

**California Department of Parks and Recreation
Carnegie State Vehicular Recreation Area
Resource Management Area Program**

**Final
Environmental Impact Report**

SCH No. 2023020424

June 2026



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Carnegie State Vehicular Recreation Area Resource Management Area Program

Final Environmental Impact Report/ Environmental Assessment

SCH No. 2023020424

June 2026



Prepared for:

California Department of Parks and Recreation
Diablo Range District
15751 Tesla Road
Livermore, CA 94550
(925) 447-0426

Prepared by:

MIG, Inc.
2055 Junction Avenue, Suite 205
San Jose, CA 95131
(650) 327-0429

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**CARNEGIE SVRA
RESOURCE MANAGEMENT AREA PROGRAM
FINAL ENVIRONMENTAL IMPACT REPORT/**

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CHAPTER 1 INTRODUCTION

This document is the Final Environmental Impact Report (EIR) for a Resource Management Area (RMA) Program at Carnegie State Vehicular Recreation Area (SVRA) in eastern Alameda and western San Joaquin counties. The EIR is prepared as an informational document for action by the California Department of Parks and Recreation (DPR) as the California Environmental Quality Act (CEQA) Lead Agency for the project to evaluate the potentially significant environmental impacts that may result from the proposed Carnegie SVRA RMA Program (Project).

Consistent with CEQA Guidelines section 15132, this Final EIR comprises:

- The Draft EIR (bound as a separate document).
- Comments and recommendations received on the Draft EIR; comments are reproduced verbatim.
- A list of persons, organizations, and public agencies commenting on the Draft EIR.
- The responses of the lead agencies to significant environmental points raised in the review and consultation process.
- Any other information added by the Lead Agency.

In accordance with CEQA Guidelines section §15132, this document together with the January 2026 Draft EIR constitutes the Final EIR for the Carnegie SVRA RMA Program.

1.1 ENVIRONMENTAL REVIEW PROCESS

1.1.1 Public Scoping of Draft EIR

DPR determined that the implementation of the proposed Carnegie SVRA RMA Program could potentially have a significant impact on the environment requiring that an EIR be prepared pursuant to CEQA. Accordingly, DPR issued a Notice of Preparation (NOP) of an EIR for the proposed Project on February 17, 2023. The NOP was filed at the State Clearinghouse and was posted at the Alameda County Clerk-Recorder Office and the San Joaquin County Clerk-Recorder Office on February 17, 2023. The NOP was also distributed to DPR stakeholders, adjacent communities and property owners, and to relevant staff of the lead agencies and responsible agencies. DPR provided a 30-day public review period for the NOP from February 17 to March 20, 2023.

Four comment letters or emails were received in response to the NOP including letters from the Native American Heritage Commission (NAHC), Central Valley Regional Water Quality Control Board (RWQCB), and two individuals. The NOP and NOP comment letters are presented in Appendix A of the Draft EIR.

1.1.2 Public Review of Draft EIR

On January 23, 2026, a Notice of Completion of the Draft EIR and a Notice of Availability (NOA) for the Draft EIR was posted at the California Governor's Office of Land Use and Climate Innovation, State Clearinghouse. DPR emailed the NOA to local agencies, other potentially interested agencies, organizations, and individuals. The NOA was also published in the local daily newspaper: the Independent on January 23, 2026.

The Draft EIR was circulated for a 45-day commenting period between January 23 and March 10, 2026. Hard copies were made available for review at the Diablo Range District office, located at 15751 Tesla Rd, Livermore CA 94550. In addition, the Draft EIR was made available online on DPR's website: https://ohv.parks.ca.gov/?page_id=26379.

1.1.3 Agency Review of Responses to Comments

Upon completion of the 45-day public review period, written responses to all significant comments raised with respect to the environment were prepared and incorporated into the Final EIR. Written responses to comments received from public agencies have been made available to those agencies at least 10 days before DPR considers certification of the Final EIR. The comments and their responses will be considered by DPR when deciding whether to certify the Final EIR and approve the Carnegie SVRA RMA Program.

1.2 CHANGES TO THE DRAFT EIR

CEQA anticipates that the public review process will elicit information that can result in modification of the project design and refined impact analysis to reduce potential environmental effects of the project. As provided in CEQA Guidelines section 15088.5, when significant new information is added to the EIR after public noticing of the Draft EIR, the EIR must be recirculated to give the public a meaningful opportunity for review. Significant new information is defined as 1) a new significant environmental impact, 2) a substantial increase in the severity of an environmental impact requiring new mitigation, or 3) a feasible project alternative or mitigation measure considerably different from those previously analyzed that would clearly reduce environmental impacts. Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

This Final EIR includes the following modifications to the Carnegie SVRA RMA Program Draft EIR:

- Text changes or minor additions to provide clarity to the analysis, make minor text corrections, or fix grammatical or typographic errors.
- Wording changes or additions to mitigation measures that are not based on a change in potential impacts but are to clarify the measure or make it consistent with agency recommendations.

These revisions do not constitute significant changes in the project description, environmental setting, conclusions of the environmental analysis, or in the mitigation requirements incorporated into the project or otherwise provide significant new information that would require recirculation of the Draft EIR pursuant to CEQA Guidelines section 15088.5.

1.3 FINAL EIR ORGANIZATION

The Final EIR for the Carnegie RMA P Project is as organized as follows:

- Chapter 1 Introduction.** This chapter explains the contents of a Final EIR and the environmental review process for the Carnegie SVRA RMA Program.
- Chapter 2 Public Comment on Draft EIR.** This chapter contains copies of the comment letters received on the Draft EIR during the public review period. The comment letters have been individually numbered. A list of those who commented is provided at the front of the chapter.

- Chapter 3 Responses to Draft EIR Comments.** This chapter provides the written comments received on the Draft EIR and provides a written response to each comment raising a significant environmental issue submitted on the Draft EIR.
- Chapter 4 Errata and Revisions.** This chapter includes the changes to the Draft EIR needed to respond to comments and clarify or amplify the information provided in the Draft EIR and respond to agency recommendations.

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CHAPTER 2 PUBLIC COMMENT ON DRAFT EIR

This chapter contains written comments received on or related to the Draft EIR during the 45-day public review period from January 23 through March 10, 2026. Three comment letters were received during the Draft EIR review period, including one letter from one state agency, two organizations, and two individuals. Each commenter was assigned an alphanumeric identification code (i.e., O.1, O.2, etc.), and each specific comment was assigned a number.

Summary of Public Comments on the Draft EIR		
ID	Commenter	Date
Government Agencies		
A.1	California Department of Fish and Wildlife	3/6/2026
Organizations		
O.1	Blue Ribbon Coalition	3/10/2026
O.2	Cal4Wheel Drive Association	3/10/2026
Individuals		
I.1	Mead, Diana	2/10/2026
I.2	Vandeman, Mike	1/23/2026

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STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
wildlife.ca.gov

March 6, 2026

Clint Elsholz, District Superintendent
California Department of Parks and Recreation
Diablo Range District
15751 Tesla Road
Livermore, CA 94550
Clinton.Elsholz@parks.ca.gov

Subject: Carnegie State Vehicular Recreation Area Resource Management Area Program, Draft Environmental Impact Report, SCH No. 2023020424, Alameda and San Joaquin County

Dear Clint Elsholz:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a draft Environmental Impact Report (EIR) from the California Department of Parks and Recreation (Lead Agency) for the Carnegie State Vehicular Recreation Area Resource Management Area Program (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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REGULATORY AUTHORITY

California Endangered Species Act

Please be advised that CDFW recommends obtaining a CESA Incidental Take Permit (ITP) if the Project has the potential to result in “take” of plants or animals listed under CESA, either during construction or over the life of the Project. Issuance of a CESA ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA ITP.

Lake or Streambed Alteration

Pursuant to Fish and Game Code section 1600 et seq., an LSA notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian; or deposit or dispose of material where it may pass into a river, lake or stream. The Project proponent should submit a 1602 notification covering all activities subject to Fish and Game Code 1602 authority. CDFW will consider the CEQA document for the Project and may issue an LSA Agreement. CDFW may not execute the Final LSA Agreement (or ITP) until it has complied with CEQA as a Responsible Agency.

Fully Protected Species

Fully protected species, such as white-tailed kite (*Elanus leucurus*) and golden eagle (*Aquila chrysaetos*), may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows. The take is for necessary scientific research, efforts to recover a fully protected, endangered, or threatened species, live capture and relocation of a bird species for the protection of livestock, or if they are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515). Specified types of infrastructure Projects may be eligible for an ITP for unavoidable impacts to fully protected species if certain conditions are met (Fish & G. Code §2081.15). Project proponents should consult with CDFW early in the Project planning process.

Raptors and Other Nesting Birds

CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds of prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

PROJECT DESCRIPTION SUMMARY

Proponent: California Department of Parks and Recreation

Objective: The objective of the Resource Management Area (RMA) Program is to support responsible stewardship of the land by managing off-highway vehicle (OHV) use while maintaining OHV recreational opportunities for visitors of Carnegie State Vehicular Recreation Area (SRVA). The RMA Program allows control of sediment loss and erosion by reducing trail density, increasing vegetation cover, building and maintaining sustainable trails, limiting most OHV recreation to designated trails, and enforcing trails-only riding where designated.

The purpose of the Project is to establish new RMAs on the remaining 773 acres of unfenced distributed riding and trails-only riding areas in the SVRA hills and provide ongoing

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maintenance activities for the new and existing RMAs. Newly created RMAs comprise 167 acres of fenced distributed riding area and 606 acres of trails-only riding area. This will result in a net change of 200 acres of distributed riding area being converted to trails-only riding areas. With the proposed RMA Program project, the entirety of the 1,227-acre hillside riding area will be managed as RMAs.

Primary Project activities include installation of boundary fencing with gates at entry points, placement of signage, landform grading to remove unauthorized or unsustainable trails, hillside rehabilitation by adding soils to bring incised trails or eroded slope contours up to grade, cut and fill, discing, grading, compaction, hydroseeding, fencing, new temporary road creation and removal, new or redesigned trail construction, erosion control and erosion repair, revegetation, trail inspections and evaluations, and trail maintenance.

