



**OHMVR COMMISSION MEETING  
El Dorado County Board of Supervisors Chambers**

**September 15, 2012**

**STAFF REPORT:** Planning at Carnegie SVRA related to the Alameda/Tesla parcels and recent contacts with East Bay Regional Park District

**STAFF:** Rick Le Flore, State Park Superintendent (RA)

**SUBJECT:** East Bay Regional Park District 2012 Master Plan regarding Tesla Parcel

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**Summary**

In the late 1990s the OHMVR Division purchased two parcels totaling approximately 3,000 acres of land to the west of Carnegie SVRA. The newly acquired lands are contiguous to the existing SVRA and commonly referred to as the “Alameda-Tesla” parcels.

In 2007, the East Bay Regional Park District (EBRPD) was amending its master plan. The amended master plan included a 2007 Master Plan Map that identified the Tesla parcel at Carnegie SVRA as a possible acquisition to add to EBRPD parklands (see Attachment A). At that time, representatives of the OHMVR Division contacted the EBRPD staff to inform them that the Tesla parcel was not available for acquisition and was planned to be added to the Carnegie SVRA (see Attachment B).

**Discussion**

The OHMVR Division is currently in the process of updating the Carnegie SVRA General Plan. In support of the General Plan update, a programmatic Environmental Impact Report (EIR) is being prepared. The General Plan/EIR is necessary to allow development of recreational opportunities in the Alameda-Tesla parcels.

EBRPD manages 65 parks in Contra Costa and Alameda Counties. EBRPD is in the process of updating the Park District’s Master Plan. Information on the Master Plan update can be found on the District’s website at: [www.ebparks.org/planning/mp](http://www.ebparks.org/planning/mp). Contained on the website is a draft 2012 Master Plan Map that once again identifies the Tesla parcel as a potential acquisition to add to EBRPD parklands (see Attachment C).

As part of the Carnegie SVRA General Plan/EIR public outreach efforts, contact was made with representatives of the EBRPD planning staff. On May 11 and 25, 2012, OHMVR Division staff provided tours of the Tesla parcel for EBRPD Board of Directors and staff. On June 11, 2012, EBRPD planning staff submitted a comment letter on the Carnegie SVRA General Plan/EIR Notice of Preparation (see Attachment D).

On July 10, 2012, OHMVR Division staff met with representatives of EBRPD to discuss the Carnegie SVRA General Plan and specifically the Tesla parcel. OHMVR Division staff provided background on the Tesla parcel and communicated to the EBRPD representatives that it was not available for EBRPD acquisition or management. OHMVR Division staff welcomed the EBRPD staff as stakeholders in the Carnegie SVRA General Plan process.

### **Commission Action**

The Commission may:

1. Take no action.
2. Submit a comment letter to EBRPD.

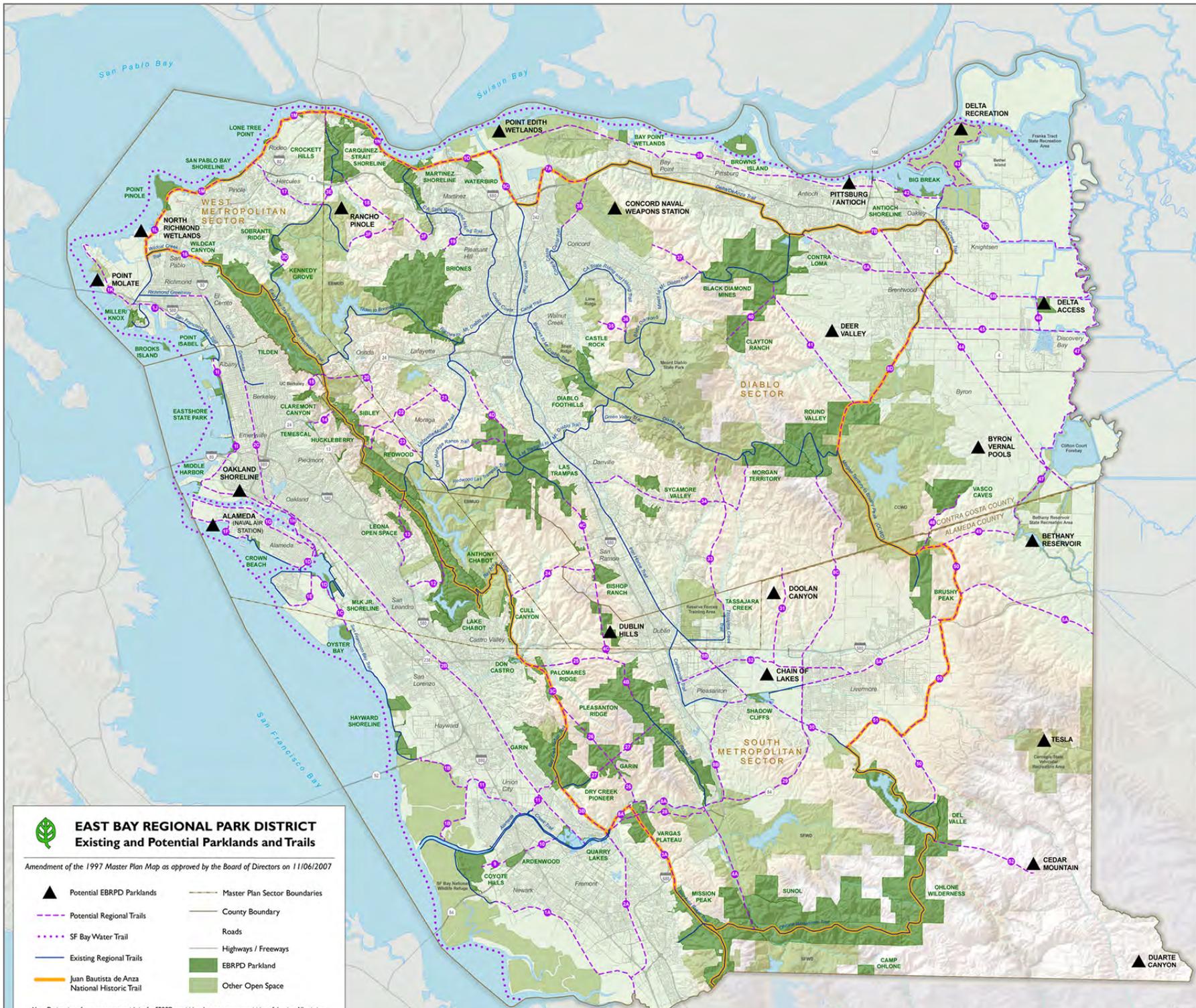
### **Attachments**

Attachment A – 2007 EBRPD Master Plan Map (adopted)

Attachment B – December 19, 2007 OHMVR Letter to EBRPD

Attachment C – 2012 EBRPD Master Plan Map (draft)

Attachment D – June 11, 2012 EBRPD Comment Letter



**EAST BAY REGIONAL PARK DISTRICT**  
Existing and Potential Parklands and Trails

Amendment of the 1997 Master Plan Map as approved by the Board of Directors on 11/06/2007

	Potential EBRPD Parklands		Master Plan Sector Boundaries
	Potential Regional Trails		County Boundary
	SF Bay Water Trail		Roads
	Existing Regional Trails		Highways / Freeways
	Juan Bautista de Anza National Historic Trail		EBRPD Parkland
			Other Open Space

Notes: Designation of an area as a potential site for EBRPD acquisition does not assure acquisition of the site. All existing EBRPD Parklands may be expanded. The map shows all EBRPD land and trails acquired as of Sept. 10, 2007. Locations of potential EBRPD parklands and trails are approximate; some could include several facilities.

