trail-Conceptual-Design-Submittal_052024.pdf

Ignores Flow Trail effect on drainage and erosion, and trail maintenance

There is no serious consideration in the NOP (*Ref 1*) or Environmental Checklist (*Ref 2*) of the effect of altered drainage on erosion caused by concentration of runoff by the Flow Trail. Nor is there any mention in these documents of budgets for trail maintenance or erosion repair. Neither is there any mention in these documents of how altered drainage will affect the likelihood of landslides and slumps, features that are evident on slopes adjacent to the proposed Flow Trail (***Figure 7***). The EIR must give serious consideration to Flow Trail maintenance, repair of eroded areas, and landslides. The EIR must consider ongoing costs for repair of eroded areas and maintenance of the Flow Trail.

Figure 7 Landslides near the Flow Trail.



References

Reference 1. East Bay Regional Park District Notice of Preparation of an Environmental Impact Report for the Wildcat Canyon Regional Park Bike Trail Project. EBRPD. January 15, 2026

Reference 2. Environmental Checklist. Working Draft – Wildcat Canyon Regional Park Bike Trail. EBRPD. Undated

Reference 3. Wildcat Canyon Regional Park final land use – development plan and environmental impact report. EBRPD. September 10, 1985

Reference 4. Pointe Strategies Wildcat Bike Trail, Pointe Strategies May 2024

Reference 5. Authorization to Issue a Notice of Preparation of an Environmental Impact Report for the Wildcat Bike Trail: Wildcat Canyon Regional Park. EBRPD. August 5, 2025

Reference 6. Bike optimized trail study – Wildcat Canyon Public Workshop #1 Summary Packet. April 25, 2023 (Zoom)

Reference 7. National Interscholastic Cycling Association Race results. NICA. May 3, 2025.

Necessarsy but missing document: Nomad Ecology report. September 2024

Sections in the Environmental Checklist where impact should be increased to “Potentially Significant” and where text is inaccurate.

3.1.b Aesthetics. Increase impact to Potentially Significant – Putting the Flow Trail in the middle of the scenic area of WCRP will substantially damage the resource.

Inaccurate – closest access to the proposed Flow Trail is from Rifle Range Road. EIR must consider the impact of large NICA events at the Flow Trail in terms of parking, toilets, waste management and emergence access.

The project is centrally located within the park and is accessed from the Alvarado Staging Area via the Wildcat Creek Trail or by way of the Nimitz Trail from the Inspiration Point Staging Area.

Inaccurate – There will be a major change in hillside views by the proposed Flow Trail, fence, and major mountain bike events.

Long-term changes to views from scenic vistas would occur from the permanent trail features that would be constructed, including the proposed fencing along the trail.

Inaccurate – the public now has the view from the Mezue trail without having to look at the Flow Trail or avoid mountain bikers.

The long-term visual impacts from permanent project features would be minor due to the site-sensitive design and building materials similar in size and color to features in the park. Trail improvements would provide improved access and opportunities for the public to enjoy the natural landscape. Therefore, the project would have a less-than-significant impact on the quality of public views of the site and its surroundings.

3.7.VII.b and c Geology and Soils. Increase impact to Potentially Significant – Installing the flow trail will cause erosion. Altered runoff is known to cause slumps and landslides.

3.7.VII.b and c

b) Result in substantial soil erosion or the loss of topsoil?

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

3.10.X.c Hydrology and Water Quality. Increase impact to Potentially Significant – The flow trail will alter drainage and concentrate runoff. There will be substantial erosion.

3.10.X.c

Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- i) Result in substantial on-or offsite erosion or siltation;
- ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or offsite;
- iii) Impede or redirect flood flows? d) In flood hazard, tsunami, or seiche zones, risk release

3.11.XI.b Land Use and Planning. Increase impact to Potentially Significant – the Flow Trail contradicts the WCRP Land Use Plan, which stipulates that the wild areas of WCRP are to remain wild.

3.11.XI.b

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Inaccurate – Havey Canyon trail is a narrow, single-track trail in some of the best riparian habitat in WCRP or TRP. Bikes are not permitted on the Havey Canyon trail for 1/4 of the year (December through February). The Havey Canyon trail will suffer serious degradation because it is the only route for users of the Flow Trail to attempt repeat runs.

Mountain bikes are permitted on all other fire roads in Wildcat Canyon, as well as Havey Canyon Trail, which is a wide single-track.

Inaccurate – The Flow Trail is significant reversal of the WCRP Land Use Plan

Therefore, the project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation. This impact would be less than significant.