Location: Carnegie SRVA is located in the Diablo Range mountains of unincorporated eastern Alameda and western San Joaquin counties, approximately 15 miles east of the City of Livermore and 12 miles west of the City of Tracy. Lawrence Livermore National Laboratory property is to the north. Open space and rural residential areas (i.e., ranchland) surround the SVRA to the west and south. The entrance to the SVRA is off Coral Hollow Road, which becomes Tesla Road in Alameda County. The SVRA comprises 1,520 acres. The GPS coordinates for the administrative offices is Latitude 37.63738, -121.58920.

Timeframe: New RMAs and associated rehabilitation projects will be gradually implemented over an approximately 10-year time period. One to three RMAs are expected to be implemented each year.

ENVIRONMENTAL SETTING

According to Biogeographic Information and Observation System (BIOS) records, the Project site contains positive detections of several special-status species and has the potential to support numerous special-status species and their associated habitat. Species that can be considered to be endangered, rare or threatened as defined in CEQA Guidelines section 15380, with potential to occur on-site include, but are not limited to:

Scientific Name	Common Name	Status
<i>Amsinckia grandiflora</i>	Large-flowered fiddleneck	State rank S2, CRPR ² 1B.2
<i>Ambystoma californiense</i>	California tiger salamander	CESA listed as threatened; Central California Distinct Population Segment ESA listed as threatened
<i>Ammodramus savannahrum</i>	Grasshopper sparrow	California SSC
<i>Anniella pulchra</i>	Northern California legless lizard	SSC
<i>Aquila chrysaetos</i>	Golden eagle	California Fully Protected species; Bald and Golden Eagle Protection Act
<i>Arizona elegans occidentalis</i>	California glossy snake	SSC
<i>Athene cunicularia</i>	Burrowing owl	SSC
<i>Blepharizonia plumosa</i>	Big tarplant	S2, CRPR 1B.1
<i>Bombus crotchii</i>	Crotch's bumble bee	CESA candidate endangered

² CRPR rank definitions are available in CDFW's *Special Vascular Plants, Bryophytes, and Lichens List* (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109383&inline>) and on the California Native Plant Society website (<https://www.cnps.org/rare-plants>).

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Scientific Name	Common Name	Status
<i>Buteo swainsoni</i>	Swainson's hawk	CESA listed as threatened
<i>Campanula exigua</i>	Chaparall harebell	S2, CRPR 1B.2
<i>Caulanthus Lemmonii</i>	Lemmon's jewelflower	S3; CRPR 1B.2
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	SSC
<i>Delphinium californicum spp. Interius</i>	Hospital Canyon larkspur	S3, CRPR 1B.2
<i>Elanus leucurus</i>	White-tailed kite	California Fully Protected species
<i>Emys marmorata</i>	western pond turtle	SSC
<i>Eschscholzia rhombipetala</i>	Diamond-petaled California poppy	S1, CRPR 1B.1
<i>Hesperolinon breweri</i>	Brewer's western flax	S2, CRPR 1B.2
<i>Lanius ludovicianus</i>	Loggerhead shrike	SSC
<i>Madia radiata</i>	Showy golden madia	S3, CRPR 1B.1
<i>Masticophis flagellum ruddocki</i>	San Joaquin coachwhip	SSC
<i>Masticophis laterallus eruyxanthus</i>	Alameda whipsnake	CESA listed as threatened, ESA listed as threatened
<i>Phrynosoma blainvilli</i>	Coast horned lizard	SSC
<i>Puma concolor</i>	Mountain lion	CESA listed as threatened
<i>Rana boylei</i>	Foothill yellow-legged frog (west/Central coast clade)	CESA listed as endangered
<i>Rana draytonii</i>	California red-legged frog	SSC, ESA listed as threatened
<i>Spea hammonidii</i>	Western spadefoot toad	SSC, ESA proposed as threatened
<i>Taxidea taxus</i>	American badger	SSC
<i>Vulpes macrotis mutica</i>	San Joaquin kit fox	CESA listed as threatened; ESA listed as endangered

CRPR = California Rare Plant Rank; ESA = Endangered Species Act, FE = Federally Endangered; FT = Federally Threatened; SE = State Endangered; ST = State Threatened; SFP = State Fully Protected; SSC = State Species of Special Concern

California Native Plant Society (CNPS) Plant Ranks:

- 1A = Presumed extinct in California; and
- 1B = Rare, Threatened, or Endangered in California and Elsewhere.

CNPS Threat Ranks:

- 0.1-Seriously threatened in California (over 80 percent of occurrences threatened / high degree and immediacy of threat); and

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- 0.2-Moderately threatened in California (20-80 percent occurrences threatened / moderate degree and immediacy of threat).

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the California Department of Parks and Recreation in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

I. Project Description and Related Impact Shortcoming

COMMENT 1: Crotch's Bumble Bee:

Mitigation Measure BIO-2A: Pre-construction Survey for Crotch's Bumble Bee

The Carnegie SVRA area is within the current known range of the Crotch's bumble bee. Potential adverse effects to this species from vegetation removal, clearing, grubbing, and grading work on-site may include direct mortality through crushing or filling of active bee colonies and hibernating bee cavities, reduced reproductive success, loss of suitable breeding and foraging habitats, and loss of native vegetation that may support essential foraging habitat.

CDFW recommends that the following elements are added to the mitigation measure in a revised draft EIR to be more protective of Crotch's bumble bee.

CDFW recommends changing the mitigation measure to state that surveys shall be conducted each year Project activities occur. The mitigation measure states: "If the pre-construction surveys do not identify Crotch's bumble bee nests, no additional surveys and mitigation are required." Bumble bees can move nest sites each year so one year of surveys may not be sufficient to locate nests and reduce impacts to a less-than-significant level.

CDFW recommends planning vegetation/habitat removal such that impacts are planned to be divided into a sufficient number of units so that the whole of the habitat is not impacted in the same year. This will allow refuge, habitat, and floral resources to remain during work activities.

COMMENT 2: Mitigation Measure BIO-3A and 3c: Protection of Special-Status Amphibians and Reptiles

Western Pond Turtle

Western pond turtle are known to nest in the spring or early summer within 100 meters of a water body, although nest sites as far away as 500 meters have also been reported. Additionally, western pond turtle can spend up to 200 days away from water, especially since ponds tend to dry down during summer months.

CDFW recommends adding the following information to a revised draft EIR for protection of western pond turtle. If nesting habitat for western pond turtle is found at a Project site, exclusion fencing shall be placed prior to egg-laying season (March through August). Exclusion fencing shall be designed to encompass the work site and maintained weekly until construction activities at the work site are completed. If a western pond turtle nest is found, a 100-foot no disturbance buffer shall be demarcated around the nest, and no work shall occur until the hatchlings have dispersed.

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Alameda Whipsnake

BIO-3a and 3b discuss habitat assessment, flagging habitat features, conducting a pre-construction survey prior to ground-disturbing activities, monitoring ground-disturbing work if species are encountered in or near the work site during the habitat assessment or survey, adjusting or postponing work if species are found during work, allowing them to leave of their own volition, exclusion fencing, and rescheduling working times and locations. However, these actions are not specific to the behaviors of Alameda whipsnake to fully avoid or minimize impacts to them. CDFW recommends the following information is added to a revised draft EIR to fully minimize impacts to Alameda whipsnake to a less-than-significant level:

- Implement temperature restrictions conducive to Alameda whipsnake movement for all ground-disturbing work within suitable habitat to allow for snake dispersal. For vegetation removal work in Alameda whipsnake habitat, CDFW recommends that work occur during winter months, where feasible, when snakes are less active (Alvarez, 2021);
- A qualified biologist should survey ahead of all manual and mechanical work in suitable habitat areas;
- Work crews should be advised on where to broadcast wood chips to avoid potential Alameda whipsnake refugia such as rocky outcrops and mammal burrows, in addition to limiting chip depth in suitable habitat to prevent disruption of Alameda whipsnake thermoregulation;
- CDFW recommends that these Alameda whipsnake habitat types (annual grassland, oak savanna, oak-bay woodland, mixed evergreen forest, riparian and areas with rock outcrop features) be mapped on the Project sites and Project impacts such as permanent destruction of habitat and permanent new roads and ongoing impacts from roadways be identified in a revised EIR; and
- The EIR should also address impacts to the Alameda whipsnake from fragmentation of habitat, permanent loss of habitat and impacts from vehicle traffic on roadways.

CDFW recommends for this Project, that the Project mitigate for these impacts to Alameda whipsnake and their habitats to a less-than-significant level requiring compensatory mitigation in the form of conserved lands at minimum 5:1 (mitigation to impact) ratio for new roadways, a minimum 3:1 ratio for all other permanent impacts and a minimum of 1.25:1 ratio for temporary impacts. Conserved lands should be protected in perpetuity under a legal instrument such as a conservation easement and be managed in perpetuity through an endowment with an appointed land manager. CDFW recommends that priority for conserved lands be given to on-site locations. To ensure significant impacts are adequately mitigated to a less-than-significant level, feasible mitigation measures described above should be incorporated as enforceable conditions into the final CEQA document for the Project.

COMMENT 3: Mitigation Measure BIO-5 Special-status and Roosting Bat Protection

CDFW recommends that the following elements are added to the mitigation measure in a revised draft EIR to be more protective of special-status bats.

Bat Colony Avoidance. If bat colonies are observed at the Project site at any time, all Project activities stop until the qualified bat biologist develops a bat avoidance plan to be implemented at the Project site. Once the plan is implemented, Project activities may recommence. If a maternity colony is found, there shall be no disturbance to the roost site until the young become volant (after August 31) because they are unable to fly. If a

maternal colony is found after construction activities have begun, a no-work buffer area shall be established around the maternal roost.

Tree Removal Methodology. Any trees containing bat roosting habitat (e.g. cavities, crevices, deep bark fissures) shall be marked and removed using a two-day phased method as follows: On day one, under the supervision of a qualified biologist, all limbs not containing bat roosting habitat shall be removed using chainsaws only. The next day, the rest of the tree shall be removed.

All trees shall be removed during seasonal periods of bat activity: Prior to maternity season – from approximately March 1 (or when night temperatures are above 45°F and when rains have ceased) through April 15 (when females begin to give birth to young); and prior to winter torpor – from September 1 (when young bats are self-sufficiently volant) until about October 15 (before night temperatures fall below 45°F and rains begin). If tree removal must occur outside of these timeframes, a qualified biologist shall survey the trees to the extent feasible to determine if maternity colonies or winter torpor bats are present. If present, the tree shall not be removed until females have given birth to young and when young bats are self-sufficiently volant, as determined by a qualified biologist.