- Potential Regional Trails** (or partially completed)
- 1 San Francisco Bay Trail \*\*
  - 2 Santa Clara County to Coyote Hills
  - 3 Coyote Hills to Hayward Shoreline
  - 4 Oyster Bay to Martin Luther King Jr.
  - 5 Martin Luther King Jr. to Crown Beach
  - 6 Bay Farm Loop
  - 7 Crown Beach to Alameda
  - 8 Oakland Estuary
  - 9 Martin Luther King Jr. to Eastshore State Park
  - 10 Eastshore State Park
  - 11 Pt. Isabel to Miller/Knox
  - 12 Miller/Knox to Wildcat Creek
  - 13 Wildcat to Pt. Pinole
  - 14 Pt. Pinole to Carquinez Strait
  - 15 Carquinez Strait to Marinere Shoreline
  - 16 Marinere Shoreline to Pt. Edith
  - 17 East Bay Greenway
  - 18 Santa Clara County to Fremont
  - 19 Union City to Oakland
  - 20 Ohlone Greenway
  - 21 Bay Area Ridge Trail \*\*
  - 22 Mission Peak to Vargas Plateau
  - 23 Vargas Plateau to Garin/Dry Creek Pioneer
  - 24 Garin/Dry Creek Pioneer to Chabot
  - 25 Kennedy Grove to Sobrante Ridge
  - 26 Sobrante Ridge to Carquinez Strait
  - 27 Feeder Trail #1
  - 28 Calaveras Ridge Trail \*\*
  - 29 Sunol to Pleasanton Ridge
  - 30 Pleasanton Ridge
  - 31 Pleasanton Ridge to Las Trampas
  - 32 Las Trampas to Briones
  - 33 Iron Horse Trail \*\*
  - 34 San Joaquin County to Shadow Cliffs
  - 35 Shadow Cliffs to Alameda County
  - 36 Walnut Creek Channel Extension
  - 37 Mokelumne Coast to Crest Trail\*\*
  - 38 Contra Loma to Marsh Creek Trail
  - 39 Marsh Creek Trail to Delta
  - 40 Delta/DeAnza Trail \*\*
  - 41 Walnut Creek Channel to Bay Point
  - 42 Antioch to Oakley
  - 43 Marsh Creek Trail to Rock Slough
  - 44 San Francisco Bay to San Joaquin River Trail \*\*
  - 45 Niles Canyon
  - 46 Niles Canyon to Shadow Cliffs
  - 47 Shadow Cliffs to Morgan Territory
  - 48 Round Valley to Big Break
- Other Regional Trails**
- 1 Coyote Hills to Ardenwood
  - 2 Ardenwood to Quarry Lakes
  - 3 Old Alameda Creek
  - 4 Dunsmuir Heights to Chabot
  - 5 Knowland Park to Redwood
  - 6 Temescal to Sibley
  - 7 Claremont Canyon to Tilden
  - 8 Wildcat Creek\*\*
  - 9 Hercules to Briones
  - 10 Carquinez Strait to Briones
  - 11 Briones to California State Riding & Hiking
  - 12 Orinda Loop (Sibley Orinda, Tilden)
  - 13 Lafayette/Morga to Lafayette Reservoir
  - 14 Lamorinda to Redwood
  - 15 Indian Ridge to Moraga
  - 16 Cull Canyon to Bishop Ranch
  - 17 Don Castro to Pleasanton Ridge
  - 18 Don Castro to Vargas Plateau
  - 19 Garin to Pleasanton Ridge
  - 20 Vargas to Sunol Ridge
  - 21 Pleasanton Ridge to Shadow Cliffs
  - 22 Shadow Cliffs to Del Valle\*\*
  - 23 Doolan Canyon to I-580
  - 24 Arroyo Macho Trail
  - 25 Tassajara Creek
  - 26 Iron Horse to Mt. Diablo
  - 27 Line Ridge to Mt. Diablo
  - 28 California State Riding and Hiking\*\*
  - 29 CNWS to Black Diamond Mines
  - 30 Contra Costa Canal Trail to Delta/DeAnza
  - 31 Great California Delta Trail
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  - 36 Southern Pacific Railroad
  - 37 Marsh Creek Trail to Discovery Bay
  - 38 Mokelumne to Discovery Bay
  - 39 Delta Trail Extension
  - 40 Vasco Caves to Brushy Peak
  - 41 Brushy Peak to Bethany Reservoir
  - 42 Brushy Peak to Del Valle
  - 43 Del Valle to Dam Extension
  - 44 Del Valle to Cedar Mountain
- Notes:  
\*\* Partially completed trails





Off Highway Motor Vehicle Recreation Division  
1725 23<sup>rd</sup> Street, Suite 200, 95816-7100  
Post Office Box 942896  
Sacramento, CA 94296-0001  
(916) 324-4442, FAX (916) 324-1610

December 19, 2007

Mr. Pat O'Brien  
General Manager  
East Bay Regional Parks District  
P.O. Box 5381  
Oakland, CA 94605-0381

Dear Mr. O'Brien:

I want to thank you for the opportunity for California State Parks Off-Highway Motor Vehicle Recreation (OHMVR) Division staff to address the East Bay Regional Parks District (EBRPD) board at their meeting on November 6, 2007, regarding the possible inclusion of the State Parks property referred to in the EBRPD 2007 acquisition plan as Tesla. It was clear some of the information given to the EBRPD by the public was not current and I appreciated the opportunity to give your Board of Directors an update.

As mentioned in OHMVRD staff comments, there are two properties in the Tesla area that are going through the planning process: Alameda-Tesla, and the existing Carnegie State Vehicular Recreation Area (CSVRA). California State Parks intends to continue with establishing a General Plan Amendment for Alameda-Tesla, as well as completing an Environmental Impact Report and updating the existing CSVRA General Plan. The previous planning work in this regard was placed on hold by the OHMVR Division in 2005 until necessary background work related to the health of the watershed in the area could be undertaken and completed.

Although several sources have stated that the Tesla property is not going to be opened to the public, the reality is the OHMVR Division will be moving forward with the planning process starting in the spring of 2008. The plan to be developed for the operation and management of this area will bring a well thought out project that provides an appropriate balance between protection of the site's notable natural and cultural resources as well as providing recreational opportunity. This area will remain in operation and management by the California State Parks OHMVR Division, and is not under consideration for sale. As the process moves forward, we remain open to opportunities for joint interpretive programming with EBRPD staff, in particular, in conjunction with the Black Diamond Coal Mine park unit.

