



December 11, 2025

To: **California State Parks**  
**Off-Highway Motor Vehicle Recreation Division**  
**Off-Highway Motor Vehicle Recreation Commission**

- Wade Crowfoot, Secretary, CA Natural Resources Agency
- Armando Quinterro, Director, CA Department of Parks and Recreation
- Liz McGuirk, Chief Deputy Director, CA Department of Parks and Recreation
- Alexandra Stehl, Deputy Director, CA State Parks Strategic Planning & Recreation Services
- Sarah Miggins, Deputy Director, Off-Highway Motor Vehicle Recreation Division
- Roger Salazar, OHMVR Commission Chair
- Edward Patrovsky, OHMVR Commission Vice-Chair
- Kat Anderson, OHMVR Commissioner
- Shaun Flanigan, OHMVR Commissioner
- Tom Lemmon, OHMVR Commissioner
- Nicholas Mueller, OHMVR Commissioner
- Tommy Randle, OHMVR Commissioner
- Diane Ross-Leech, OHMVR Commissioner
- Patricia Urena, OHMVR Commissioner

Re: **CEQA Obligations and Easement Approval for the Coyote Creek Agrivoltaic Ranch Project**

Dear Secretary Crowfoot, Directors, and Commissioners:

This letter, accompanying FAQ sheet, and comment letters are submitted regarding the potential granting of easements or right-of-way approvals across or adjacent to Prairie City State Vehicular Recreation Area (SVRA) for the proposed Coyote Creek Agrivoltaic Ranch Project in Sacramento County. Because California State Parks and the OHMVR Division will be asked to authorize an easement for the project, your agencies will become responsible agencies under the California Environmental Quality Act (CEQA).

We write to respectfully advise that the Final Environmental Impact Report (FEIR) certified by Sacramento County is legally and procedurally inadequate and therefore cannot be relied upon by State Parks or the OHMVR Division to support an easement approval. Under CEQA, a responsible agency may rely upon a lead agency's EIR only if the document is legally sufficient and includes substantial evidence supporting its conclusions (CEQA Guidelines §15096(a), (f)). When a document is incomplete or defective, a responsible agency may not lawfully rely on it to issue approvals.

Because the Coyote Creek project's FEIR contains major deficiencies - including incomplete analysis of Prairie City SVRA operational impacts, failure to evaluate impacts on State-managed public lands pursuant to the Public Resources Code, the improper deferral of mitigation, and failure to conduct required interagency consultation - State Parks cannot properly rely upon Sacramento County's FEIR to satisfy CEQA obligations for an easement approval.



As CEQA requires, an easement across State Parks land constitutes a discretionary approval, and discretionary approvals may not be issued unless environmental impacts have been fully analyzed and mitigated, and CEQA findings can be made based on substantial evidence (CEQA Guidelines §§15037, 15096(h)). If the environmental analysis on which the project depends is defective, State Parks lacks the legal basis to make required CEQA findings.

Where a responsible agency is unable to rely on the lead agency's CEQA document, California law provides only two lawful paths:

1. **Require the lead agency to correct and recertify the environmental document.** State Parks may require the County to prepare supplemental analysis, recirculate the EIR to address significant new information added, and adopt new mitigation measures or conditions.
2. **Prepare independent CEQA environmental review.** If the County declines or fails to prepare an adequate environmental document, State Parks and the OHMVR Commission must conduct their own CEQA review - including supplemental environmental analysis, a subsequent EIR, or an addendum addressing impacts relevant to the easement approval.

In either case, the agency cannot rely on an inadequate FEIR as the basis for an easement approval. Doing so would expose the State agency to legal challenge and risk invalidation of the easement and approval itself, as well as contravene the statutory mandate under Public Resources Code §5090.24 to protect the long-term viability of State Vehicular Recreation Areas.

For these reasons, we respectfully request that California State Parks and the OHMVR Division decline any easement approval for the Coyote Creek Agrivoltaic Ranch Project **until such time as CEQA has been fully satisfied and corrected environmental review is available for responsible-agency consideration.**

Thank you for your attention to this matter and for your ongoing stewardship of California's State Vehicular Recreation Areas. We request placement of this matter on the public agenda for the next forthcoming OHMVR Commission meeting for Commission and Division discussion, oversight, and action.

Sincerely,

Rose Winn  
Natural Resources Consultant  
California Four Wheel Drive Association