COMMENT 4: Mitigation Measure BIO-7: American Badger Protection.

CDFW recommends adding the following information into a revised draft EIR to fully avoid and minimize impacts to American badger.

CDFW recommends conducting preconstruction surveys for American badger no more than 7 instead of 14 days before ground-disturbing activities. Additionally, besides searching the work site for badger dens, the qualified biologist should also search for burrows, diggings, and other signs of activity. If a burrow/den is found, a survey should be performed daily prior to beginning ground-disturbing work. Pre-construction surveys should be repeated as necessary if ground-disturbing activities are delayed or postponed for more than seven days. If burrows or dens are observed within the Project area and within 100 feet of the Project footprint, the qualified biologist should monitor them for a minimum of 3 nights. If unoccupied, the den should be excavated by hand. If the burrow or den is determined to be active, a 100-foot no-work buffer should be established and monitored for 3 more nights to determine if it is a natal den. If it is a natal den, a 200-foot no-work buffer should be established around a natal den, and a 100-foot no-work pathway through suitable habitat should be established to ensure safe passage to and from the den around the work area. A qualified biologist should monitor the site during work to ensure breeding badgers are not impacted. Buffers shall be enlarged as necessary.

COMMENT 5: Mitigation Measure BIO-9: Replacement of Sensitive Natural Communities.

Special-status plants are often narrowly distributed endemic species. They are susceptible to habitat loss and habitat fragmentation resulting from development, vehicle and foot traffic, and introduction of non-native plant species. Therefore, there is high potential for the Project to have significant impacts to these species and their populations. To reduce impacts to CESA-listed plants to less-than-significant, CDFW recommends revising the draft EIR by adding the following language:

The Project shall complete two years of protocol-level botanical surveys and incorporate the results into a revised EIR. The botanical survey results shall follow CDFW's 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities, including, but not limited to, conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts such as altering off-site hydrological conditions where the above species may be present. Surveys conducted during drought conditions may not

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be acceptable. If the botanical surveys result in the detection of the above CESA listed plants that may be impacted by the Project, or the presence of these species is assumed, the Project applicant shall obtain a CESA ITP from CDFW prior to construction and comply with all requirements of the ITP. Surveys conducted during drought conditions may not be acceptable.

II. Editorial Comments and/or Suggestions

CDFW recommends adding the following measure to the revised draft EIR for the protection of wildlife:

Erosion Control Material Limitation. To minimize the risk of ensnaring snakes and other wildlife, Permittee shall not use erosion control materials containing synthetic (e.g., plastic or nylon) monofilament netting or cross joints in the netting that are bound/stitched. Geotextiles, fiber rolls, and other erosion control measures shall be made of loose-weave mesh, such as coconut (coir) fiber, or other products without welded or tight weaves. .

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

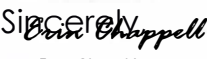
ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the draft EIR to assist California Department of Parks and Recreation in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Andrea Boertien, Environmental Scientist, at (707) 317-0388 or Andrea.Boertien@wildlife.ca.gov; or Sara Kern, Senior Environmental Scientist (Supervisory), at Sara.Kern@wildlife.ca.gov.

Sincerely,


Erin Chappell
Regional Manager
Bay Delta Region

ec: Office of Land Use and Climate Innovation SCH No. 2023020424
Melissa Farinha, CDFW Bay Delta Region – Melissa.Farinha@wildlife.ca.gov

Clint Elsholz, District Superintendent
California Department of Parks and Recreation
March 6, 2026
Page 9

REFERENCES

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BlueRibbon Coalition
P.O. Box 5449
Pocatello, ID 83202
208.237.1008
brc@sharetrails.org

Ben Burr, Executive Director
BlueRibbon Coalition
P.O. Box 5449
Pocatello, ID 83202

March 10, 2026

BlueRibbon Coalition appreciates the opportunity to provide comments regarding Carnegie State Vehicular Recreation Area and the proposed management considerations currently under review. BlueRibbon Coalition is a national nonprofit organization dedicated to protecting responsible recreation and access to public lands across the United States. For more than three decades, our members have worked with federal, state, and local agencies to ensure that outdoor recreation opportunities remain available for current and future generations. We represent a nationwide network of outdoor recreationists, clubs, businesses, and local communities who depend on continued access to public lands. BlueRibbon Coalition supports the No Action Alternative in this process because it maintains the recreational access and management framework that has successfully served the public at Carnegie SVRA for decades.

History and Purpose of Carnegie SVRA

Carnegie State Vehicular Recreation Area has a long history as a motorized recreation site that predates its management by the State of California. The area became a popular riding destination beginning in the mid twentieth century, and in the 1960s it operated as a privately owned motorcycle riding facility known as Carnegie Cycle Park. As off highway recreation continued to grow in popularity, the State of California recognized the importance of preserving this location for recreation. In 1979 the State purchased the property using funds from the Off Highway Vehicle Trust Fund specifically to establish a dedicated off highway recreation area.

O.1-1

The decision to acquire the property using OHV program funds is significant. The OHV program was created to ensure that recreation opportunities for off highway vehicle users would be protected and managed for the public. Carnegie SVRA was purchased and designated specifically as a recreation area for this purpose. As a result, the primary management objective for the site should remain the provision of high quality recreation opportunities for the public. Any proposal that would reduce or remove the recreational use that justified the original acquisition is inconsistent with the purpose for which these funds were used.

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This concern is especially important given the scarcity of true open riding areas in California. Currently open OHV riding areas account for less than one percent of public land in the state. These types of areas are extremely limited and are increasingly difficult to replace once they are lost. Facilities such as Carnegie SVRA play a critical role in providing legal, managed opportunities for riders, particularly for residents in the Bay Area and Central Valley who have limited nearby recreation options. Protecting these designated recreation areas is essential to maintaining the balance that the state intended when it established the OHV program.

Economic Contributions of OHV Recreation

Off highway vehicle recreation provides substantial economic benefits to California and to the communities that surround recreation areas such as Carnegie SVRA. Studies examining motorized recreation in California have found that off highway vehicle recreation contributes billions of dollars to the state economy each year and supports thousands of jobs. Economic analyses estimate that OHV recreation contributes approximately 7.7 billion dollars in annual economic activity statewide and supports businesses across multiple sectors including vehicle sales, repair services, lodging, restaurants, equipment retailers, fuel stations, and tourism related services.

These economic benefits are particularly important for rural communities and gateway towns that depend on recreation tourism. Visitors traveling to riding areas spend money locally on food, lodging, fuel, vehicle parts, and other supplies. This spending directly supports small businesses and employment in surrounding communities. State Vehicular Recreation Areas throughout California generate significant visitor spending, and recreation based tourism continues to be an important part of the outdoor recreation economy in the state.

O.1-2

Reducing access or limiting recreational use at established riding areas can have immediate and measurable economic consequences. Local businesses that rely on recreation tourism experience reduced visitation, seasonal jobs may be lost, and communities that depend on outdoor recreation can face economic uncertainty. Maintaining access to established recreation areas like Carnegie SVRA helps sustain a stable recreation economy that benefits both local communities and the broader state economy.

Recent Planning and Management Updates

Carnegie SVRA has already undergone a recent planning and management update. In 2024 the Department completed a major planning effort that evaluated management strategies and future improvements for the park. That process included environmental review, extensive analysis of resource conditions, and public participation.

O.1-3

Because such a comprehensive review was completed so recently, significant changes to the fundamental recreational use of the park so soon afterward would be premature. Management plans are intended to provide long term stability and direction. Revisiting major restrictions immediately following a comprehensive planning effort undermines the planning process and creates uncertainty for recreationists, businesses, and the public who rely on the park.

Best Available Science and Transparency

If restrictions such as converting open riding areas to trail only designations are being considered based on concerns related to soil degradation, erosion, or water quality impacts, those decisions should be supported by the best available science and transparent data. Management decisions that significantly alter recreational access should be based on clearly documented evidence that can be reviewed by the public.

If soil conditions, erosion rates, sediment transport, or water quality degradation are cited as justification for restrictions, the underlying data and analysis should be made publicly available. Providing that information allows stakeholders, researchers, and the public to review the methodology, understand the scope of the impacts, and evaluate whether the proposed management response is proportional to the identified issue.

O.1-4

Transparency in the use of scientific data is critical for maintaining public trust in land management decisions. When agencies clearly present the evidence used to support management actions, it strengthens confidence in the decision making process and helps ensure that policy changes are grounded in credible analysis rather than perception or anecdotal concerns.

Dispersed Camping

BRC believes that all users can and should be accommodated. This plan should ultimately identify reasonable standards for allowing dispersed camping. According to The Dyr, a camping app, camping has grown immensely since 2019. Public lands are needing more camping facilities than ever before as almost 50% of campers are new campers. The number of people who use public land to camp is only growing every year. The state of California needs to

O.1-5

strongly consider providing as many camping areas as possible as to not concentrate use in limited sites. Keeping trails open and areas open to riding allows more opportunities to camp. Management strategies should be exhausted before restrictions and closures of areas to any type of recreational use. Better facilities to address waste issues need to be created before any restrictions. BRC supports all recreational activities if done responsibly. The 2024 plan identifies options if there are adverse impacts. Those need to be used, rather than just closing acreage to open OHV use.