Mr. Pat O'Brien  
December 19, 2007  
Page Two of Two

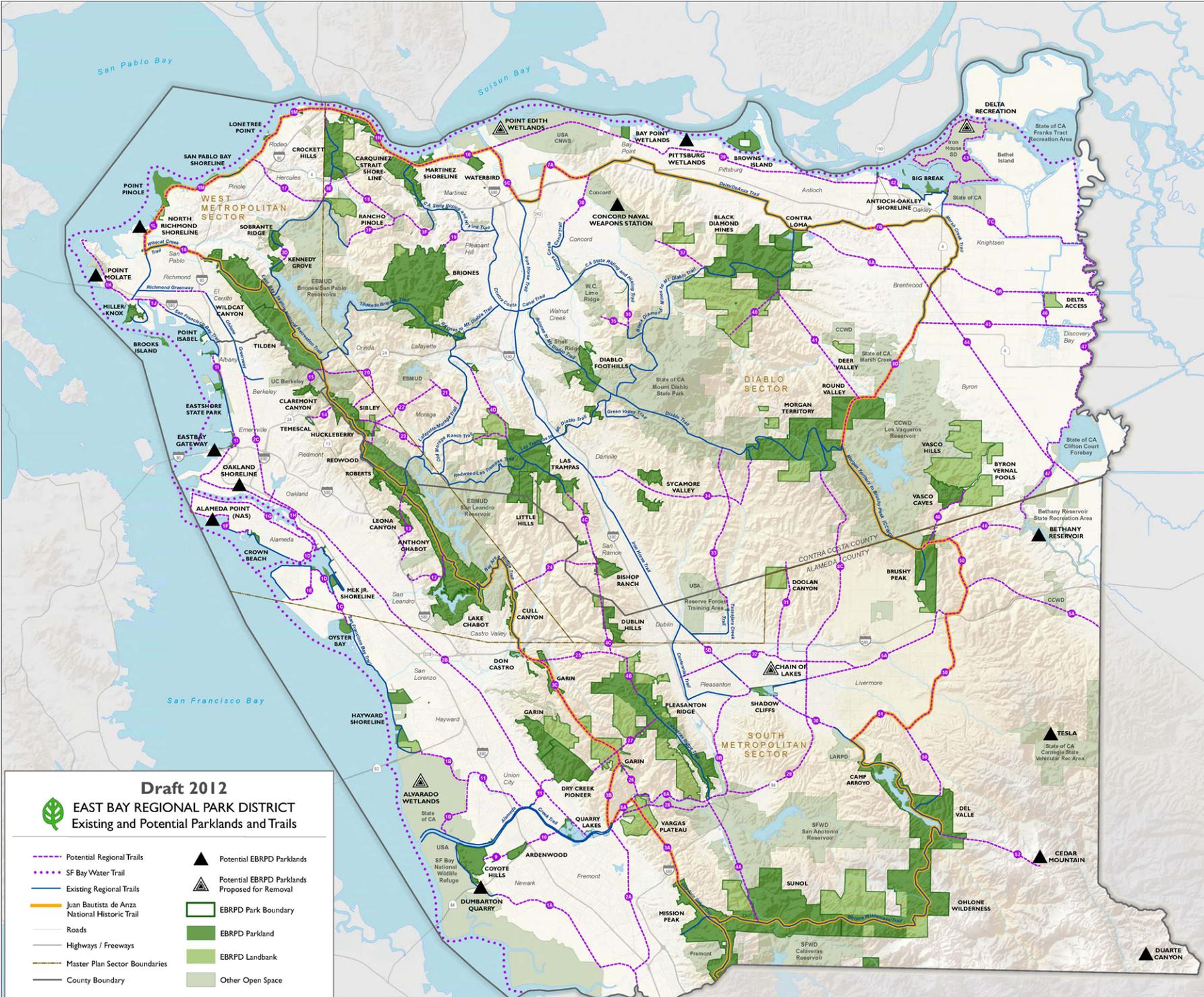
Again, thank you for the opportunity to discuss the Tesla Property and California State Parks' plans for its stewardship and access as part of CSVRA. Please feel free to call me at (916) 324-5801 if you have further questions.

Sincerely,



Daphne C. Greene  
Deputy Director  
Off-Highway Motor Vehicle Recreation Division  
California State Parks

cc: John Sutter, President of the Board, East Bay Regional Parks  
Ruth Coleman, Director, California State Parks  
Paul Romero, Chief Deputy Director, California State Parks  
Rick LeFlore, State Park Superintendent IV, OHMVR Division Headquarters  
Robert Williamson, Superintendent, Twin Cities District, California State Parks



**Draft 2012**

**EAST BAY REGIONAL PARK DISTRICT**  
Existing and Potential Parklands and Trails

- Potential Regional Trails
- SF Bay Water Trail
- Existing Regional Trails
- Juan Bautista de Anza National Historic Trail
- Highways / Freeways
- Master Plan Sector Boundaries
- County Boundary
- ▲ Potential EBRPD Parklands
- ▲ Potential EBRPD Parklands Proposed for Removal
- EBRPD Park Boundary
- EBRPD Parkland
- EBRPD Landbank
- Other Open Space

Note: Designation of an area as a potential site for EBRPD acquisition does not assure acquisition of the site. All existing EBRPD Parklands may be expanded. The map shows all EBRPD land and trails acquired as of Sept. 10, 2007. Locations of potential EBRPD parklands and trails are approximate; some could include several facilities.

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- 42 Brushy Peak to Del Valle
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- 44 Del Valle to Cedar Mountain

Notes:  
\*\* Permit is required on trails that cross EBMUD Lands  
\* Partially completed trail



**From:** [Brian Holt](#)  
**To:** [Mundhenk, Chris](#)  
**Cc:** [joreamos@parks.ca.gov](mailto:joreamos@parks.ca.gov); [McFarland, Elise \(EMCFARLAND@parks.ca.gov\)](mailto:McFarland, Elise (EMCFARLAND@parks.ca.gov)); [rwilliamson@parks.ca.gov](mailto:rwilliamson@parks.ca.gov); [Nancy Wenninger](#); [Larry Tong](#); [Brad Olson](#)  
**Subject:** Carnegie State Vehicular Recreation Area General Plan NOP Scoping Comments  
**Date:** Monday, June 11, 2012 4:44:54 PM  
**Attachments:** [image001.jpg](#)  
[EBRPD : NOP Scoping Comments : Carnegie SVRA 061112.pdf](#)

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Mr. Mundhenk –

Attached are the comments on the Carnegie State Vehicular Recreation Area General Plan NOP. A hard copy will follow by mail.

Thank you!



**Brian W. Holt, AICP**

**Senior Planner** | Interagency Planning

East Bay Regional Park District

2950 Peralta Oaks Court, Oakland, CA 94605

Tel: 510-544-2623 | Fax: 510-569-1417

[BHolt@ebparks.org](mailto:BHolt@ebparks.org) | [www.ebparks.org](http://www.ebparks.org)

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June 11, 2012

AECOM  
Chris Mundhenk, Project Manager  
2020 L St. Suite 400  
Sacramento, CA 95811

**RE: Notice of Preparation – Carnegie State Vehicular Recreation Area General Plan**

Dear Mr. Mundhenk,

The East Bay Regional Park District (“District”) has received a copy of the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) and General Plan for the Carnegie State Vehicular Recreation Area (SVRA) including the 3,478 acre Alameda-Tesla Expansion Area. The plan is being developed by the Off-Highway Motor Vehicle Recreation Division (OHMVR) of the California Department of Parks and Recreation (DPR) pursuant to the California Environmental Quality Act (CEQA) and will address the existing uses at the Carnegie SVRA as well as future uses at the Alameda-Tesla Expansion Area.

