



Highway City Community Development
Teague Community Resource Center
4718 N. Polk Ave, Fresno CA 93722
March 2, 2026

June 12, 2026

San Joaquin River Conservancy Board of Directors
11605 Old Friant Road
Fresno, CA 93730

RE: Comments on the 2026 Draft Strategic Plan

Dear Ms. Daniska:

On behalf of Highway City Community Development, I appreciate the opportunity to comment on the San Joaquin River Conservancy's 2026 Draft Strategic Plan.

Highway City Community Development serves communities located in close proximity to the San Joaquin River and has long advocated for increased access to parks, open space, recreation, and environmental amenities for residents of west and northwest Fresno. We support the Conservancy's mission and commend the agency for undertaking a strategic planning process that seeks to guide the development of the San Joaquin River Parkway over the coming years.

We particularly support the Draft Strategic Plan's emphasis on expanding public access, increasing community engagement, and ensuring that the benefits of the Parkway are available to all residents. However, we respectfully request that the Conservancy address two significant issues with the current iteration of the plan.

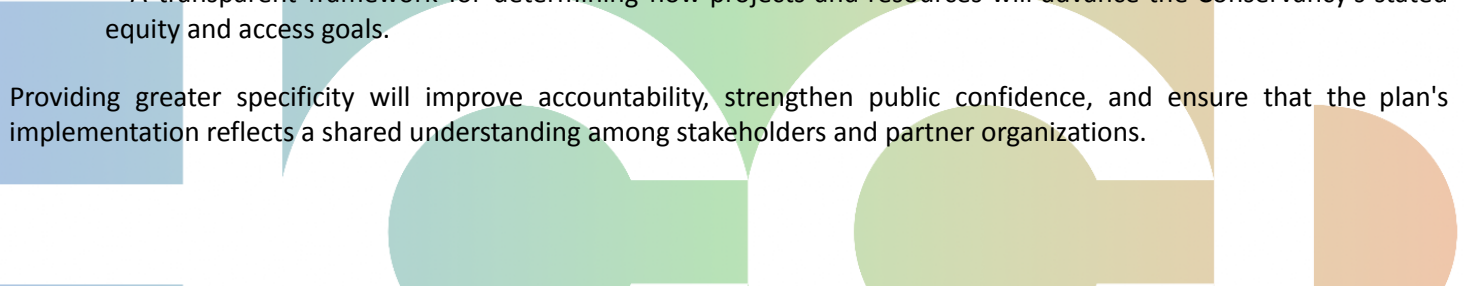
First, the Draft Strategic Plan relies heavily on terms such as "equitable public access," "underserved communities," "historically underserved populations," and similar concepts without providing definitions or measurable criteria. These concepts appear throughout the plan and are central to Goal 5, which calls for accelerating Parkway development and expanding equitable public access.

We support the intent behind these objectives. However, without clearly defining these terms, it is difficult for stakeholders to understand how priorities will be established, how investments will be directed, and how success will be measured. "Access" may refer to geographic proximity, trail connectivity, transportation options, affordability, physical accessibility, programming, or other factors. Similarly, "underserved communities" may be defined using socioeconomic, demographic, geographic, environmental justice, or other criteria.

We therefore recommend that the final Strategic Plan include:

- Clear definitions of key terms related to access and equity;
- Objective criteria for identifying underserved communities and prioritizing investments;
- Measurable performance metrics that allow the public to evaluate progress; and
- A transparent framework for determining how projects and resources will advance the Conservancy's stated equity and access goals.

Providing greater specificity will improve accountability, strengthen public confidence, and ensure that the plan's implementation reflects a shared understanding among stakeholders and partner organizations.





Second, we are concerned that the Draft Strategic Plan appears to contain no references to either the Western Reaches Access Activation Plan or Camp Pashayan.