We are concerned that closing dispersed camping options will eventually lead to reservation systems which ultimately give advantage to upper-class users as oftentimes marginalized groups do not have the luxury of making reservations that far in advance.¹ Another issue is those who make reservations and don't show up, it takes away opportunities to utilize public lands from someone who otherwise would have used the camping spot. California State Parks should look at data of reservation system implementations to see how they affect various user groups before implementing any type of reservation system. According to a study on reservation systems in National Parks, "Results suggest that for each of the five campgrounds, those campers camping in sites that require reservations came from areas with higher median household incomes, on average."² The study also concludes that the online reservation systems cater to primarily white users. California should stop their proposals to limit free, primitive and dispersed camping as more and more research is showing that is discriminatory. We support allowing dispersed camping and believe it provides a valuable user experience that the state should be protecting. Research shows that having an experience in nature where no one else has been has many mental and physical health benefits. Restricting dispersed camping will hinder these benefits. Outdoor recreation has grown incredibly the last few years because the public is starting to recognize the value that enjoying nature brings to your life. In fact, NASA claims that human exploration is innate and what leads to discovery.³

O.1-5

Wealth Inequality

BRC strongly encourage the California State Parks to incorporate into their planning the findings of *The Slums of Aspen: Immigrants vs. the Environment in America's Eden* by Lisa Sun-Hee Park and David Pellow and *Billionaire Wilderness: The Ultra-Wealthy and the Remaking of the American West* by Justin Farrell. Both of these works document extensively how Western communities surrounded by public land are undergoing significant socioeconomic changes that

O.1-6

¹

https://www.researchgate.net/publication/359329284_Exclusionary_Effects_of_Campsite_Allocation_through_Reservations_in_US_National_Parks_Evidence_from_Mobile_Device_Location_Data

²

https://www.researchgate.net/publication/359329284_Exclusionary_Effects_of_Campsite_Allocation_through_Reservations_in_US_National_Parks_Evidence_from_Mobile_Device_Location_Data

³ <https://www.nasa.gov/feature/the-human-desire-for-exploration-leads-to-discovery>

result in skyrocketing housing costs, use of conservation and land-use restrictions to limit development, and displacement of the local middle and lower classes from Western Communities. Conservation policies and land-use restrictions are the primary tools that the ultra-rich use to disenfranchise the remaining American public from being able to access and enjoy the public benefits of public land. In many cases public lands become the private enclaves for the enjoyment of recreation pursuits and cultural values of the ultra wealthy.

We have been concerned to hear private property owners making the arguments for conservation that are the subject of critique in the works cited by Sun-Hee Park, Pellow, and Farrell. It is often the case when the ultra-wealthy colonize western communities that they use private property and conservation easements to create buffer zones that prevent public access to public lands. Given the land ownership patterns in these counties, it is very likely that privately developed land-use restrictions will inevitably result in decreased access to public lands by the public. When combined with the socioeconomic forces behind this trend, this loss of access will disproportionately impact those marginalized by poverty and inequality.

Consider this passage from *Billionaire Wilderness* where Justin Farrell describes how land conservation fueled the intense wealth inequality that is becoming increasingly characteristic of Colorado's gateway mountain communities:

But data reveal that this economic thinking is misguided, *especially in places where ultra-wealth and inequality collide with pervasive land conservation*. What this means is that the "rising tide lifts all boats" approach can have the effect of intensifying economic differences. More specifically, and following the same logic as earlier with the protection and production of wealth, I consider the effect of land conservation on which job sectors are growing or declining (that is, available jobs and total income), and as a result, the staggering decline of reasonably priced housing.

First, conservation has directly and indirectly intensified wealth inequality by making the area uniquely attractive to the ultra-wealthy, creating intense housing demand *and* land scarcity that has dramatically reshaped who lives in the community, and how people make their money. [...] As more and more ultra-wealthy people move to the area for natural amenities (for example, protected lands, abundant wildlife), it dramatically restructured the socioeconomic hierarchy - becoming both a cause, and a consequence, of conservation values. Conservation became a form of elite cultural currency, and conservation organizations benefited from the financial flow down, all while it became harder for middle- and lower-income people to survive there (pp. 96-97).

Farrell's work also documents how the ultra-wealthy commandeer local governments to the extent that these governments become vehicles for enacting their preferred policy preferences, which include highly restricting public access to public land. While we generally believe that land agencies should show deference to local communities, when those communities are captured by elitist economic interests and begin to advocate for policies that cut off the general public from publicly managed land, then it is imperative for the state government to check and balance the misguided use of local power.

O.1-6

Conclusion

We would like to close by saying we support "shared use". As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and nonmotorized recreation use often overlap as OHV's often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs. BRC supports the no action alternative.

O.1-7

BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address:

Ben Burr
BlueRibbon Coalition
P.O. Box 5449
Pocatello, ID 83202
brmedia@sharetrails.org

O.1-8

Sincerely,



Ben Burr
Executive Director
BlueRibbon Coalition



Simone Griffin
Policy Director
BlueRibbon Coalition

O.2 Cal4Wheel Drive Association

From: [Rose Winn](#)
To: [Carnegie RMA comments](#); [Barros, Jonathan@Parks](#); [Perez, Vicki@Parks](#)
Subject: Carnegie SVRA RMA Program Draft EIR: Cal4Wheel Comment Submission
Date: Tuesday, March 10, 2026 5:03:40 PM
Attachments: [Outlook-bvwgx0kc.png](#)
[C4WDA - Carnegie SVRA 2026 RMA Program - Draft EIR Public Comment.pdf](#)

Dear Carnegie SVRA Planning Team,

California Four Wheel Drive Association (Cal4Wheel) is writing to provide the attached comment letter for the Draft EIR for the Carnegie SVRA Resource Management Area (RMA) Program.

Cal4Wheel would like to be considered an interested public for the RMA and EIR. Information can be sent to the following address and email address:

Rose Winn
California Four Wheel Drive Association
8120 36th Avenue
Sacramento, CA 95824
rwinn@cal4nrc.com

Thank you,
Rose

Rose Winn | Natural Resources Consultant

California Four Wheel Drive Association
559.862.6382 | rwinn@cal4nrc.com
cal4wheel.com





March 10, 2026

California State Parks OHV Division

Submitted via email to: OHMVR.EnvComp@parks.ca.gov

RE: Public Comment on the Carnegie SVRA Recreation Management Plan Draft Environmental Impact Report

Dear Carnegie SVRA Planning Team,

California Four Wheel Drive Association (Cal4Wheel) respectfully submits the following comments on the **Carnegie State Vehicular Recreation Area (SVRA) Recreation Management Plan (RMP) Draft Environmental Impact Report (Draft EIR)**. Cal4Wheel represents more than 3,500 members across California who actively recreate on public lands using off-highway vehicles (OHVs). Many of our members live within the greater San Francisco Bay Area and Central Valley regions and rely on Carnegie SVRA as one of the few remaining motorized recreation areas within practical driving distance of these highly populated regions. This letter does not supplant the rights of individual Cal4Wheel members, clubs, or partner organizations to submit additional comments. California State Parks should fully consider and respond to all substantive comments submitted during the public review process.

Cal4Wheel has a long history of partnership with the California Department of Parks and Recreation and the Off-Highway Motor Vehicle Recreation (OHMVR) Division through volunteer service, stewardship activities, safety education, and collaborative planning processes. Our members utilize Carnegie SVRA for recreation, organized club events, safety training, and conservation stewardship. Many Cal4Wheel members have concrete, definite, and immediate plans to continue recreating at Carnegie SVRA throughout the future. Due to this longstanding connection to the park and the statutory purpose of the SVRA system, Cal4Wheel has a direct and substantial interest in ensuring that the final Recreation Management Plan and associated environmental review fully comply with the mandates of California law while protecting and expanding opportunities for responsible motorized recreation.

O.2-1

Legislative Mandate for SVRAs Requires Prioritization of Motorized Recreation

Carnegie SVRA exists for a fundamentally different purpose than most units within the California State Park system. While the broader state park system prioritizes preservation and passive recreation, **State Vehicular Recreation Areas are legislatively designated to provide motorized recreation opportunities**. California Public Resources Code establishes this mandate clearly:

- **PRC §5090.02** states that the purpose of the OHMVR program is to provide “opportunities for off-highway motor vehicle recreation while protecting natural resources.”
- **PRC §5090.35(a)** directs the Department to manage SVRAs in a manner that provides for high-quality OHV recreation opportunities.
- **PRC §5090.42** further directs the OHMVR Division to ensure that lands acquired or designated for the program are managed specifically for motorized recreation.

O.2-2



The statutory language is explicit: **motorized recreation is not merely an allowed use within SVRAs—it is the primary purpose of these areas.**

The Draft EIR repeatedly frames OHV recreation as a management concern rather than as the central purpose of the park. This framing reverses the statutory hierarchy established by the OHMVR program and risks undermining the legislative intent that created the SVRA system. As currently written, the Draft EIR does not sufficiently demonstrate that the Recreation Management Plan prioritizes expansion, improvement, and long-term sustainability of OHV recreation opportunities at Carnegie.

The final RMP must clearly articulate that **Carnegie SVRA is managed first and foremost to provide high-quality motorized recreation opportunities**, while natural resource protection measures are implemented in a manner that supports... not replaces... that primary mission.

O.2-2

Regional Deficit of Motorized Recreation Opportunities

The importance of Carnegie SVRA cannot be understood without considering the broader regional context. The San Francisco Bay Area and surrounding metropolitan regions collectively represent **one of the largest concentrations of population in the United States**, yet opportunities for motorized recreation in this region are extremely limited. Within several hours of the Bay Area, the number of OHV recreation areas is remarkably small. Carnegie SVRA serves as one of the **only dedicated OHV riding areas accessible to millions of residents.**

Across California:

- The State Park system encompasses **approximately 1.59 million acres across more than 280 units.**
- Only **nine State Vehicular Recreation Areas** exist statewide.
- These SVRAs collectively represent **less than 9 percent of the total state park acreage.**

When viewed in the context of all public lands within California - including federal lands managed by the Bureau of Land Management and the U.S. Forest Service - **the acreage available specifically for OHV recreation represents well under 1% of total public lands** (California Department of Parks and Recreation, 2024).

In contrast, tens of millions of acres of public land in California are closed to motorized access through wilderness designation, wildlife refuges, national parks, and other restrictive land classifications. The scarcity of motorized recreation areas near major population centers makes Carnegie SVRA uniquely valuable. Management decisions that reduce riding opportunities within this park therefore have disproportionately large impacts on the public. **Rather than considering additional restrictions on motorized recreation, the Recreation Management Plan should focus on expanding access opportunities, improving trail connectivity, and enhancing riding experiences to meet the recreational needs of the region.**

O.2-3



Failure to Fully Evaluate Recreation Displacement Effects

The Draft EIR does not sufficiently analyze the **recreation displacement effects** that will result from reductions in available riding opportunities within Carnegie SVRA. When motorized recreation opportunities are restricted in designated riding areas, users are frequently displaced to other locations. This phenomenon is widely documented in recreation management research and can lead to unintended environmental impacts, including unauthorized trail creation and resource damage outside managed areas (Cordell et al., 2008). CEQA requires analysis of reasonably foreseeable indirect environmental effects (CEQA Guidelines §15358). If riding opportunities within Carnegie are reduced or constrained, riders will predictably seek alternative locations on nearby public lands where motorized recreation may not be authorized. This displacement will result in:

- Unauthorized trail creation on adjacent public lands
- Increased enforcement challenges
- Resource damage in unmanaged areas

Because these outcomes represent reasonably foreseeable physical environmental effects, they must be fully analyzed under CEQA. **The Draft EIR should be revised to include a comprehensive recreation displacement analysis, including mitigation strategies designed to ensure that Carnegie SVRA continues to provide sufficient riding opportunities to accommodate regional demand.**

O.2-4

Accessibility and Equity Considerations for Motorized Recreation

Motorized recreation plays a critical role in providing equitable access to public lands for individuals with mobility limitations. Many individuals with disabilities rely on OHVs as their primary means of accessing outdoor recreation opportunities. Limiting motorized access within SVRAs can therefore create disproportionate barriers for individuals who cannot access backcountry environments through non-motorized means. California law recognizes the importance of accessibility within public recreation areas. For example:

- **PRC §5070** requires state parks to ensure access for individuals with disabilities.
- Federal disability law similarly emphasizes equal access to outdoor recreation opportunities.