The District is a special district operating in Alameda and Contra Costa County with the mission of preserving the natural, scenic, and historic resources of the region and providing for the public’s enjoyment of the resources. We currently manage over 112,000 acres of public open space within 65 regional parks. Three of these parks are State Park facilities that the District manages on behalf of DPR. These include the Robert Crown Memorial State Beach, Del Valle Reservoir State Recreation Area, and Eastshore State Park.

The District has participated in the past public process concerning the Alameda-Tesla Expansion Area. Those comments are provided as attachments and should be considered in the current scoping process for the General Plan Update and EIR (see attached letters to Lester Maddox, dated May 25, 1999; to Lester Maddox, dated May 3, 2000; and to Jennifer Buckingham, dated July 19, 2004).

The District has heard from a number of stakeholders interested in the environmental, historic, and cultural resources within the Alameda-Tesla Expansion Area over the past decade. As a result, the Tesla site was included on the District Master Plan Map as potential parkland during its latest update in 2007.

Scope

The current General Plan will be developed for the existing publically accessible Carnegie SVRA as well as the 3,478 acre Alameda-Tesla Expansion Area. Recreational use at the Carnegie SVRA currently consists primarily of off-highway vehicle (OHV) use and associated staging and camping areas. Future land uses for the Alameda-Tesla Expansion Area have not yet been determined.



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The scope of the EIR and General Plan will need to be appropriately comprehensive to evaluate the existing resources and land uses at the Carnegie SVRA as well as the potential land uses within the Alameda-Tesla Expansion Area. Where existing environmental impacts are identified arising from current uses at the Carnegie SVRA, appropriate mitigation measures will need to be identified and included to reduce impacts to a less than significant level. Within the Alameda-Tesla Expansion Area, the OHMVR should strive to develop new land uses that avoid new impacts to natural, cultural, and historic resources. Any unavoidable impacts will need to be minimized and mitigated to a less than significant level.

### Baseline Resource Assessment

The NOP states that the next step in the General Plan preparation process will be to identify potential issues and opportunities that will be addressed. This issue and opportunity analysis will need to be informed by a comprehensive science-based resource assessment that fully analyzes the biologic, historic, and cultural resources of the property – as well as consideration for the site aesthetics, views of the property from surrounding communities and publically accessible open space areas, and noise within Corral Hollow Canyon.

A comprehensive baseline resource assessment will be essential to inform the development of project alternatives and evaluation of environmental impacts from proposed land uses. This assessment should be conducted with protocols established by the science community that include multi-year surveys that account for seasonal variability.

Additionally, the EIR should include an extensive literature review including the many plans and studies that have been conducted in the eastern Alameda County region during the past decade. These reports would include, but are not limited to, those that have been developed in support of the East Alameda County Conservation Strategy, the Altamont Pass Wind Resource Area Conservation Plan, and materials developed in support of the SRVA Habitat Monitoring System.

### Development of Project Alternatives

The NOP states that land use and resource management provisions have yet to be developed. It is assumed that OHMVR will develop a General Plan that continues the existing OHV use at Carnegie SVRA. However, the District commends the OHMVR Division for initiating an open scoping process that considers all potential recreational uses on the Alameda-Tesla Expansion Area.

A critical step in a successful General Plan process for the Carnegie SVRA and Alameda-Tesla Expansion Area will be to select a proper range of alternatives that provides for a full review and inclusion of all stakeholder interests. The selection of a “preferred alternative” that will be reviewed in the EIR should be made with substantive stakeholder input and consideration of the broad interests and constraints on the Alameda-Tesla Expansion Area property.

Expansion of OHV use throughout the Alameda-Tesla Expansion Area was included in each of the alternatives evaluated in the past General Plan Amendment processes. The current process should include an alternative that provides for only passive non-motorized recreation use within the expansion area. A broad range of stakeholders have expressed interest in passive non-motorized recreational use on the Alameda-Tesla site and have expressed concerns over user-conflict between passive uses and OHV use. A passive non-motorized use alternative should be given equal weight as expanded OHV alternatives during the development of the project alternatives.

## Tesla Mining Complex

Substantial areas of the Alameda-Tesla Expansion Area are incompatible with any expanded OHV use. Amongst these areas is the historic Tesla Mining Complex. The history of this complex is well documented and should be preserved for its historic and cultural values. This area should be identified as “off-limits” to OHV use in all alternatives considered and the General Plan should consider the development of visitor centers and historic exhibits as appropriate to interpret the Tesla Mining Complex.

It should be noted that the existing publically accessible area of the Carnegie SRVA also contains a number of important historic and cultural sites equally worthy of protection. The General Plan should include goals that seek to ensure protection of these resources and expand historic interpretation of these sites for the users of the SRVA.

The District and DPR have had a number of conversations over the years regarding interpretation of the history of the Tesla Mining Complex. We remain interested in working with DPR in a collaborative way to assure the protection and interpretation of this significant cultural and historic site.

## Natural Resource Impacts

The Carnegie SVRA and Alameda-Tesla Expansion Area are located in a unique area that marks the transition between the eco-zones of the coastal hills of the East Bay area and the more arid Central Valley. Such transitional zones are notable for high levels of biodiversity. Many species exist at the outermost extent of their range in the Corral Hollow Canyon making the region an important wildlife corridor and evolutionary store for species diversity.

The EIR will have to evaluate impacts, and identify suitable mitigation, on special status species known to occur in the region. The area also provides habitat for the northernmost range of several arid and desert habitat species including desert olive, desert buckwheat, glossy snake, coachwhip snakes, greater roadrunner, and others. These species may not be considered “special status” under state and federal regulation, but are unique to the Corral Hollow area given the unique habitat conditions resulting from the transitional zones. The EIR should also consider impacts to the locally-unique species that exist throughout the Carnegie SVRA and Alameda-Tesla Expansion Area.

The Habitat Monitoring Systems reports prepared by Carnegie SVRA indicate a much higher level of species diversity and richness on the Alameda-Tesla Expansion Area property. This is likely a result of the heavy recreational use on the Carnegie SVRA property. Land uses within the Alameda-Tesla Expansion Area should be developed in a manner that avoids recreational impacts on species diversity and richness.

Over the past decade, significant progress has been made in acquiring and protecting wildlife corridors throughout the East Bay region. Most notable are the acquisitions made around the foothills of Mount Diablo through the East Contra Costa Habitat Conservation Plan and as mitigation for expansion of the Los Vaqueros Reservoir. Land has been acquired that enables wildlife movement from the protected habitat corridor around Mount Diablo to extend south of I-580. The Carnegie SVRA and Alameda-Tesla Expansion Area are located within this corridor and the General Plan should avoid any land uses that would impact wildlife movement across the property. The EIR should evaluate impacts on wildlife movement into and beyond the SVRA properties.

### Cultural Resource Impacts

The Corral Hollow area also has a well-documented cultural presence of indigenous peoples and contains an array of prehistoric artifacts that should be protected for their archaeological significance. The resource inventory for the General Plan and EIR will need to fully evaluate the indigenous cultural history of the Carnegie SVRA and Alameda-Tesla Expansion Area. Each alternative should be designed to avoid sensitive cultural resource areas. Existing roads and trails that provide access to such areas and could introduce vandalism to cultural resource sites should be closed to public use and restored to a natural condition. Appropriate visitor management strategies should also be identified within the General Plan to ensure cultural resource protection.