This omission is particularly noteworthy because the Western Reaches Access Activation Plan directly advances many of the goals articulated in the Draft Strategic Plan. The plan was developed through extensive community engagement and was specifically designed to expand access to the San Joaquin River Parkway for residents who have historically been disconnected from the river and its recreational opportunities. The Western Reaches effort focuses on approximately four miles of the Parkway between Highway 99 and Milburn Overlook and identifies opportunities to reactivate Camp Pashayan, improve river access, extend trail connections, and create welcoming recreational amenities for residents of Fresno and Madera Counties.

The Western Reaches planning effort reflects years of community advocacy and stakeholder engagement centered on the concept of a "River for All." Its purpose is not only to improve physical access to the river but also to ensure that access is meaningful, culturally relevant, and responsive to the needs of communities that have traditionally been underrepresented in Parkway planning and investment decisions.

Likewise, Camp Pashayan represents one of the most significant opportunities to expand public access within the Parkway. Camp Pashayan has the potential to serve as a major gateway to the river for residents who currently face barriers to accessing the river and other more developed segments of the Parkway. The Western Reaches planning process identified opportunities for recreational facilities, environmental education, river access improvements, trail connections, and community-serving amenities that would help fulfill the Conservancy's goals related to recreation, public engagement, and equitable access.

Given the Conservancy's emphasis on expanding access and serving historically underserved populations, it is difficult to reconcile the omission of these initiatives from the Draft Strategic Plan. Given the fact that the Draft Strategic Plan goes so far as to discuss the possibility of extending the SJRP's boundaries as far north as Modesto, the silence about Western Reaches and Camp Pashayan raises fears that these initiatives are at risk of being forgotten.

We respectfully request that the final Strategic Plan explicitly acknowledge the Western Reaches Access Activation Plan and Camp Pashayan as priority initiatives that support implementation of the Conservancy's long-term vision. One possible way of doing this could be adding an implementation strategy under Goal 5 directing the Conservancy to evaluate and pursue implementation of recommendations contained in the Western Reaches Access Activation Plan, including activation of Camp Pashayan and trail connectivity improvements between Highway 99 and Milburn Overlook. Doing so would recognize the substantial community planning work already completed, provide continuity between existing planning efforts and future implementation, and demonstrate a commitment to ensuring that Parkway investments benefit communities throughout the Conservancy's service area.

Thank you for considering these comments. Highway City Community Development looks forward to continued collaboration with the Conservancy and its partners to expand recreational opportunities, improve community access to open space, and advance the shared vision of a San Joaquin River Parkway that serves all residents of the region.

Sincerely,

Daniel Brannick
Board Member
Highway City Community Development



June 12, 2026

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Armen DevejianKari Daniska and Team
San Joaquin River Conservancy**Re: Comment on the San Joaquin River Conservancy Draft Strategic Plan**

Dear Kari and Team,

Thank you for preparing the draft strategic plan for the San Joaquin River Conservancy (SJRC). The plan reflects important work and a genuine commitment to the river and its surrounding communities. After careful review, we offer the following comments and suggestions in the spirit of strengthening the plan's clarity, inclusivity, and achievability.

General Document Structure

The document would benefit from the addition of page numbers throughout, which would make it significantly easier to reference specific sections in written or verbal communications.

The plan currently includes one map (p. 7) illustrating ownership across different agencies and referencing sections 1–5, but those sections are not labeled on the map itself. We recommend the following map improvements:

- Include private property parcels and their zoning designations to give a fuller picture of the landscape context.
- Add a second map showing SJRC-owned properties with their current names, a brief description of each, and the status of public access (open, restricted, planned, etc.).

The plan describes an ambitious range of activities — marketing, planning, community outreach, education, restoration, grant writing, agency collaboration, and adaptive property management — yet does not address how the agency intends to advance all of these goals given current staffing levels, nor does it outline any plans for future staff additions. We strongly encourage the plan to include a staffing strategy or at minimum acknowledge this implementation challenge explicitly.

Goal 1: Strengthen Tribal Partnerships and Advance Equity in Land Stewardship

The Circle V property — home to culturally significant plants including a majestic oak grove and a sedge bed used by basketweavers — represents the most substantial effort the SJRC has made to date in advancing this goal. Despite its significance, Circle V appears only once in the document, in parentheses. We recommend naming and discussing Circle V prominently in this section, as it provides a concrete and meaningful example of the conservancy's work.