Because SVRAs provide one of the few forms of backcountry access available to individuals with mobility impairments, the Recreation Management Plan should explicitly recognize the **important accessibility benefits of OHV recreation**.

The Draft EIR should therefore incorporate accessibility considerations into the analysis of recreation alternatives and ensure that proposed management strategies do not disproportionately reduce access for mobility-limited individuals.

O.2-5

Inadequate Consideration of Economic Benefits of OHV Recreation

Outdoor recreation represents a major economic driver across the United States. According to the U.S. Bureau of Economic Analysis, outdoor recreation contributes more than \$454 billion annually to the

O.2-6



national economy and supports millions of jobs (BEA, 2023). Motorized recreation represents a substantial portion of this activity. The U.S. off-highway vehicle market alone generates billions of dollars in annual economic activity through equipment purchases, tourism spending, lodging, fuel sales, and vehicle maintenance.

Carnegie SVRA contributes directly to the economies of nearby communities through visitation, tourism, and recreation-related spending. However, the Draft EIR contains limited discussion of these economic contributions. CEQA requires that social and economic impacts be analyzed when they contribute to physical environmental changes (CEQA Guidelines §15131). If reductions in recreation opportunities reduce visitation, resulting economic changes may produce secondary environmental effects such as land-use changes or economic decline in nearby communities.

The Draft EIR should therefore incorporate a more comprehensive analysis of the economic contributions of Carnegie SVRA, including the role the park plays in supporting local recreation-based economies.

O.2-6

Need for Proactive Trail System Expansion and Recreation Infrastructure Improvements

The Recreation Management Plan represents an opportunity not merely to maintain the existing recreation experience at Carnegie SVRA, but to improve it. Modern OHV recreation management emphasizes well-designed trail systems, clear route designation, sustainable trail construction, and ongoing maintenance. These strategies simultaneously improve rider experience and reduce environmental impacts.

Research has demonstrated that purpose-built trail systems significantly reduce resource damage by directing recreation activity onto durable surfaces and away from sensitive habitats (Marion & Wimpey, 2017). The final Recreation Management Plan should therefore include:

- Development of additional designated trail mileage where feasible
- Improved trail connectivity across the park
- Sustainable trail design and maintenance standards
- Expanded staging areas and recreation infrastructure
- Ongoing monitoring and adaptive management

Investing in a well-planned trail system will allow Carnegie SVRA to accommodate growing recreation demand while protecting natural resources.

O.2-7

Required Revisions to the Draft EIR

To ensure compliance with statutory mandates and CEQA requirements, Cal4Wheel recommends that California State Parks revise the Draft EIR to incorporate the following changes:

1. **Explicitly reaffirm the legislative mandate that SVRAs prioritize motorized recreation opportunities.**
2. **Conduct a comprehensive recreation displacement analysis** evaluating potential environmental impacts if riding opportunities are reduced.

O.2-8



3. **Incorporate accessibility considerations** to ensure equitable access for individuals with disabilities who rely on motorized recreation.
4. **Expand economic analysis** to fully evaluate the regional economic benefits of Carnegie SVRA.
5. **Commit to expansion and improvement of the trail system**, including sustainable trail design and additional designated routes where appropriate.
6. **Ensure that management alternatives maximize OHV recreation opportunities while balancing resource protection.**
7. **Adopt adaptive management strategies** that allow recreation opportunities to expand as monitoring data demonstrate sustainable resource conditions.

O.2-8

Closing

Carnegie State Vehicular Recreation Area plays an irreplaceable role in providing motorized recreation opportunities for millions of Californians, particularly residents of the San Francisco Bay Area and surrounding urban regions. SVRAs exist specifically to provide motorized recreation opportunities, thus management decisions affecting these areas must be guided by the legislative mandate established in the California Public Resources Code. The Recreation Management Plan therefore represents an opportunity to strengthen Carnegie SVRA's role as a premier motorized recreation destination while ensuring responsible stewardship of the park's natural resources.

Cal4Wheel urges California State Parks to revise the Draft EIR to ensure that the final plan prioritizes motorized recreation opportunities, expands sustainable trail systems, and fully evaluates the broader regional importance of Carnegie SVRA.

O.2-9

California Four Wheel Drive Association would like to be considered an interested public for the RMA Program EIR. Information can be sent to the following address and email address:

Rose Winn
California Four Wheel Drive Association
8120 36th Avenue
Sacramento, CA 95824
rwinn@cal4nrc.com

Sincerely,

Rose Winn
Natural Resources Consultant
California Four Wheel Drive Association



References

- Bureau of Economic Analysis. (2023). *Outdoor recreation satellite account*. U.S. Department of Commerce.
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- California Public Resources Code §§ 5001–5090.
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- Marion, J. L., & Wimpey, J. (2017). Assessing the effectiveness of trail management actions. *Journal of Environmental Management*.

I.1 Diana Mead

From: diana@western-scientific.com
To: [Carnegie RMA comments](#)
Cc: diana@western-scientific.com; [Ed Stovin](#)
Subject: Comment Letter
Date: Tuesday, February 10, 2026 3:01:12 PM

DPR, Diablo Range District
April Marson
15751 Tesla Road
Livermore, CA 94550

Diana Mead, Concord, CA
California Outdoor Recreation Foundation Board Member
Personal and recreational interest in Carnegie SVRA

I am commenting on the Carnegie State Vehicular Recreation Area (SVRA) Resource Management Area (RMA) Program Draft EIR.

Specifically: 3.1 Goals as Defined by the Standard

Component 2. To meet the criteria of sustainable long-term use, soil loss must not exceed restorability (ie. the ability to be restored). PRC5090.02 (c)(4) requires that when OHV recreation areas or trails or portions thereof cannot be maintained to appropriate established standard for sustained long-term use, they shall be closed to use and be repaired to prevent accelerated erosion. Those areas shall remain closed until they can be managed within the soil loss standard or shall be closed and restored. Restoration of these areas means that upon closure of the unit or any portion thereof, the return of land to the contours, the plant communities, and the plant covers comparable to those on surrounding lands or at least those which existed prior to OHV use, as defined PRC5090.11 and 14CCR4970.01

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I propose the addition: Should the unit need to be closed and the land either managed or restored, ie. returned to pre OHV use, a reroute of the unit will be submitted to ensure continuity of the adjoining units.

The objective of our DPR, State Parks, OHMVR Division, should always promote sustainable and sustained access. To simply close, and end access to a trail will be perceived as “overkill” to the OHV visitors to Carnegie SVRA. This is especially true if it is only a small portion of the trail and the entire trail is closed.

Thank you for your consideration.

**Diana Mead
5231 Heritage Drive, Concord, CA 94521
925-639-4581
diana@western-scientific.com**

12 Mike Vandeman

From: [Mike Vandeman](#)
To: [Carnegie RMA comments](#)
Subject: Mountain Biking and Trail-Building Destroy Wildlife Habitat!
Date: Friday, January 23, 2026 5:01:18 PM

The same comments apply to ORVs as to mountain bikes: they are both off-road vehicles. There is no good reason to allow any machines (except wheelchairs) on any unpaved trails.

The major harm that mountain biking does is that it greatly extends the human footprint (distance that one can travel) in wildlife habitat. E-bikes multiply that footprint even more. Neither should be allowed on any unpaved trail. Wildlife, if they are to survive, MUST receive top priority!

What were you thinking??? Mountain biking and trail-building destroy wildlife habitat! Mountain biking is environmentally, socially, and medically destructive! There is no good reason to allow bicycles on any unpaved trail!

Bicycles should not be allowed in any natural area. They are inanimate objects and have no rights. There is also no right to mountain bike. That was settled in federal court in 1996: <https://mjvande.info/mtb10.htm> . It's dishonest of mountain bikers to say that they don't have access to trails closed to bikes. They have EXACTLY the same access as everyone else -- ON FOOT! Why isn't that good enough for mountain bikers? They are all capable of walking....

Why do mountain bikers always insist on creating illegal trails? It's simple: they ride so fast that they see almost nothing of what they are passing. Therefore, they quickly get bored with any given trail and want another and another, endlessly! (In other words, mountain biking is inherently boring!)

A favorite myth of mountain bikers is that mountain biking is no more harmful to wildlife, people, and the environment than hiking, and that science supports that view. Of course, it's not true. To settle the matter once and for all, I read all of the research they cited, and wrote a review of the research on mountain biking impacts (see <https://mjvande.info/scb7.htm>). I found that of the seven studies they cited, (1) all were written by mountain bikers, and (2) in every case, the authors misinterpreted their own data, in order to come to the conclusion that they favored. They also studiously avoided mentioning another scientific study (Wisdom et al) which did not favor mountain biking, and came to the opposite conclusions.

I.2-1

Mountain bikers also love to build new trails - legally or illegally. Of course, trail-building destroys wildlife habitat - not just in the trail bed, but in a wide swath to both sides of the trail! E.g. grizzlies can hear a human from one mile away, and smell us from 5 miles away. Thus, a 10-mile trail represents 100 square miles of destroyed or degraded habitat, that animals are inhibited from using. Mountain biking, trail building, and trail maintenance all increase the number of people in the park, thereby preventing the animals' full use of their habitat. See <https://mjvande.info/scb9.htm> for details.