### Air Quality

The Global Warming Solutions Act (AB32) was passed in September, 2006. The law mandates that California reduce its greenhouse gas emissions to 1990 levels by 2020. Within the region, the Bay Area Air Quality Management District (BAAQMD) is principally responsible for implementation of AB32 through the Bay Area Clean Air Plan (CAP). The BAAQMD has developed CEQA guidelines to assist lead agencies in the evaluation of air quality impacts arising from their projects. These guidelines should be addressed in the EIR.

The EIR will need to quantify the current emissions generated at the Carnegie SVRA, including those associated with OHV use. Projections of any increased emissions will have to be included that account for expansion of recreational use across the Alameda-Tesla Expansion Area and within the existing SVRA. If the projections are found to conflict with the greenhouse gas reduction goals of the Bay Area CAP, mitigation measures will need to be included to reduce the impact to a less than significant level.

### Water Quality

The existing uses at Carnegie SVRA have resulted in documented water quality and erosion impacts. Plans for the Tesla-Alameda Expansion Area should be designed in a manner that avoids any further impact. The EIR should provide a thorough overview of past water quality impacts and the actions that have been implemented to address the existing uses. The EIR should thoroughly describe the assessment of the Corral Hollow watershed and the Storm Water Management Plan for the SVRA.

### Conclusions

The District recognizes the difficulty of balancing natural and cultural resource protection with provision of public recreation facilities. The Carnegie SVRA serves as a valued recreational site for the OHV community. However, given the unique natural, historical, and cultural resources of the Carnegie SVRA and Tesla-Alameda Expansion Area legitimate concerns regarding the impacts of such recreation remain. A comprehensive, open, and inclusive General Plan and EIR process will be necessary to provide for public access to the Tesla-Alameda Expansion Area while ensuring that existing uses at the Carnegie SVRA can continue in a sustainable manner.

The General Plan and EIR should be developed in a manner that addresses current conditions, avoid future impacts, and provides for sustainable recreational use and public access on the existing Carnegie SVRA and Tesla-Alameda Expansion Area.

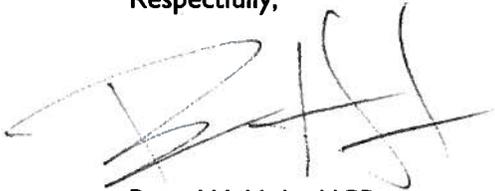
The General Plan will need to be progressive in its visitor management strategies and establishment of resource protection zones to ensure that critical resources are protected while providing for

recreational use. Mitigation strategies will need to be developed with consideration for future uses while assessing the existing conditions and impacts of historical use. The OHMVR should consider all appropriate strategies and alternatives in developing a General Plan built upon science and stakeholder input.

The District looks forward to working with the OHMVR on an open and inclusive process. Further, we are eager to collaborate on projects where we have mutual goals.

We look forward to remaining engaged throughout this process and would appreciate notice of any meetings or documents as they become available. Please feel free to contact me at (510) 544-2623 or [bholt@ebparks.org](mailto:bholt@ebparks.org) should you have any questions.

Respectfully,

A handwritten signature in black ink, appearing to read 'B. Holt', written over a faint, larger signature.

Brian W. Holt, AICP

Attachments: (1) Letter to Lester Maddox, dated May 25, 1999;  
(2) Letter to Lester Maddox, dated May 3, 2000;  
(3) Letter to Jennifer Buckingham, dated July 19, 2004

CC: Ayn Wieskamp, EBRPD Board of Directors  
Robert E. Doyle, EBRPD General Manager  
Robert Williamson, OHMVR District Superintendent  
Joe Ramos, OHMVR State Park Superintendent II – Carnegie SVRA

# REGIONAL PARKS

EAST BAY REGIONAL PARK DISTRICT



May 25, 1999

Mr. Lester Maddox  
CDPR, OHVMR Division  
1725 - 23rd Street, Suite 200  
Sacramento, CA 94296-0001

Subject: EIR Scoping Comments - Carnegie State Vehicle Recreation Area - Tesla Expansion

Dear Mr. Maddox:

The East Bay Regional Park District ("District") recently received a copy of the Notice of Preparation (NOP) for the Draft Environmental Impact Report for the Carnegie State Vehicle Recreation Area ("Carnegie"),<sup>1</sup> Tesla Expansion Project. Unfortunately, we did not receive the NOP until April 29, 1999. Upon receipt of the document, I called the State Clearing House and was granted an extension by Ms. Mosie Boyd.

BOARD OF DIRECTORS

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*Bob O'Brien*  
General Manager

The District has for some time been interested in the Department of Parks and Recreation's ("DPR") proposal to acquire properties in the Tesla area, however we have some concerns about using the majority of this area for off highway vehicle (OHV) purposes. In particular, we are concerned that this expansion will not meet the diverse and growing recreational needs of the Alameda-San Joaquin area, and we are concerned about project related impacts to special-status species.

## Recreation and Open Space Demand

We currently manage more than 91,000 acres of public open space in Alameda and Contra Costa County. This figure includes 55 regional parks, two of which are designated State Recreation facilities which the District manages on behalf of DPR. These are the Robert Crown Memorial State Beach in Alameda and Del Valle Reservoir State Recreation Area, just south of Livermore. The District recently acquired, with DPR, more than nine miles of San Francisco Bay Shoreline that will eventually be designated Eastshore State Park. Finally, our 1997 *Master Plan* identifies Bethany Reservoir as another State facility that would be managed for DPR by the District.

The eastern half of Alameda and Contra Costa Counties is one of the fastest growing regions in the United States. The City of Livermore is contemplating development of 14,000 housing units within ten miles of Carnegie; the City of Dublin is considering 18,000 housing units within fifteen miles; and San Joaquin County is considering about another 15,000 housing units within ten miles. Cumulatively, more than 47,000 housing units, providing homes for 150,000 people, will be seeking open space in this area for recreation within the next twenty years.

The District has been attempting to respond to such growth by acquiring open space to meet this demand. Recently we optioned an 1,100 acre property in North Livermore that will be added to the Brushy Peak Preserve. We acquired another 200 acres of land for Del Valle Reservoir in 1998. Unfortunately, the District currently does not have additional land acquisition funding sources, which means that other public lands in this area, such as Carnegie, need to provide for some of this recreational and open space demand.



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May 25, 1999  
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### Special-Status Species and Biological Diversity

In 1991, the Secretary of Resources and the Secretary of the Interior signed "The Agreement on Biodiversity" which provided for a comprehensive approach to conserving biological resources in California. In response to this agreement, the Department of Fish and Game and the US Fish and Wildlife Service began efforts to promote the formation of regional biodiversity planning groups that could help to achieve the goals set forth in the 1991 agreement. In 1992, District staff began meeting with representatives from Alameda and Contra Costa Counties, East Bay Municipal Utilities District, Contra Costa Water District and the California Department of Fish and Game. This "steering committee" signed an agreement that established the Alameda-Contra Costa Biodiversity Working group ("BWG"). The purpose of the BWG is to provide a coordinated approach for conserving biological diversity in the East Bay while accommodating appropriate developments. In 1994, the BWG steering committee initiated an East County Biodiversity Study which looked at opportunities for maintaining biological diversity while accommodating development in a 227,000 acre area of eastern Alameda and Contra Costa Counties which includes the Tesla area and the Carnegie SVRA properties in Alameda County. The Tesla area was identified in the study analysis for its rich diversity of habitats and species, and because it is sparsely developed. The District continues to work with the BWG and the resource agencies to promote the conservation of important open space areas, including the Tesla area.