3.15.XV.a Public Services. Increase to potentially significant. The use of the Flow Trail will impact police and fire protection serviced due to the absence of supervision of the large number of users. EBRPD needs to think about the other major recreation features in TRP and the need for supervision.

3.15.XV.a

Public Services.

Would the project:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant

environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

- b) Fire protection?
- c) Police protection?
- d) Other public facilities?

3.16. xvi.a, b Recreation. Increase to potentially significant – the Flow Trail will increase usage of parking at Rifle Range Road, Alvarado and the Tilden Nature Area. The Flow Trail will need on-site toilets, waste removal and drinking water where there now is none.

3.16. xvi.a, b

Recreation.

Would the project:

- a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

Inaccurate – The Flow Trail project is far more than a “one-directional mountain bike trail.” The Flow Trail is just one part of what will be a much larger route beginning with users arriving by car, riding to the Flow Trail on existing trails and riding up hill on existing trails for repeat rides. Parking at trail heads will be impacted. Existing trails will be impacted. Given the large number of users, there will need to be toilets, waste management and drinking water at the Flow Trail where now there are none.

The project includes improving existing recreational opportunities in Wildcat Canyon Regional Park by adding a one-directional mountain bike only trail. The potential environmental effects of implementing the trail and recreation features are evaluated within this environmental document which determined that, with application of the mitigation measures identified herein, no significant environmental impacts would occur.

3.19.XIX.a-d Utilities and Service Systems. Increase to Potentially Significant – the Flow Trail will attract many users and they will need toilets and drinking water. There is no consideration of this point in the document.

3.19.XIX.a-d

Utilities and Service Systems.

Would the project:

- a) Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or

telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

b) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has inadequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Inaccurate – The number of users at the Flow Trail, which 1.8 to 3.6 miles from WCRP or TRP toilets will require new toilets. Imagine 100 student mountain bikers at the Flow Trail with no toilets. Imagine 200 to 700 student mountain bikers at a NICA event.

The project does not propose the construction of new restrooms or other uses that would generate wastewater. Wildcat Canyon Regional Park is served by existing restroom facilities located in various areas of the regional park. These existing restroom facilities would service the project. The project would result in an increase in visitation to Wildcat Canyon Regional Park. As such, the project would increase wastewater generation compared to existing conditions. However, restroom facilities would be used periodically by riders and a substantial increase in wastewater would not occur. Therefore, the project would not result in a determination by the wastewater treatment provider that it is unable to serve the project's projected demand, and impacts would be less than significant.

Inaccurate – The number of users at the Flow Trail, which 1.8 to 3.6 miles from WCRP or TRP trashcans will require solid waste management at the Flow Trail. Imagine 100 student mountain bikers at the Flow Trail with no trashcans. Imagine 200 to 700 student mountain bikers at a NICA event.

During operation, the number of visitors to Wildcat Canyon Regional Park would increase over existing conditions with implementation of the project. Therefore, the project would increase solid waste generation compared to existing conditions. Trash generated by recreational users would typically consist of food and beverage waste, which would not change with the project. Given the ample existing capacity of the Keller Canyon Landfill, the limited amount of solid waste that would be generated during construction, and the fact that minimal solid waste generation would occur from an increase in trail users, the project would not generate solid waste in excess of local standards or capacity of local infrastructure or otherwise

3.20.XX Wildfire. Increase to Potentially Significant – Mountain eBikes, which will be allowed on the Flow Trail, have lithium batteries that pose a fire risk. The grassy slopes of WCRP can burn. If windy, the fire could spread to East Bay neighborhoods and cities.

3.20.XX Wildfire

Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones? If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c) Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Inaccurate –eBikes have lithium batteries containing energy equivalent to gallons of gasoline. Airlines prohibit storage of lithium batteries in checked luggage for a reason.

The project area is not within a designated FHSZ (CAL FIRE 2024b). However, the project site is in an area that consists of grassland habitats, which are susceptible to wildfire (Heady 1972). EBRPD actively manages wildfire risk through fuels management treatment including hazardous fuel removal and tree thinning. The EBRPD Fuels Management Plan outlines strategies for forest thinning; reducing vegetation with cattle, goat, and sheep grazing; removing hazardous trees; and clearing underbrush (EBRPD 2024). These treatments to reduce wildfire risk would be implemented for the project. In addition, smoking is prohibited within Wildcat Canyon Regional Park at all times pursuant to EBRPD regulations, and all internal combustion equipment used in the project area for construction would be equipped with federal-or state-approved spark arrestors pursuant to PRC 4442, which would minimize accidental wildfire ignitions. Therefore, impacts would be less than significant.