Mountain biking accelerates erosion, creates V-shaped ruts, kills small animals and plants on and next to the trail, drives wildlife and other trail users out of the area, and, worst of all, teaches kids that the rough treatment of nature is okay (it's NOT!). What's good about THAT?

To see exactly what harm mountain biking does to the land, watch this 5-minute video: <http://vimeo.com/48784297>.

In addition to all of this, it is extremely dangerous: https://mjvande.info/mtb_dangerous.htm .

The latest craze among mountain bikers is the creation of "pump tracks" (bike parks). They are alleged to teach bicycling skills, but what they actually teach are "skills" (skidding, jumping ("getting air"), racing, etc.) that are appropriate nowhere! If you believe that these "skills" won't be practiced throughout the rest of the park and in all other parks, I have a bridge I'd like to sell you! ...

For more information: <https://mjvande.info/mtbfaq.htm> .

The common thread among those who want more recreation in our parks is total ignorance about and disinterest in the wildlife whose homes these parks are. Yes, if humans are the only beings that matter, it is simply a conflict among humans (but even then, allowing bikes on trails harms the MAJORITY of park users -- hikers and equestrians -- who can no longer safely and peacefully enjoy their parks).

The parks aren't gymnasiums or racetracks or even human playgrounds. They are WILDLIFE HABITAT, which is precisely why they are attractive to humans. Activities such as mountain biking, that destroy habitat, violate the charter of the parks.

Even kayaking and rafting, which give humans access to the entirety of a water body, prevent the wildlife that live there from making full use of their habitat, and should not be allowed. Of course those who think that only humans matter won't understand what I am talking about -- an indication of the sad state of our culture and educational system.

Mike Vandeman, Ph.D.

--

Machine-Free Trails Association

I am working on creating wildlife habitat that is off-limits to humans ("pure habitat"). Want to help? (I spent the previous 8 years fighting auto dependence and road construction.)

Wildlife must be given top priority, because they can't protect themselves from us.

An abortion is a MEDICAL PROCEDURE! Interfering with abortions is practicing medicine without a license!

Please don't put a cell phone next to any part of your body that you are fond of!

Stop obeying dictators and incompetent leaders from this time forward! Please share this message as widely as possible!

Are you still driving? Why?????

Have you noticed how motor vehicle use has decreased, since global warming was discovered? Me, neither!

<https://mjvande.info>

To not receive email from me, just reply and ask to be removed.

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CHAPTER 3 RESPONSES TO COMMENTS ON THE DRAFT EIR

This chapter provides a written response by DPR, as State Lead Agency for the project, to each comment raising a significant environmental issue submitted on the Draft EIR. A brief summary of each comment is provided for reference. Each comment letter is presented in Chapter 2 and should be referred to for viewing the full text of the comment.

3.1 GOVERNMENT AGENCIES

3.1.1 California Department of Fish and Wildlife

Comment A.1-1:

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Id., § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

Response to Comment A.1-1:

DPR acknowledges CDFW's role as California's Trustee Agency for fish and wildlife resources and as a Responsible Agency under CEQA.

Comment A.1-2:

REGULATORY AUTHORITY

California Endangered Species Act

Please be advised that CDFW recommends obtaining a CESA Incidental Take Permit (ITP) if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Issuance of a CESA ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA ITP.

Lake or Streambed Alteration

Pursuant to Fish and Game Code section 1600 et seq., an LSA notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian; or deposit or dispose of material where it may pass into a river, lake or stream. The Project proponent should submit a 1602 notification covering all activities subject to Fish and Game Code 1602 authority. CDFW will consider the CEQA document for the Project and may issue an LSA Agreement. CDFW may not execute the Final LSA Agreement (or ITP) until it has complied with CEQA as a Responsible Agency.

Fully Protected Species

Fully protected species, such as white-tailed kite (*Elanus leucurus*) and golden eagle (*Aquila chrysaetos*), may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows. The take is for necessary scientific research, efforts to recover a fully protected, endangered, or threatened species, live capture and relocation of a bird species for the protection of livestock, or if they are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515). Specified types of infrastructure Projects may be eligible for an ITP for unavoidable impacts to fully protected species if certain conditions are met (Fish & G. Code §2081.15). Project proponents should consult with CDFW early in the Project planning process.

Raptors and Other Nesting Birds

CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds of prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

Response to Comment A.1-2:

The proposed RMA Program would avoid take of special-status plants and animals, including species listed under CESA and fully protected species, by implementing BMPs and SPRs incorporated into the project (EIR Appendix B), as well as Mitigation Measures BIO-1 through BIO-8. DPR would submit an LSA Notification if any RMA Program activity may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian; or deposit or dispose of material where it may pass into a river, lake or stream, consistent with Mitigation Measure BIO-10: Protection of Jurisdictional Waters and Habitats. The proposed RMA Program would avoid disturbance or destruction of active nest sites or the unauthorized take of birds with implementation of SPRs incorporated into the project and Mitigation Measure BIO-4: Burrowing Owl Protection.

Comment A.1-3:

PROJECT DESCRIPTION SUMMARY

Proponent: California Department of Parks and Recreation

Objective: The objective of the Resource Management Area (RMA) Program is to support responsible stewardship of the land by managing off-highway vehicle (OHV) use while maintaining OHV recreational opportunities for visitors of Carnegie State Vehicular Recreation Area (SRVA). The RMA Program allows control of sediment loss and erosion by reducing trail

density, increasing vegetation cover, building and maintaining sustainable trails, limiting most OHV recreation to designated trails, and enforcing trails-only riding where designated.

The purpose of the Project is to establish new RMAs on the remaining 773 acres of unfenced distributed riding and trails-only riding areas in the SVRA hills and provide ongoing maintenance activities for the new and existing RMAs. Newly created RMAs comprise 167 acres of fenced distributed riding area and 606 acres of trails-only riding area. This will result in a net change of 200 acres of distributed riding area being converted to trails-only riding areas. With the proposed RMA Program project, the entirety of the 1,227-acre hillside riding area will be managed as RMAs.

Primary Project activities include installation of boundary fencing with gates at entry points, placement of signage, landform grading to remove unauthorized or unsustainable trails, hillside rehabilitation by adding soils to bring incised trails or eroded slope contours up to grade, cut and fill, disking, grading, compaction, hydroseeding, fencing, new temporary road creation and removal, new or redesigned trail construction, erosion control and erosion repair, revegetation, trail inspections and evaluations, and trail maintenance.

Location: Carnegie SRVA is located in the Diablo Range mountains of unincorporated eastern Alameda and western San Joaquin counties, approximately 15 miles east of the City of Livermore and 12 miles west of the City of Tracy. Lawrence Livermore National Laboratory property is to the north. Open space and rural residential areas (i.e., ranchland) surround the SVRA to the west and south. The entrance to the SVRA is off Corral Hollow Road, which becomes Tesla Road in Alameda County. The SVRA comprises 1,520 acres. The GPS coordinates for the administrative offices is Latitude 37.63738, -121.58920.

Timeframe: New RMAs and associated rehabilitation projects will be gradually implemented over an approximately 10-year time period. One to three RMAs are expected to be implemented each year.

Response to Comment A1-3:

This comment summarizes the objectives, location, and timeline of the proposed RMA Program. There is no specific comment on the proposed RMA Program or the analysis in the EIR, no further response is required.

Comment A.1-4:

ENVIRONMENTAL SETTING

According to Biogeographic Information and Observation System (BIOS) records, the Project site contains positive detections of several special-status species and has the potential to support numerous special-status species and their associated habitat. Species that can be considered to be endangered, rare or threatened as defined in CEQA Guidelines section 15380, with potential to occur on-site include, but are not limited to: [...]

Response to Comment A.1-4

The comment lists special-status species with the potential to occur on the project site. DPR acknowledges that these species may occur on the site, as described in EIR¹ section 7.2.4 and Appendix E.

¹ All references to EIR sections and appendices are to the Draft EIR unless otherwise specified.

Comment A.1-5**I. Project Description and Related Impact Shortcoming****COMMENT 1: Crotch's Bumble Bee:****Mitigation Measure BIO-2A: Pre-construction Survey for Crotch's Bumble Bee**

The Carnegie SVRA area is within the current known range of the Crotch's bumble bee. Potential adverse effects to this species from vegetation removal, clearing, grubbing, and grading work on-site may include direct mortality through crushing or filling of active bee colonies and hibernating bee cavities, reduced reproductive success, loss of suitable breeding and foraging habitats, and loss of native vegetation that may support essential foraging habitat.

CDFW recommends that the following elements are added to the mitigation measure in a revised draft EIR to be more protective of Crotch's bumble bee.

CDFW recommends changing the mitigation measure to state that surveys shall be conducted each year Project activities occur. The mitigation measure states: "If the pre- construction surveys do not identify Crotch's bumble bee nests, no additional surveys and mitigation are required." Bumble bees can move nest sites each year so one year of surveys may not be sufficient to locate nests and reduce impacts to a less-than-significant level.

CDFW recommends planning vegetation/habitat removal such that impacts are planned to be divided into a sufficient number of units so that the whole of the habitat is not impacted in the same year. This will allow refuge, habitat, and floral resources to remain during work activities.

Response to Comment A.1-5

DPR acknowledges that Carnegie SVRA is within in the range of the Crotch's bumblebee and that the proposed RMA Program has the potential to impact this species, see EIR sections 7.2.4 and 7.3.2.2.

Mitigation Measure BIO-2a specifies that the Crotch's bumble bee preconstruction surveys shall occur within one year prior to vegetation removal or ground-disturbing activities. Therefore, no changes are needed to Crotch's bumble bee mitigation to reduce potential impacts to less than significant.

The project area is divided into multiple units (RMAs); see Figure 2-5. Based on the known scale of projects and the 10-year implementation period, it is estimated that rehabilitation projects would not disturb more than 20 acres in any given year; see EIR section 2.4.2 for more information. Therefore, the whole Crotch's bumble bee habitat would not be impacted in the same year.

Comment A.1-6**COMMENT 2: Mitigation Measure BIO-3A and 3c: Protection of Special-Status Amphibians and Reptiles****Western Pond Turtle**

Western pond turtle are known to nest in the spring or early summer within 100 meters of a water body, although nest sites as far away as 500 meters have also been reported. Additionally, western pond turtle can spend up to 200 days away from water, especially since ponds tend to dry down during summer months.