### Project Objectives

The NOP states that 65,000 people visited Carnegie in 1998. At that same time, 330,000 visitors came to Del Valle Reservoir State Recreation Area. While Carnegie provides for OHV uses, Del Valle Reservoir serves a much broader set of users, including boaters, fishers, swimmers, wind surfers, campers, equestrians, bicyclists, hikers, picnickers and many other types of uses and special events. These diverse uses have little or no impact on the environment and other potentially competing open space and recreational uses. By contrast, the project objectives contained in the NOP support an expanded OHV program, with protection of the environment and allowance for other, non-OHV uses only where they do not conflict with OHV uses. Such objectives may be inconsistent with the needs of existing users of State and regional facilities in the area, and they do not appear to be reflective of the demand for new and expanded multi-purpose, open space oriented facilities to meet the needs of this urbanizing area. We recommend that the project objectives be reconsidered in light of the range of recreational needs that are needed for this growing area.

### Recreational Impacts

*Parklands:* The District has long term plans for the development of a new regional park at Cedar Mountain. Would the Tesla expansion area be visible or adversely affect views from this area or Del Valle Reservoir? What measures will the DPR take to protect adjacent and nearby areas from dust, noise and other impacts associated with the proposed expansion project?

*Regional Trails:* The National Park Service (NPS) has plans for development of the DeAnza National Historic Trail which will run from northern Mexico through California to its northern terminus at the Sacramento-San Joaquin Delta near Pittsburg. The District has constructed segments of this trail in the Pittsburg-Antioch area, known locally at the Delta-DeAnza Trail. The NPS final Environmental Impact Statement and the District's 1997 *Master Plan* (see Segments 7A & 7B) identify the alignment of the DeAnza Trail as running south from Antioch, passing through Bethany Reservoir, through the Tesla area and south to the Alameda-Santa Clara County line. This trail is of international significance and does appear to

Mr. Lester Maddox  
May 25, 1999  
Page 3

have been identified in the NOP for the Carnegie expansion. The project EIR should evaluate how this trail corridor may be adversely affected by the proposed project. This would include dust, noise and possible conflicts with OHV recreation. We encourage the DPR to consult with the NPS and State Historic Preservation Officer (SHPO) on the historical significance and potential project impacts to this trail corridor and project related effects to the historical resources of the Tesla area.

*Public Safety and Fire:* How will DPR prevent illegal trespass of OHV users onto adjacent public and private lands? How will fire safety be addressed through this project? How would changes in the natural fire regime affect adjacent land uses, land management practices and special-status species?

#### Natural Resource Impacts

As previously discussed above, the District is interested in promoting the conservation of biological diversity on a regional basis. Most of the sensitive natural resources identified in the project area are also known to occur on nearby lands owned or managed by the District. The District has considerable experience in conserving and managing these species to meet our *Master Plan* goals and to comply with State and federal laws and regulations which protect these species. One of the District's goals identified in our 1997 *Master Plan* is to work with other agencies and private land owners to promote the conservation of biological diversity in the East Bay. This provides the context under which we are commenting on potential projects impacts and protection of natural resources in the project area.

*Water Quality:* It appears that this project could result in increased erosion within the Tesla expansion area. Increased sediment loads and reduced pH in the drainages and ponds on the property may adversely affect the native fisheries, amphibians and reptiles in Arroyo Seco, Corral Hollow Creek and Mitchell Ravine. Initial project studies show that several sensitive special-status species are present that may be adversely affected by this project. Large buffers should be established around drainages which contain these species.

*Special-Status Plants:* The rayless ragwort was presumed to have been extirpated from Alameda and Contra Costa Counties until this population was found at Carnegie. Impacts this plant should be avoided because of its rarity in Alameda County.

The District recently participated in the reintroduction of the Federally endangered large-flowered fiddleneck (*Amsinckia grandiflora*) into Black Diamond Mines Regional Preserve near Antioch. Although this plant was not found in the initial project surveys, four other species in the genus *Amsinckia* were found to be present. It is likely that the project area provides suitable habitat for the large-flowered fiddleneck. The fiddleneck is known to occur to the northeast at Site 300 and to the southeast at Conolly Ranch. We recommend regular monitoring at Carnegie and implementation of avoidance measures should these plants be found in OHV use areas.

*Special-Status Animals:* The NOP appears to understate the importance of the Tesla expansion area for the San Joaquin kit fox and the Alameda whipsnake. This project is within the range of both species. We understand that some of the adjacent ranching families may have granted conservation easements on their lands to protect habitat for these species. The project EIR should also address potential off-site impacts to special-status species from development of the expansion area.

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Project Alternatives

In addition to the two proposed project alternatives, we recommend that DPR evaluate a third project alternative which calls for the acquisition of open space and the establishment of more appropriate recreational and open space uses that protect existing natural and cultural resources. Such an alternative could provide for a range of compatible uses that would protect existing natural and cultural resources and help meet the recreational and open space needs of the area.

Whatever project alternatives are evaluated in the EIR will need to address which lands will be set aside for habitat mitigation purposes and what are compatible uses, such as hiking, that can take place on these lands. The District has been successful in working with State and federal resource agencies in developing such arrangements for its own development projects. We would welcome the opportunity to work with DPR on a coordinated strategy for protecting open space in this area.

I have enclosed a copy of our 1997 *Master Plan* Map which shows the locations of our existing and proposed open space and recreational facilities in Alameda and Contra Costa Counties. Please provide us with a copy of the draft Environmental Impact Report and any supporting technical studies and plans that are developed or have already been developed for this project. If you have any questions, please call me at (510) 544-2622.

Sincerely,



Brad Olson  
Environmental Specialist

Attachments (1)

cc. George Cardinet  
Chris Bazar, Alameda County  
Ron Shafer, DPR  
Meredith Caplin, NPS

EAST BAY REGIONAL PARKS DISTRICT



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May 3, 2000

Mr. Lester Maddox  
 CDPR, OHVMR Division  
 1725 - 23rd Street, Suite 200  
 Sacramento, CA 94296-0001

Subject: EIR Comments - Carnegie State Vehicle Recreation Area - Tesla Expansion

Dear Mr. Maddox:

The East Bay Regional Park District ("District") recently received a copy of the draft Environmental Impact Report for the Carnegie State Vehicle Recreation Area ("Carnegie"), Tesla Expansion Project. In addition to the comments contained in this letter, I have enclosed a copy of our May 25, 1999, scoping letter which provides additional background information and comments on this project that should be addressed in the final EIR. This letter and our previous scoping letter comprise our comments on the draft EIR.