The strategic plan does not distinguish between federally recognized and non-federally recognized tribes, an important distinction in our region. Our experience with community outreach for the Circle V project revealed that many individuals affiliated with non-federally recognized tribes rely on the river for access to ancestral lands and

cultural practices. These groups must be explicitly acknowledged and included in the plan's tribal engagement strategies.

Strategy 5, 'Promote Cultural and Education,' references collaboration with 'tribes' but omits broader Native American and Indigenous groups and individuals. References to Traditional Ecological Knowledge (TEK) should also acknowledge intertribal organizations and nonprofit partners that support this work — not only formally recognized tribes. We recommend revising this language to reflect the full diversity of Indigenous stakeholders connected to the river.

Goal 2: Advance Land Acquisition — Strategy 4: Advance Equity and Community Benefits

The current language calls for ensuring that acquisitions support equitable access to nature, 'especially in underserved areas of the San Joaquin River Parkway.' This framing is too narrow. Many underserved community members do not live adjacent to the river but rely on it as their primary access to outdoor and natural spaces. Framing equity solely around proximity to the Parkway dismisses these residents.

We encourage the conservancy to clarify its understanding of the stakeholder communities of the San Joaquin River Parkway — that is, which communities does SJRC recognize as the primary beneficiaries of and stakeholders in the Parkway? This question should be answered explicitly in the plan and should inform all equity-related strategies.

Goal 4: Expand Equitable Public Access While Protecting Natural and Cultural Resources

The plan does not include an inventory of existing access points, current property statuses, or project prioritization beyond a brief reference to the Board's priority of River West. Including this baseline information would strengthen the plan and allow for meaningful progress tracking over time. We recommend adding a summary of existing and planned access points and the current status of ongoing projects.

The Year 1 implementation language calls for mapping 'underserved and disadvantaged, severely disadvantaged, and vulnerable communities near the San Joaquin River Parkway.' The word 'near' requires clarification. Does it mean adjacent blocks, a specific mileage radius, neighboring census tracts, or something else? The ambiguity matters because:

- Neighborhoods immediately adjacent to the river are, in many cases, among the more affluent neighborhoods in Fresno and Madera counties.
- The majority of disadvantaged residents who visit the river travel from communities at a greater distance. Limiting the scope to those who live 'near' the river risks excluding the communities this goal is intended to serve.

We recommend either defining 'near' with specificity or replacing it with broader geographic framing that reflects where disadvantaged visitors to the river actually live.

The Year 3 implementation targets the construction of additional access points in disadvantaged communities and includes design work in the same year. This timeline is not realistic given typical environmental review, permitting, and community engagement requirements. We recommend separating design and construction into distinct phases across the implementation timeline.

Goal 5: Align Investments, Partnerships, and Planning Efforts

Strategy 3, 'Enhance Visitor Amenities,' does not mention water-based recreation activities such as swimming, canoeing, or fishing. These are historically significant uses of the San Joaquin River, represent low-impact and widely accessible forms of recreation, have been mentioned by the community during the extensive outreach process for the Western Reaches project led by Building Healthy Communities, and are directly relevant to equitable access goals. We recommend explicitly including water recreation in this strategy.

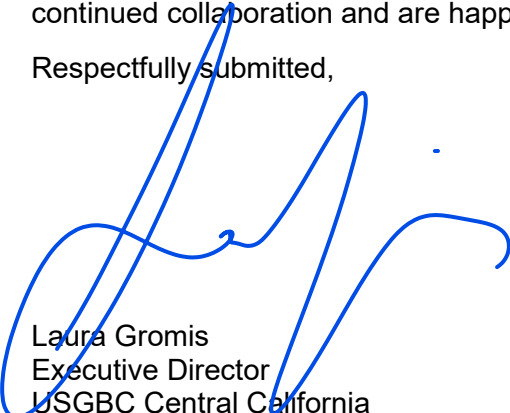
Goal 5 proposes creating or designating a specific nonprofit organization to support philanthropy, community engagement, and programming for the Parkway. We have significant concerns about this approach:

- The San Joaquin River Parkway Trust (the Parkway) already performs precisely these functions and has deep institutional knowledge, established relationships, and an ongoing presence at the river. Any process that does not center this organization risks duplicating effort and overlooking an invaluable existing resource.
- Creating a new nonprofit organization requires substantial time, legal and administrative infrastructure, and financial resources — all of which would divert capacity from the conservancy's core work at a time when those resources are already stretched.
- The rest of the plan appropriately emphasizes collaboration with a wide range of organizations. Rather than designating a single organization to serve as a shadow programming entity across all of SJRC's areas of work, we recommend instead building collaborative relationships with multiple organizations from our community — including the Parkway Trust — to build on and strengthen already existing capacities.

Closing

We appreciate the conservancy's efforts and the opportunity to provide input on this plan. The San Joaquin River is a vital resource for communities across Fresno and Madera counties, and a well-constructed strategic plan will help ensure it remains accessible, healthy, and equitably managed for generations to come. We look forward to continued collaboration and are happy to discuss any of these comments in further detail.

Respectfully submitted,



Laura Gromis
Executive Director
USGBC Central California

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June 12, 2026

San Joaquin River Conservancy

Attention: Strategic Plan Comments

Submitted by electronic mail to: info@sjrc.ca.gov and kari.daniska@sjrc.ca.gov

Re: Comments on San Joaquin River Conservancy Strategic Plan 2026 to 2030

Dear Executive Officer Daniska and Members of the Conservancy Board,

On behalf of the San Joaquin River Parkway and Conservation Trust (Parkway), thank you for the opportunity to comment on the San Joaquin River Conservancy's Draft 2026-2030 Strategic Plan. We commend the Conservancy staff and Governing Board, as well as the many community members and partners who have been part of this planning process. As a partner organization with more than three decades of shared history in implementing and managing the parkway, we offer the following comments in a spirit of collaboration with a shared commitment to the parkway's long-term success.

Our comments focus on three primary themes: the critical and largely unacknowledged role of nonprofit partners in advancing the Conservancy's land acquisition, restoration, and public access goals; the value of building upon existing regional science, restoration plans, and partnerships rather than recreating work already completed; and opportunities to streamline the plan by reducing repetition and sharpening implementation strategies to better reflect the Conservancy's collaborative role in stewarding the parkway.

General Comments

In *Figure 1: San Joaquin River Parkway Lands in Public Ownership and Existing Trail System* the Riverside segment of the Lewis S. Eaton Trail was omitted. Additionally, the Eaton Trail segment along Friant Road should be corrected to end at Friant and Audubon.

A *State Leadership Accountability Act (SLAA) Annual Plan and Report* is referenced in the "Preparing the Strategic Plan" section. The *SLAA Annual Plan and Report* does not appear to be posted on the Conservancy's website. Parkway would appreciate information about how our organization and the public can receive copies of these reports.

Goal 1

Parkway appreciates the Conservancy's commitment to strengthening relationships with Native communities as articulated in Goal 1. We encourage the Conservancy to consider clarifying in the final plan how it intends to engage with Indigenous community members beyond the formal government-to-government consultation process required by state law. As currently written, Goal 1 primarily describes the Conservancy's obligations and strategies in relation to recognized tribal governments, almost exclusively using "tribal" and "tribes," which may suggest that Native community engagement is limited to those formal channels. This is particularly important in our region, where many Native peoples without federal recognition maintain deep cultural and ancestral ties to the San Joaquin River corridor and have important contributions to make.

We understand that the Conservancy has engaged and intends to continue engaging more broadly with Native community members outside of the legally required consultation. Making this explicit in the plan would strengthen Goal 1 and would better reflect the Conservancy's full vision for inclusive and culturally connected stewardship of the San Joaquin River corridor.