CDFW recommends adding the following information to a revised draft EIR for protection of western pond turtle. If nesting habitat for western pond turtle is found at a Project site, exclusion fencing shall be placed prior to egg-laying season (March through August). Exclusion fencing shall be designed to encompass the work site and maintained weekly until construction activities at the work site are completed. If a western pond turtle nest is found, a 100-foot no disturbance buffer shall be demarcated around the nest, and no work shall occur until the hatchlings have dispersed.

Response to Comment A.1-6

DPR acknowledges the pond turtle dispersal distances and use of upland habitat. The recommended revision was made to Mitigation Measure BIO-3c: Protection of Special-Status Amphibians and Reptiles, see Chapter 4 Errata and Revisions.

Comment A.1-7

Alameda Whipsnake

BIO-3a and 3b discuss habitat assessment, flagging habitat features, conducting a pre-construction survey prior to ground-disturbing activities, monitoring ground-disturbing work if species are encountered in or near the work site during the habitat assessment or survey, adjusting or postponing work if species are found during work, allowing them to leave of their own volition, exclusion fencing, and rescheduling working times and locations. However, these actions are not specific to the behaviors of Alameda whipsnake to fully avoid or minimize impacts to them. CDFW recommends the following information is added to a revised draft EIR to fully minimize impacts to Alameda whipsnake to a less-than-significant level:

- Implement temperature restrictions conducive to Alameda whipsnake movement for all ground-disturbing work within suitable habitat to allow for snake dispersal. For vegetation removal work in Alameda whipsnake habitat, CDFW recommends that work occur during winter months, where feasible, when snakes are less active (Alvarez, 2021);
- A qualified biologist should survey ahead of all manual and mechanical work in suitable habitat areas;
- Work crews should be advised on where to broadcast wood chips to avoid potential Alameda whipsnake refugia such as rocky outcrops and mammal burrows, in addition to limiting chip depth in suitable habitat to prevent disruption of Alameda whipsnake thermoregulation;
- CDFW recommends that these Alameda whipsnake habitat types (annual grassland, oak savanna, oak-bay woodland, mixed evergreen forest, riparian and areas with rock outcrop features) be mapped on the Project sites and Project impacts such as permanent destruction of habitat and permanent new roads and ongoing impacts from roadways be identified in a revised EIR; and
- The EIR should also address impacts to the Alameda whipsnake from fragmentation of habitat, permanent loss of habitat and impacts from vehicle traffic on roadways.

CDFW recommends for this Project, that the Project mitigate for these impacts to Alameda whipsnake and their habitats to a less-than-significant level requiring compensatory mitigation in the form of conserved lands at minimum 5:1 (mitigation to impact) ratio for new roadways, a minimum 3:1 ratio for all other permanent impacts and a minimum of 1.25:1 ratio for temporary

impacts. Conserved lands should be protected in perpetuity under a legal instrument such as a conservation easement and be managed in perpetuity through an endowment with an appointed land manager. CDFW recommends that priority for conserved lands be given to on-site locations. To ensure significant impacts are adequately mitigated to a less-than-significant level, feasible mitigation measures described above should be incorporated as enforceable conditions into the final CEQA document for the Project.

Response to Comment A.1-7

The summary of Mitigation Measures BIO-3b and BIO-3c is correct. As recommended by CDFW, Mitigation Measure BIO-3b requires surveys ahead of all manual and mechanical work in suitable habitat area, which would take into account suitable Alameda whipsnake habitat. The EIR describes potential Alameda whipsnake habitat types consistent with CDFW's description (see Table 7-4), and overall vegetation communities were mapped as recently as 2021 (see EIR section 7.2.2). Mitigation Measure 3a prohibits siting new facilities in the new or existing RMAs within 150 feet of preferred Alameda whipsnake habitat, particularly scrub vegetation types.

It is generally not feasible for work to occur in the winter months because clearing, grubbing, and grading activities can denude large areas of vegetation, exposing and destabilizing the underlying soils. The exposed soils could pose a threat to water quality since sediment could become detached and carried away in surface water runoff. When scheduling ground-disturbing construction, DPR considers the amount and duration of soil exposed to forces of erosion by wind, rainfall, or runoff and seeks to minimize disturbed soil area during the rainy season. Take of Alameda whipsnake would be avoided given the comprehensive mitigation actions, including habitat assessment, habitat avoidance, preconstruction surveys, and construction monitoring; therefore, this recommendation was not included in the mitigation measures. Wood chips are not expected to be produced from project activities. Typically, dead or downed trees are used as natural blockades or left in place as important habitat features. Therefore, CDFW's recommendation regarding woodchips was not added to the mitigation measures. Project activities would not result in impacts to Alameda whipsnake from fragmentation of habitat, permanent loss of habitat, or impacts from vehicle traffic on roadways.

The proposed RMA Program would not cause habitat loss to Alameda whipsnake, and no compensatory mitigation is required. The proposed project would increase the area and quality of available Alameda whipsnake habitat in the proposed trails-only riding areas of the new RMAs due to reduced trail density and increased vegetation in those areas. See EIR sections 2.4 and 7.3.2.3 for more information. No new roadways are proposed, and no permanent net loss to Alameda whipsnake habitat would occur. Temporary impacts on Alameda whipsnake would be avoided by SPRs incorporated in the project (EIR Appendix B) and Mitigation Measure BIO-3. Carnegie SVRA is public land already protected from development; no conservation easement is needed.

Comment A.1-8

COMMENT 3: Mitigation Measure B10-5 Special-status and Roosting Bat Protection

CDFW recommends that the following elements are added to the mitigation measure in a revised draft EIR to be more protective of special-status bats.

Bat Colony Avoidance. If bat colonies are observed at the Project site at any time, all Project activities stop until the qualified bat biologist develops a bat avoidance plan to be implemented at the Project site. Once the plan is implemented, Project activities may recommence. If a

maternity colony is found, there shall be no disturbance to the roost site until the young become volant (after August 31) because they are unable to fly. If a maternal colony is found after construction activities have begun, a no-work buffer area shall be established around the maternal roost.

Tree Removal Methodology. Any trees containing bat roosting habitat (e.g. cavities, crevices, deep bark fissures) shall be marked and removed using a two-day phased method as follows: On day one, under the supervision of a qualified biologist, all limbs not containing bat roosting habitat shall be removed using chainsaws only. The next day, the rest of the tree shall be removed.

All trees shall be removed during seasonal periods of bat activity: Prior to maternity season - from approximately March 1 (or when night temperatures are above 45°F and when rains have ceased) through April 15 (when females begin to give birth to young); and prior to winter torpor - from September 1 (when young bats are self-sufficiently volant) until about October 15 (before night temperatures fall below 45°F and rains begin). If tree removal must occur outside of these timeframes, a qualified biologist shall survey the trees to the extent feasible to determine if maternity colonies or winter torpor bats are present. If present, the tree shall not be removed until females have given birth to young and when young bats are self-sufficiently volant, as determined by a qualified biologist.

Response to Comment A.1-8

Mitigation Measure BIO-5 has been revised to address CDFW recommendations; see Chapter 4 Errata and Revisions.

Comment A.1-9

COMMENT 4: Mitigation Measure BIO-7: American Badger Protection.

CDFW recommends adding the following information into a revised draft EIR to fully avoid and minimize impacts to American badger.

CDFW recommends conducting preconstruction surveys for American badger no more than 7 instead of 14 days before ground-disturbing activities. Additionally, besides searching the work site for badger dens, the qualified biologist should also search for burrows, diggings, and other signs of activity. If a burrow/den is found, a survey should be performed daily prior to beginning ground-disturbing work. Pre-construction surveys should be repeated as necessary if ground-disturbing activities are delayed or postponed for more than seven days. If burrows or dens are observed within the Project area and within 100 feet of the Project footprint, the qualified biologist should monitor them for a minimum of 3 nights. If unoccupied, the den should be excavated by hand. If the burrow or den is determined to be active, a 100-foot no-work buffer should be established and monitored for 3 more nights to determine if it is a natal den. If it is a natal den, a 200-foot no-work buffer should be established around a natal den, and a 100-foot no-work pathway through suitable habitat should be established to ensure safe passage to and from the den around the work area. A qualified biologist should monitor the site during work to ensure breeding badgers are not impacted. Buffers shall be enlarged as necessary.

Response to Comment A.1-9

Mitigation Measure BIO-7 has been revised consistent with CDFW recommendations; see Chapter 4 Errata and Revisions.

Comment A.1-10

COMMENT 5: Mitigation Measure B1O-9: Replacement of Sensitive Natural Communities.

Special-status plants are often narrowly distributed endemic species. They are susceptible to habitat loss and habitat fragmentation resulting from development, vehicle and foot traffic, and introduction of non-native plant species. Therefore, there is high potential for the Project to have significant impacts to these species and their populations. To reduce impacts to CESA-listed plants to less than significant, CDFW recommends revising the draft EIR by adding the following language:

The Project shall complete two years of protocol-level botanical surveys and incorporate the results into a revised EIR. The botanical survey results shall follow CDFW's 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities, including, but not limited to, conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts such as altering off-site hydrological conditions where the above species may be present. Surveys conducted during drought conditions may not be acceptable. If the botanical surveys result in the detection of the above CESA listed plants that may be impacted by the Project, or the presence of these species is assumed, the Project applicant shall obtain a CESA ITP from CDFW prior to construction and comply with all requirements of the ITP. Surveys conducted during drought conditions may not be acceptable.

Response to Comment A.1-10

Two years of protocol-level botanical surveys are not necessary to avoid potentially significant impacts on special-status plants from the proposed RMA Program. The proposed RMA Program would increase the available habitat for special-status plants and reduce impacts on existing populations in the new RMAs over the long term by reducing trail density, increasing vegetation cover, building and maintaining sustainable trails, limiting most OHV recreation to designated trails, and enforcing trails-only riding where designated; see EIR section 7.3.2.1 for more information. Short-term impacts on special-status plants would be avoided by SPRs incorporated into the project (see EIR Appendix B). SPRs to protect special-status and locally rare plant species include avoidance of known occurrences of these species with flagging or fencing, dust control within 100 feet of these species, and pre-activity surveys for special-status and locally rare plants that could occur in project work areas. DPR has 40 years of data on special-status plant populations in Carnegie SVRA based on numerous past surveys, and additional protocol-level surveys are not needed to avoid them. All impacts to special-status plants from the proposed RMA Program would be less than significant with incorporation of the SPRs.