Non-Motorized Public Access Impacts

The District has for some time been interested in the Department of Parks and Recreation's ("DPR") proposal to acquire properties in the Tesla area, however we have concerns about using this area for off highway vehicle (OHV) purposes with no portion being designated for non-motorized uses or to serve as part of the National DeAnza Trail. It appears that this expansion will not meet the diverse and growing recreational needs of the Alameda-San Joaquin area, and we are concerned about project related impacts to special-status species. We raised these concerns in our scoping letter of May 25, 1999, and requested that DPR evaluate an alternative that provided for non-motorized uses. We are disappointed to learn that DPR has rejected this alternative because DPR believes such an alternative would not meet project objectives. We reviewed the project objectives described on page 2-3 of the draft EIR and could find no conflicts between our proposed alternative and the stated objectives. We believe the alternative we proposed satisfies the criteria described in CEQA Guidelines Section 15126.6 and should have been considered in the EIR.

The draft EIR notes on pages ES-2, 2-3 and 2-10 that non-OHV uses may be permitted at the discretion of the park staff so long as they do not conflict with OHV uses. In the discussion of the different types of roads that will be constructed (pages 2-6 and 2-7) there is no mention of how non-motorized trail users would be accommodated on these roads or if such use would conflict with OHV uses. Such discussion would appear to be essential if DPR is to actually allow for non-motorized uses. We could find no discussion of the potential impacts of non-motorized uses in the Draft EIR. This is particularly of concern where the EIR proposes to locate non-motorized uses in the "Wildlife and Plant Protection Areas" as described on page 2-10. In our experience, such usage must be carefully planned and evaluated so that the goals for resource preservation do not conflict with public access.



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May 3, 2000  
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It is our belief that motorized and non-motorized recreation are inherently in conflict with each other and cannot be feasibly and safely provided on the same roads. In most of the 59 parks the District manages, park visitors are typically seeking solitude when they use open space areas. The noise and disruption of OHV's using the same roads as hikers and equestrians appears to conflict with the need for solitude. OHV's move much faster than non-motorized trail users and could collide with non-motorized users or spook horses, resulting in increased risk of personal injury. We believe that both types of uses can be provided at Carnegie, only in separate areas. The EIR does not appear to address this potentially significant conflict of use or the need for separate locations for the two uses.

### National De Anza Trail Impacts

Our May 25, scoping letter also noted that the proposed Tesla Expansion area could conflict with the historic route of De Anza expedition and the proposed route of the National De Anza Trail. Figure 2-1 in the draft EIR shows the proposed locations of the OHV roads that would be constructed at part of this project. We can find no mention of the historic De Anza route or proposed trail in the EIR text or figures. The roads plan on Figure 2-1 would appear to preclude construction of this historic trail. CEQA Guidelines state that an EIR must evaluate project consistency with other adopted plans, policies and programs. The National De Anza Trail was described and evaluated in an Environmental Impact Statement prepared and adopted by the National Park Service was also adopted by the District when it approved its Master Plan in 1997. Furthermore, the significance criteria described on page 3-2 of the draft EIR specifically states that such conflicts would be considered a significant impact under CEQA. This is a significant impact not addressed in the EIR.

We could find no mention in the draft EIR of the historical context and integrity of the route of the De Anza expedition. The cultural resources section provides information on the history and pre-history of the project area, yet fails to mention the expedition route even though it was specifically identified in our scoping letter and accompanying map. The criteria contained on page 10-11 clearly identifies that a historical resource may be eligible for inclusion in the California Register of Historical Resources (and the National Register of Historical Places) if it "is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage" or "is associated with the lives of person important in our past." Clearly, the route of the De Anza expedition, a route of international significance, would meet this criteria for inclusion. Page 10-15 of the draft EIR identifies seven significance criteria that must be considered to determine the relative significance of a project impact. It would appear that potential project impacts to the historic expedition route would exceed at least five of these criteria and is a significant, unmitigated impact not addressed in the EIR.

We understand that the National Park Service may not have received a copy of the draft EIR for its review and comment. Please contact Meredith Lane, DeAnza Trail Project Manager, at (415) 427-1438.

### Natural Resource Impacts

The number and extent of special-status plants and animals on the Tesla expansion area is truly remarkable and is indicative of the significant habitat value that this area provides. The draft EIR has identified a range of potential impacts and mitigation measures to reduce impacts, however the cumulative impact in this sensitive area appears to be understated by the EIR. While other lands, such as Site 300, serve as a model for site-appropriate development and resource stewardship, the proposed

Mr. Lester Maddox  
May 3, 2000  
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project will impact many special-status species who require otherwise undisturbed blocks of habitat for their long-term survival. In order to mitigate the individual and cumulative impacts to these resources, the EIR should evaluate the need to acquire addition habitats that are protected and managed solely for the benefit of the impacted species. If funding or lands are not available for such purposes, then the EIR should address scaling back the extent of new roads and facility development, leaving some areas roadless and in permanent protection status.

Our interest in commenting on this project is to promote regional cooperation in providing park and recreation facilities to meet the growing needs of the East Bay, and equally important, to promote the conservation of biological diversity and cultural resources in the East Bay. We believe that the proposed plan is not responsive to these needs and we hope that these comments will provide some useful information in developing an expansion plan that can meet these goals. Please call me if you wish to discuss our letter. I can be reached at (510) 544-2622.

Sincerely,



Brad Olson  
Environmental Specialist

Attachments (1)

cc. Ayn Wieskamp, EBRPD Board of Directors  
Pat O'Brien, General Manager EBRPD  
Robert Doyle, Asst. General Manager EBRPD  
Steve Fiala, Trails Specialist EBRPD  
Chris Bazar, Alameda County  
Dr. Tina Carlson, Lawrence Livermore Labs  
Scott Wilson, DFG  
Shiela Larsen, USFWS  
Meredith Caplin, NPS  
Jeff Miller, Alameda Creek Alliance  
Nancy DuPont, Heritage Trails  
George Cardinet  
Charlie Willard  
Hulet Hornbeck



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*Pat O'Brien*  
General Manager

July 19, 2004

Ms. Jennifer Buckingham  
OHMVR  
1330 White Rock Road  
Rancho Cordova, CA 95742-6700

Subject: EIR Scoping Comments - Carnegie State Vehicle Recreation Area - Tesla Expansion

Dear Ms. Buckingham:

The East Bay Regional Park District ("District") received a copy of the Notice of Preparation (NOP) for the Draft Environmental Impact Report for the Carnegie State Vehicle Recreation Area ("Carnegie"), Tesla Expansion Project. This letter is the third set of written comments that the District has submitted on this project. Prior comments include a scoping letter to Lester Maddox of May 25, 1999, and a May 3, 2000, letter to Mr. Maddox on the Draft EIR. We also participated in the 1999 scoping meeting and subsequent meetings and conversations with Department of Parks and Recreation ("DPR") about this project. The following scoping comments are very similar to earlier comments made by the District because in many respects the proposed project will result in similar impacts to those described in the earlier draft EIR.

The District has for some time been interested in DPR's acquisition in the Tesla area; however, we have concerns about using the area solely for off highway vehicle (OHV) purposes. In particular, we are concerned that this expansion will not meet the diverse and growing recreational needs of the Alameda-San Joaquin area, and we are concerned about project related impacts to natural and cultural resources of this unique area.