Goal 2

Parkway asks the Conservancy to expand Goal 2 to include how land acquisitions can be implemented successfully in partnership with local and statewide nonprofit organizations. As currently written, this goal does not address the acquisition and fundraising capacity that nonprofit land trusts bring to conservation work. There are three accredited land trusts in the region, and approximately half of the land acquired for the parkway to date has been acquired in partnership with the land trust community. Land trusts bring significant technical expertise in due diligence, appraisals, title work, and long-term stewardship, capacities that directly complement the Conservancy's mission and could meaningfully accelerate progress towards the Conservancy's acquisition goals.

Our organization supports the Conservancy's stated intention to evaluate expanding its geographic boundary downstream to Modesto, potentially encompassing the Merced, Tuolumne, and Stanislaus tributaries. We encourage the Conservancy to pursue this expansion actively and to prioritize the legislative work needed to make it possible. The San Joaquin River is one of our state's most significant waterways, and expanding the Conservancy's jurisdiction would better reflect its full ecological and recreational importance and would be consistent with peer conservancies in scale and impact.

Strategy 3: Leverage Funding and Partnerships appropriately identifies nonprofit partners alongside the WCB, local governments, and other public agencies as key collaborators in land acquisition. As currently written, nonprofit partnership is not carried forward into the Implementation Timeline for this goal. Each of the yearly milestones under Leverage Funding and Partnerships focuses exclusively on government agencies and grant programs, with no mention of nonprofit coordination. We urge the Conservancy to explicitly include nonprofit partnerships in each year of the Implementation Timeline.

We offer two additional observations on Goal 2. First, under Advance Equity and Community Benefits, the plan makes meaningful commitment to incorporating community input into acquisition priorities. We encourage the plan to include more specific details as to how community engagement will be structured and how input will be reflected in acquisition decisions. Second, long-term stewardship capacity is consistently presented as a final consideration rather than an upfront acquisition planning issue. We encourage the Conservancy to address stewardship capacity early in the acquisition process, specifically, whether the Conservancy or its acquisition partner can responsibly operate and maintain the site so that it is a benefit rather than a detriment to the community.

Goal 3

Parkway encourages the Conservancy to revisit Strategy 1 of Goal 3 with a focus on leveraging the substantial body of restoration planning work already completed by regional and statewide partners. The San Joaquin River Restoration Program and its implementing agencies have been identifying, assessing, and prioritizing restoration opportunities within this reach since at least 2003, producing extensive ecological data, habitat assessments, and prioritization frameworks that could directly serve the Conservancy's restoration goal. Rather than developing new ecological assessment protocols, we urge adoption and alignment with the current best practices and existing data already developed. This would reduce unnecessary duplication of effort, streamline this plan, and better reflect the Conservancy's role as a collaborative partner within a well-established regional restoration effort.

Goal 3 would also benefit from streamlining several of its implementation strategies. Strategy 2's commitment to "support research and data collection to inform restoration techniques and evaluate outcomes" is essentially a description of adaptive management, which should be assumed as a baseline for any restoration plan. Strategy 3, which addresses collaborative partnerships, could similarly be condensed to a single sentence without losing its intent. The current structure of a sentence followed by three bullets that largely restate the same point is repetitive. Finally, rather than restating nature-based solutions principles at length in Strategy 5, we suggest that the Conservancy simply align its approach with California Natural and Working Lands Climate Smart Strategy and CNRA's established statewide framework for nature-based climate solutions, which already provides the guidance and priorities the strategy is attempting to articulate.

The bullet points under Year 1 of the Implementation Timeline suggest the Conservancy intends to conduct ecological assessments and mapping work that has largely already been completed by the San Joaquin River Restoration Program and other regional partners. We encourage the Conservancy to reframe this section around leveraging existing work rather than recreating it, such as by surveying existing restoration plans to identify opportunities for projects aligned with broader regional habitat restoration goals. Similarly, rather than developing new habitat maps, we suggest the Conservancy build on more than 25 years of GIS work already completed through the SJRRP and other regional restoration

efforts. Parkway would welcome the opportunity to collaborate with the Conservancy on assembling a GIS framework that integrates existing plans overlying the parkway.

