



March 13, 2026

Suzanne Wilson, Senior Planner  
East Bay Regional Park District  
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Oakland, CA 94605  
[trailsdev@ebparks.org](mailto:trailsdev@ebparks.org)

RE: Scoping Comments for the proposed Wildcat Canyon Regional Park Bike Trail Project

Dear Suzanne Wilson,

Thank you for the opportunity to provide comments on the scoping phase of the CEQA environmental review process for the proposed Wildcat Canyon Regional Park Bike Trail Project (NOP issued January 15, 2026). Additionally, we would like to express our gratitude for the extended timeline for this public comment period.

Golden Gate Bird Alliance (formerly Golden Gate Audubon) is a non-profit organization whose mission is to inspire people to protect Bay Area birds and our shared natural environment. For over 100 years we have been a leader in bird conservation and habitat protection. We envision a world where birds, wildlife, and all people flourish together.

The project area includes several sensitive natural plant communities, as outlined in section 5.1.2 of the Biological Assessment prepared for EBRPD by Nomad Ecology, updated January 2026. Additionally, the grassland ecosystem provides critical, and increasingly rare, habitat for many bird species as grasslands have been converted for agriculture and development over the centuries more than many other ecosystem types. Special attention is needed to save this critical habitat and the birds that rely on it, as acknowledged in the 2022 EBRPD NatureCheck report.

Our recommendations for the scope and content of the EIR are outlined in detail below. Overall we believe that the scope of the project area outlined in the NOP and the project description is insufficient to assess the environmental impacts of the proposed bike trail and should be increased to include adjacent trails, ask that you consider the general impacts of new trails including their cumulative impacts, outline all potential mitigative measures, consider how impacts are worsened with various increased trail use scenarios, and consider alternatives including no trail.

As recognized in the EBRPD Biological Assessment, Grasshopper Sparrow, a CDFW Species of Special Concern, are confirmed to be breeding in the project area. Additionally, in the breeding bird study we conducted in 2024 and 2025, Olive-sided Flycatcher and Purple Martin, both Species of Special Concern, were observed in the area and found to be possibly breeding. The EIR should consider the impacts to these confirmed and possible breeding Species of Special Concern. Additionally, Golden Eagles are regularly observed in Wildcat Canyon, especially in winter. The park is suitable breeding habitat for this species and impacts to their prey, a critical component of their habitat, should be considered.

## **Insufficient Scope of the Project Area and Increased Trail Usage**

Because there is no parking area near the proposed trail, it is clear that riders will be using other existing trails to access the new trail. As is typical with a downward flow trail, riders will likely be riding down, back up, and down the trail multiple times per day. The current description of the project focuses on the narrow impacts directly adjacent to the proposed flow trail, but actual impacts will cover a much larger area, including trails that are used to access the proposed trail. The NOP outlines that bikes would no longer be permitted on the adjacent Leonard's Trail, which is a good step toward minimizing additional impacts. However, because of the steep incline and exposure of the Mezue Trail, it's likely riders will use the nearby Havey Canyon Trail to ride back up to access the new trail. There are existing riparian wetlands adjacent to the Havey Canyon Trail with specific protections as state jurisdictional wetlands. These areas and other connected trails will be impacted by the new trail. These adjacent and connected trails are part of the overall project and should be added to the scope of the EIR.

While the NOP outlines "the overall number of visitors to Wildcat Canyon Regional Park would only increase modestly with implementation of the project," it also recognizes that ridership would be concentrated in the area of the new trail. Due to the increased popularity of Mountain Biking as described in the project description, it's more likely that the new trail will have a significant increase in the number of riders on the new trail, connecting trails, and adjacent trails such as Havey Canyon Trail. Because the new trail will likely have this impact of increased traffic of adjacent trails, and increased bike traffic has more impacts to wildlife and the environment more broadly, the scope of the EIR should include those adjacent trails.

Additionally, the EIR should consider various increased trail use scenarios. We believe it is feasible to predict increased trail usage based on other similar flow trails recently built in the Bay Area and beyond. The general impacts of trails, listed below, are worsened and compounded with increased use of the trails and understanding the environmental impacts of the new trail will have to consider increased volume of ridership on both the new trail and connecting and adjacent trails.

## **General Impacts of Trails**

All new trails have environmental impacts which should be considered in the review process. Additionally, cumulative effects of these impacts should be studied and included in the EIR. We ask EBRPD to study the following general impacts of the Wildcat Canyon bike trail project, their cumulative impacts, as well as outline mitigation opportunities of all potential impacts on:

- Soil erosion and landslide potential
- Drainage patterns and their impacts on slope stability
- Soil compaction
- Nutrient leaching and downslope transfer of nutrients
- Altered soil microbiology
- Impacts to plants and plant communities
- Reduced bird species diversity and nesting success near actively used trails
- Potential for increased predation of bird species and nest predation due to raptor perching opportunity from the added fencing
- Impacts to Golden Eagle prey species during construction and implementation.
- Direct disturbance to birds especially during the breeding season

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- Potential for increased spread of invasive species and pathogens. Bike trails, more so than hiking trails, serve as conduits for invasive species and provide access for invasive plants and pathogens from adjacent urban areas to natural areas such as Wildcat Canyon.

### **Study of Alternatives**

The EIR must describe a range of reasonable alternatives to the project, or to its location, that would feasibly attain most of the basic objectives of the project and avoid or substantially lessen any of the significant effects of the project. As the project proponents, EBRPD should identify and study in the EIR alternatives that meet the requirements of CEQA, including a no trail alternative. Section 15126.6(e)(2) of the CEQA statute requires that the EIR identify an "environmentally superior alternative" from among the range of alternatives.

We recognize the EBRPD as excellent stewards of the incredible biodiversity we have here in the East Bay. Thank you for the opportunity to comment on this project. Please contact me if you have any questions or if we can provide any additional information.

Thank you,

A handwritten signature in blue ink that reads "Glenn Phillips". The signature is written in a cursive, flowing style.

Glenn Phillips  
Executive Director