#### Recreation and Open Space Demand

The District currently manages more than 95,000 acres of public open space in Alameda and Contra Costa County. This figure includes 63 regional parks, four of which are State Park facilities that the District manages on behalf of DPR. These are the Robert Crown Memorial State Beach, Del Valle Reservoir State Recreation Area, Eastshore State Park and portions of Cowell Ranch State Park. Our 1997 *Master Plan* also identifies Bethany Reservoir as another State facility that would be managed for DPR by the District.

The eastern half of Alameda and Contra Costa Counties is one of the fastest growing regions in the United States. More than 47,000 housing units, providing homes for 150,000 people are planned for development within a 20-mile radius of Carnegie SVRA in the next twenty years. These new residents will be seeking a broad range of recreational uses on public open space. Many of these uses are not compatible with OHV recreation. The District is attempting to respond to the planned growth in this area by acquiring open space to meet this demand. Unfortunately, we cannot meet this demand without the cooperation of other public agencies. The Carnegie plan responds to basically one special-interest type of recreation and is not responsive to the growing population that is seeking solitude and undisturbed access to public open space to get away from the rapidly expanding urban development of this area.

The NOP states that 144,259 people visited Carnegie in 2003. In that same year, 302,470 visitors came to Del Valle Reservoir State Recreation Area. Del Valle Reservoir serves a broad set of users, including boaters, fishers, swimmers, wind surfers, campers, equestrians, bicyclists, hikers, picnickers and special events. These diverse uses have little on the environment and other potentially competing uses.



The proposed project objectives contained in the NOP support an expanded OHV program, with protection of the environment and allowance for other, non-OHV uses only where they do not conflict with OHV uses (*see* NOP page 53). Such objectives may be inconsistent with the needs of recreational users in the area, and they do not appear to be reflective of the demand for new and expanded multi-purpose, open space oriented facilities. We recommend that the project objectives be reconsidered in light of the range of recreational needs that are needed for this growing area.

It is not clear in the NOP what is meant by the word "trail". The District uses "trails" to designate areas for hiking, biking and equestrians, and "roads" to designate areas that are used by police, fire, land stewardship and ranger access to the open space. Most of the District's roads also serve double duty as trails, but not all trails are roads. Page 11 states there will be trails for "hiking and mountain biking only" in the area southwest of Tesla Road; however, Figure 1-3 shows these "trails" as "administrative roads". We could find no commitment in the NOP to provide non-motorized trails anywhere within this 5,033-acre recreation area.

### Recreational Impacts

*Parklands:* The District has long term plans for the development of a new regional park at Cedar Mountain. Would the Tesla expansion area be visible or adversely affect views from this area or Del Valle Reservoir? What measures will the DPR take to protect adjacent and nearby areas from dust, noise and other impacts associated with the proposed expansion project?

*Regional Trails:* The National Park Service (NPS) plans to develop the De Anza National Historic Trail that runs from Mexico through California to its terminus at the Sacramento-San Joaquin Delta near Pittsburg. The District has constructed segments of this trail in the Pittsburg-Antioch area, known locally at the Delta-De Anza Trail. The NPS final Environmental Impact Statement and the District's 1997 *Master Plan* (Segments 7A & 7B) identify the alignment of the De Anza Trail as running south from Antioch, passing through Bethany Reservoir, through the Tesla area and south to the Alameda-Santa Clara County line. This trail is of international significance and was not properly identified or considered in the 2000 DEIR for this project. The new draft EIR should evaluate how this trail corridor may be adversely affected by the proposed project. This would include dust, noise and possible conflicts with OHV recreation. We encourage the DPR to consult with the NPS and State Historic Preservation Officer (SHPO) on the historical significance and potential project impacts to this trail corridor and project related effects to the historical resources of the Tesla area.

*Public Safety and Fire:* How will DPR prevent illegal trespass of OHV users onto adjacent public and private lands? How will fire safety be addressed through this project? How would changes in the natural fire regime affect adjacent land uses, land management practices and special-status species?

### Natural Resource Impacts

The District is interested in promoting the conservation of biological diversity. Most of the sensitive natural resources identified in the project area also occur on lands owned or managed by the District. The District has considerable experience in conserving and managing these species to meet our *Master Plan* goals and to comply with State and federal laws and regulations that protect these species. One of the District's goals is to work with other agencies and private landowners to promote the conservation of biological diversity in the East Bay. This policy provides the context for our comments on potential projects impacts.

*Water Quality:* This project could result in increased erosion within the Tesla expansion area. Increased sediment loads and reduced pH in the drainages and ponds on the property may adversely affect the native fisheries, amphibians and reptiles in Arroyo Seco, Corral Hollow Creek and Mitchell Ravine. Project studies show that several sensitive special-status species are present that may be adversely affected by this project.

Large buffers should be established around drainages that contain these species.

*Special-Status Plants:* The rayless ragwort was presumed to have been extirpated from Alameda and Contra Costa Counties until this population was found at Carnegie. Impacts this plant should be avoided because of its rarity in Alameda County.

The District participated in the reintroduction of the federally endangered large-flowered fiddleneck (*Amsinckia grandiflora*) at Black Diamond Mines Regional Preserve near Antioch. Although this plant was not found in the initial project surveys, four other species in the genus *Amsinckia* were found to be present. It is likely that the project area provides suitable habitat for the large-flowered fiddleneck. The fiddleneck is known to occur to the northeast at Site 300 and to the southeast at Connolly Ranch. We recommend regular monitoring at Carnegie and implementation of avoidance measures should these plants be found.

*Special-Status Animals:* The NOP appears to understate the importance of the Tesla expansion area for the San Joaquin kit fox and the Alameda whipsnake. This project is within the range of both species. We understand that some of the adjacent ranching families may have granted conservation easements on their lands to protect habitat for these species. The project EIR should also address potential off-site impacts to special-status species from development of the expansion area.

*Wildlife Corridors:* The Carnegie SVRA represents a significant block of public lands in the Altamont Hills. Wildlife movement between the San Joaquin Valley and eastern Alameda and Contra Costa Counties would occur across the SVRA property. This corridor is especially important for golden eagle and San Joaquin kit fox. Impacts to plants, wildlife and special status species using this corridor must be considered individually, cumulatively and within the larger regional context of this resource rich area.

#### Habitat Conservation Plan and Project Alternatives

Preparation of a Habitat Conservation Plan (HCP) for this project can be a good tool in determining which areas should be set aside and which areas can be developed for OHV facilities; however, the HCP work must be done before the project alternatives are selected. Accordingly, it appears improper for the EIR to proceed prior to the preparation of the HCP.

We recommend that the HCP and EIR evaluate a project alternative that calls for the acquisition of open space and the establishment of more appropriate recreational uses that protect existing natural and cultural resources. Whatever project alternatives are evaluated in the EIR will need to address which lands will be set aside for habitat mitigation purposes and what are compatible uses, such as hiking, that can take place on these lands. The District has been successful in working with State and federal resource agencies in developing such arrangements for its own development projects. We would welcome the opportunity to work with DPR on a coordinated strategy for protecting open space in this area.

If you have any questions, please call me at (510) 544-2622.

Sincerely,



Brad Olson  
Environmental Programs Manager

cc. Meredith Caplin, NPS