We offer several additional observations on the implementation timeline. Under Monitor, Evaluate, and Adapt in Year 1, rather than developing new protocols, performance metrics, and data management systems independently, we encourage the Conservancy to adopt current best practices already in use and to utilize existing statewide platforms such as the California Natural Diversity Database, the State Geoportal, or data management systems currently in use by CNRA or CDFW. Under Year 2, the suggestion to “adopt formal roles and responsibilities” among partners reflects a more transactional approach. We suggest replacing this with language that emphasizes working collaboratively with partners who bring overlapping goals and complementary expertise. More broadly, this implementation section would benefit from reframing throughout to reflect the Conservancy’s role as a partner building upon decades of existing collaborative restoration work on the parkway, rather than an agency starting from scratch.

As a general observation, Goal 3, and the plan overall, would be strengthened by reducing repetition between strategy sections and the implementation timelines. The Wildlife Conservation Board’s 2025-2030 Strategic Plan offers a useful model for a concise, outcome-focused strategic plan.

Goal 4

Goal 4 articulates an ambitious vision for equitable public access that Parkway strongly supports. However, the strategies and implementation timeline as written suggest the Conservancy will be leading this work largely independently, developing new programs, infrastructure, and community relationships from the ground up. Effective management of Conservancy lands and meaningful expansion of equitable public access will only succeed through the sustained, joint efforts of many community partners, including public agencies, nonprofits, and community groups that have a proven track record of implementing and managing successful programs on the parkway. We ask the Conservancy to reframe Goal 4 around deepening and leveraging work with existing partners who have already demonstrated the capacity and commitment to serve the parkway and local communities.

The access equity assessment described in Strategy 1 could draw directly on existing statewide tools. The State Parks Community Fact Finder and CalEnviroScreen data already provide demographic and geographic data needed to identify disadvantaged communities and prioritize access investments and would provide a strong foundation for the Conservancy’s equity planning work.

Strategy 7 addresses visitor safety, and we appreciate that the plan identifies community rangers, volunteer trail stewards, and seasonal staff alongside law enforcement. We ask the Conservancy to ensure that community-based stewardship is treated as a primary strategy rather than a supplement to law enforcement. A visitor safety approach centered

on a welcoming, community-based presence, with law enforcement as a backstop rather than first response, would better align with the equity commitments articulated throughout Goal 4. Partnering with organizations that have demonstrated capacity to responsibly manage and program public lands would accelerate this work considerably and make the equity commitments in Goal 4 more achievable.

Goal 5

We support the direction of Goal 5 and offer two comments for your consideration.

First, Strategy 4, which addresses habitat restoration, is essentially a restatement of the strategies that are already addressed in Goals 3 and 4. Removing or substantially condensing this strategy would make the plan more concise.

Second, the repeated references to designating or creating an official nonprofit partner warrants careful consideration. The San Joaquin River Parkway has been shaped over more than three decades through the sustained collaboration of many nonprofit partners including but not limited to Parkway, RiverTree Volunteers, Trust for Public Land, River Partners, Fresno BHC, Sequoia Riverlands Trust, the Central Valley Community Foundation, the US Green Building Council, Advocates for Indigenous California Language Survival, the Fresno American Indian Health Project, among others. These organizations are already actively engaged in securing private funding, cultivating volunteerism, and advancing educational and recreational programs. Designating a single official nonprofit partner risks alienating this established community of collaborators and may be unnecessary given the depth of existing nonprofit capacity. We respectfully ask the Conservancy to consider whether its stated goals in this area could be better achieved by deepening collaboration with the many partners already doing this work.

Goal 6

Parkway is supportive of Goal 6 and appreciates the Conservancy's commitment to adaptive management and science-based stewardship. The collaborative framing throughout this goal, emphasizing partnerships with state agencies, tribal governments, academic institutions, and nonprofit organizations, reflects an appropriate and realistic approach consistent with the Conservancy's mission.

We have one comment regarding Strategy 2: the emphasis on developing new standardized monitoring protocols and establishing baseline ecological data would benefit from first surveying the extensive ecological data and monitoring frameworks already developed by the SJRRP and other regional partners for this reach, which could provide a strong foundation for the Conservancy's monitoring efforts.

Goal 7

Parkway supports Goal 7 and encourages the Conservancy to pursue its funding diversification strategies, particularly the redirection of State Lands Commission lease revenues to support operations along the parkway.

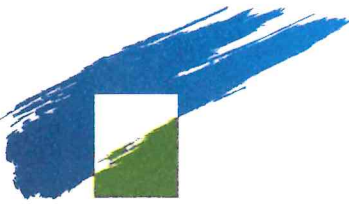
As the Conservancy works to diversify its funding base, we suggest that you draw on the fundraising expertise, donor relationships, and philanthropic experience that your nonprofit partners have developed in support of the parkway. These organizations are actively engaged in private funding for conservation, restoration, and public access work aligned directly with the Conservancy's mission and represent a resource for collaborative funding efforts.

Thank you again for the opportunity to comment on the Draft Strategic Plan. Parkway looks forward to continued collaboration with the Conservancy in support of our shared long-term conservation and public access goals for the parkway.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Sarah Parkes", with a stylized, flowing script.

Sarah Parkes
Assistant Director



San Joaquin River
Parkway and
Conservation Trust, Inc.

August 22, 2025

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Kari Kyler Daniska, Executive Officer
San Joaquin River Conservancy
PO Box 28338
Fresno, CA 93729

Dear Kari,

The San Joaquin River Parkway & Conservation Trust, Inc. (Trust) appreciates the opportunity to provide feedback on the San Joaquin River Conservancy's Fee Collection Policy and Fee Schedule draft. With many years of experience operating Parkway properties and hosting community events, the Trust encourages policies that support public access rather than creating barriers.

Our initial concerns about adding fees to Conservancy properties in general are based on the fact that fees create unnecessary obstacles to access. A fee-based approach may discourage visitors from entering the site and instead displace parking onto neighboring properties and streets, creating a nuisance for neighbors. To ensure transparency and public trust, it would be helpful for the Conservancy to provide a clear budget or outline showing how fee revenue will be directly reinvested into the properties themselves, through restoration, maintenance, visitor improvements, and increased public access.

As for the draft itself, one initial concern relates to the removal of cash as a payment option. In 2024, the Trust collected nearly equal amounts in cash and credit card transactions at Conservancy properties. Many visitors, particularly at Sycamore Island, rely on cash, and eliminating this option may unintentionally discourage visitation for those without credit cards or checkbooks. Because cashier's checks and money orders carry bank fees that often equal or exceed the cost of the proposed Day Use Fees,



CREATING AND PROTECTING THE SAN JOAQUIN RIVER PARKWAY

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promoting those methods could discourage people from visiting and create an additional cost to access.

The draft also states that “there is no dedicated operations and maintenance funding,” which may be misleading given the existence of Measure P funds, general funds garnered by Assemblymember Joaquin Arambula, and the River Parkway Trust’s O&M Endowment, all of which are dedicated to supporting Parkway properties. In that same section, a reference is made to “peak demand pricing at high-demand properties or facilities.” Since this concept is not addressed elsewhere in the document, additional clarification would be helpful.

Questions also arise regarding the proposed electronic pay stations. We appreciate the convenience provided by electronic pay stations but wonder how ongoing maintenance will be funded. Considering the history of vandalism in the region, it would be helpful to understand the staffing and security plan for the equipment.

The second paragraph in the Fees and Charges section discusses a larger action plan related to revenue generation, not specific to fees. This section may be a better fit for the Purpose section of the document.

The proposed Day Use Fees deserve careful consideration and research. Introducing new fees during the weekdays at properties like Sycamore Island could reduce weekday visitation, which is already lower on weekdays than weekends, potentially offsetting expected revenue. One option to encourage use would be to allow day passes to be purchased online in advance, which could also drive more visitors to the website and create opportunities for engagement in other areas. This is currently in practice with Trust as operators and has proven effective. Additionally, the proposed fees for buses and RVs could mislead visitors into assuming camping is permitted on Conservancy lands. The \$50 gate opening fee for properties not open to the public could use some clarification on whether this fee is intended to apply to partner agencies or contractors who are working onsite under existing agreements.

With respect to volunteer passes, the process should be as simple as possible for participants who are already giving generously of their time. Distributing passes directly at volunteer events, rather than requiring advance pick-up, would help avoid unnecessary barriers to service.

Annual passes are another area where adjustments to the draft could improve user experience. Currently, the draft policy proposes that passes will only be valid from January 1 through December 31. In order to align more with the practices of National and State Parks, passes should instead be valid for twelve months from the date of

purchase, providing visitors greater value and encouraging year-round use. Offering options for mailing annual passes or purchasing them online would also increase convenience, while providing the ability to purchase or pick up at park properties instead of the Conservancy's Headquarters as alternatives would make passes accessible to a broader range of visitors. The fee attached to the annual pass is higher than Fresno County Parks and National Park passes. We recommend reducing the fee since the Conservancy's lands currently have fewer amenities than those found in State and National Parks. As the Conservancy's lands are improved for public access, an increase in fees would be warranted.

The section on special event permits and fees would benefit from clearer organization and consistent terminology. Currently, fee descriptions are spread across several pages and use different labels, which creates confusion. For example, page 10 refers to a "permit filing fee," while page 11 calls it a "special event filing fee." Standardizing language and presenting the information in a logical sequence would make the policy more understandable to the public.

One approach might be to begin with a definition of what qualifies as a special event and the baseline fees required for those events. The next section could then outline additional applications and fees that apply to certain types of events, then end with the procedure table. As written, fees are difficult to track, and exceptions are scattered throughout the document.

From reviewing the draft, the following fees appear to apply: a \$50 permit filing fee (\$100 if submitted late), a Regular Use Fee that is mentioned but not defined, a minimum of \$200 as a Special Event Activity Fee in addition to the Regular Use Fee, possible Additional Special Event Fees determined at a later date, a Percentage Fee ranging from 10–25% of gross income depending on the organization, and a Damage Deposit with no stated amount or guidelines to follow for a refund. Many of these remain undefined, which leaves applicants uncertain about their financial obligations. Providing clear ranges or fixed amounts for each fee would allow organizations to plan appropriately.

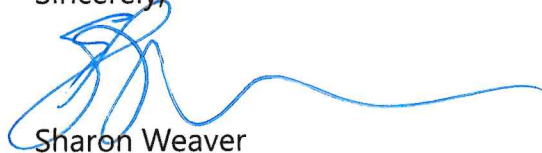
Even with the lowest amount of fees, smaller events would possibly lose money by hosting their event at a Conservancy property, as for larger events, the cost wouldn't be a big factor. A tiered system that scales fees according to event size could make the policy more transparent and equitable by recognizing the impact of a group of 10 participants versus a group of 100.

The current draft also requires that ABC licenses be submitted with the Special Event permit at least 30 days in advance, but the Alcoholic Beverage Control department does

not allow licenses to be requested until within a 30-day timeframe and requires a site map as well as a signature from the owner of the property. With those requirements for a license, a permittee cannot provide an ABC at the time of applying for a Special Event permit with the Conservancy. Adjusting the policy to require proof of licensed servers or the submission of the license before the event would resolve this conflict. It may also be helpful to specify under what conditions security staff would be required, based on event size. Since the two procedure tables are identical except for the ABC license requirement, it may be clearer to consolidate them into a single procedure table and simply add a note stating that ABC documentation must be submitted before the event.

These suggestions are offered in the spirit of partnership, with the goal of helping to develop policies that promote accessibility for the public. We appreciate the opportunity to provide feedback and look forward to continued collaboration on this important work.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Sharon Weaver', with a long, flowing horizontal line extending to the right.

Sharon Weaver
Executive Director