Comment A.1-11**II. Editorial Comments and/or Suggestions**

CDFW recommends adding the following measure to the revised draft EIR for the protection of wildlife:

Erosion Control Material Limitation. To minimize the risk of ensnaring snakes and other wildlife, Permittee shall not use erosion control materials containing synthetic (e.g., plastic or nylon) monofilament netting or cross joints in the netting that are bound/stitched. Geotextiles, fiber rolls, and other erosion control measures shall be made of loose-weave mesh, such as coconut (coir) fiber, or other products without welded or tight weaves.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link:

<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link:

<https://www.wildlife.ca.gov/Data/CNDDDB/Plantsand-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final.

Response to Comment A.1-11

The recommended measure to protect snakes and other wildlife was added to Mitigation Measure BIO-3a, see Chapter 4 Errata and Revisions.

DPR will report any special-status species and natural communities detected during project surveys to the CNDDDB.

DPR will pay the environmental document filing fee upon filing of the Notice of Determination.

3.2 ORGANIZATIONS

3.2.1 Blue Ribbon Coalition

Comment O.1

History and Purpose of Carnegie SVRA

Carnegie State Vehicular Recreation Area has a long history as a motorized recreation site that predates its management by the State of California. The area became a popular riding destination beginning in the mid twentieth century, and in the 1960s it operated as a privately owned motorcycle riding facility known as Carnegie Cycle Park. As off highway recreation continued to grow in popularity, the State of California recognized the importance of preserving this location for recreation. In 1979 the State purchased the property using funds from the Off Highway Vehicle Trust Fund specifically to establish a dedicated off highway recreation area.

The decision to acquire the property using OHV program funds is significant. The OHV program was created to ensure that recreation opportunities for off highway vehicle users would be protected and managed for the public. Carnegie SVRA was purchased and designated specifically as a recreation area for this purpose. As a result, the primary management objective for the site should remain the provision of high quality recreation opportunities for the public. Any proposal that would reduce or remove the recreational use that justified the original acquisition is inconsistent with the purpose for which these funds were used.

This concern is especially important given the scarcity of true open riding areas in California. Currently open OHV riding areas account for less than one percent of public land in the state. These types of areas are extremely limited and are increasingly difficult to replace once they are lost. Facilities such as Carnegie SVRA play a critical role in providing legal, managed opportunities for riders, particularly for residents in the Bay Area and Central Valley who have limited nearby recreation options. Protecting these designated recreation areas is essential to maintaining the balance that the state intended when it established the OHV program.

Response to Comment O.1-1:

The comment summarizes the history of Carnegie SVRA and its regional importance for OHV recreation. The history of Carnegie SVRA and its acquisition by DPR is described in EIR section S.1, the purpose of Carnegie SVRA is described in EIR section 4.1.3, and the regional recreational importance of Carnegie SVRA is described in EIR section 11.2.1. Carnegie SVRA would remain open to OHV recreation with implementation of the proposed RMA Program. There is no specific comment on the proposed RMA Program or the analysis in the EIR.

Comment O.1-2

Economic Contributions of OHV Recreation

Off highway vehicle recreation provides substantial economic benefits to California and to the communities that surround recreation areas such as Carnegie SVRA. Studies examining motorized recreation in California have found that off highway vehicle recreation contributes billions of dollars to the state economy each year and supports thousands of jobs. Economic analyses estimate that OHV recreation contributes approximately 7.7 billion dollars in annual economic activity statewide and supports businesses across multiple sectors including vehicle sales, repair services, lodging, restaurants, equipment retailers, fuel stations, and tourism related services.

These economic benefits are particularly important for rural communities and gateway towns that depend on recreation tourism. Visitors traveling to riding areas spend money locally on food, lodging, fuel, vehicle parts, and other supplies. This spending directly supports small businesses and employment in surrounding communities. State Vehicular Recreation Areas throughout California generate significant visitor spending, and recreation based tourism continues to be an important part of the outdoor recreation economy in the state.

Reducing access or limiting recreational use at established riding areas can have immediate and measurable economic consequences. Local businesses that rely on recreation tourism experience reduced visitation, seasonal jobs may be lost, and communities that depend on outdoor recreation can face economic uncertainty. Maintaining access to established recreation areas like Carnegie SVRA helps sustain a stable recreation economy that benefits both local communities and the broader state economy.

Response to Comment O.1-2:

The comment describes the economic benefits of OHV recreation and states that maintaining access to recreation areas like Carnegie SVRA helps sustain a stable recreation economy. Carnegie SVRA would remain open to OHV recreation with implementation of the proposed RMA Program. As noted in CEQA Guidelines section 15131, economic or social effects of a project shall not be treated as significant effects on the environment. Consequently, this comment requires no further response.

Comment O.1-3**Recent Planning and Management Updates**

Carnegie SVRA has already undergone a recent planning and management update. In 2024 the Department completed a major planning effort that evaluated management strategies and future improvements for the park. That process included environmental review, extensive analysis of resource conditions, and public participation.

Because such a comprehensive review was completed so recently, significant changes to the fundamental recreational use of the park so soon afterward would be premature. Management plans are intended to provide long term stability and direction. Revisiting major restrictions immediately following a comprehensive planning effort undermines the planning process and creates uncertainty for recreationists, businesses, and the public who rely on the park.

Response to Comment O.1-3:

The comment refers to the 2024 Carnegie SVRA General Plan Update, described in EIR section 4.1.6. The General Plan Update and the RMA Program have different purposes and timelines and are separate projects. Note that the General Plan approval was rescinded in June 2026 pending completion of additional CEQA analysis. The General Plan Update, when final, will present a new broad-based policy document that establishes an updated long-range vision for the SVRA and provide goals and guidelines to direct future improvements, services, and programs. The RMA Program is narrowly focused on providing ongoing sustainable OHV recreation management in Carnegie SVRA by reducing trail density, increasing vegetation cover, creating sustainable trails, enforcing trails-only riding, rehabilitating damaged soil surfaces, and implementing soil loss and erosion control measures that disperse storm water runoff to prevent accelerated erosion. See Chapter 2 of the RMA Program EIR for detailed information on the proposed RMA Program. Also see section 4.3.3.1 regarding the RMA Program consistency with the 1981 General Plan and section 4.3.3.2 regarding the RMA Program consistency with the 2024 General Plan Update.

Comment O.1-4**Best Available Science and Transparency**

If restrictions such as converting open riding areas to trail only designations are being considered based on concerns related to soil degradation, erosion, or water quality impacts, those decisions should be supported by the best available science and transparent data. Management decisions that significantly alter recreational access should be based on clearly documented evidence that can be reviewed by the public.

If soil conditions, erosion rates, sediment transport, or water quality degradation are cited as justification for restrictions, the underlying data and analysis should be made publicly available. Providing that information allows stakeholders, researchers, and the public to review the methodology, understand the scope of the impacts, and evaluate whether the proposed management response is proportional to the identified issue.

Transparency in the use of scientific data is critical for maintaining public trust in land management decisions. When agencies clearly present the evidence used to support management actions, it strengthens confidence in the decision making process and helps ensure that policy changes are grounded in credible analysis rather than perception or anecdotal concerns.

Response to Comment O.1-4:

The comment does not address the analysis in the EIR. The RMA Program is proposed to address maintenance and management actions so that the SVRA remains in compliance with soil standards. As indicated by the comment, DPR is mandated to meet best available science and technology when implementing the park's Soil Conservation Plan (SCP). The purpose and objectives of the RMA Program are listed in EIR section 2.2. EIR section 2.3.4 describes the regulatory context of the RMA Program, including the SCP. The purpose of the RMA Program is to support responsible stewardship of the land by managing OHV use while maintaining quality OHV recreational opportunities for visitors of Carnegie SVRA. Objectives include operating Carnegie SVRA consistent with applicable laws and regulations. Other objectives are to meet water quality objectives and prevent accelerated erosion. As described in EIR section 9.2.3.1, the NRCS has rated nearly all soils in Carnegie SVRA with either a severe or very severe off-trail erosion hazard. As described in EIR section 10.2.2, sediment is the primary pollutant in the Corral Hollow watershed (main watershed in Carnegie SVRA).

Comment O.1-5**Dispersed Camping**

BRC believes that all users can and should be accommodated. This plan should ultimately identify reasonable standards for allowing dispersed camping. According to The Dyrtr, a camping app, camping has grown immensely since 2019. Public lands are needing more camping facilities than ever before as almost 50% of campers are new campers. The number of people who use public land to camp is only growing every year. The state of California needs to strongly consider providing as many camping areas as possible as to not concentrate use in limited sites. Keeping trails open and areas open to riding allows more opportunities to camp. Management strategies should be exhausted before restrictions and closures of areas to any type of recreational use. Better facilities to address waste issues need to be created before any restrictions. BRC supports all recreational activities if done responsibly. The 2024 plan identifies options if there are adverse impacts. Those need to be used, rather than just closing acreage to open OHV use.

We are concerned that closing dispersed camping options will eventually lead to reservation systems which ultimately give advantage to upper-class users as oftentimes marginalized groups do not have the luxury of making reservations that far in advance. Another issue is those who make reservations and don't show up, it takes away opportunities to utilize public lands from someone who otherwise would have used the camping spot. California State Parks should look at data of reservation system implementations to see how they affect various user groups before implementing any type of reservation system. According to a study on reservation systems in National Parks, "Results suggest that for each of the five campgrounds, those campers camping in sites that require reservations came from areas with higher median household incomes, on average." The study also concludes that the online reservation systems cater to primarily white users. California should stop their proposals to limit free, primitive and dispersed camping as more and more research is showing that is discriminatory. We support allowing dispersed camping and believe it provides a valuable user experience that the state should be protecting. Research shows that having an experience in nature where no one else has been has many mental and physical health benefits. Restricting dispersed camping will hinder these benefits. Outdoor recreation has grown incredibly the last few years because the public is starting to recognize the value that enjoying nature brings to your life. In fact, NASA claims that human exploration is innate and what leads to discovery.

Response to Comment O.1-5:

This is a comment on dispersed camping and the camping reservation system at Carnegie SVRA. There is no specific comment on the proposed RMA Program or the analysis in the EIR. There is no dispersed camping at Carnegie SVRA; camping is limited to 26 designated campsites in the SVRA. The campsites are not within the RMA Program area. All the campsites at the SVRA are first-come, first-served, and no reservation is required or available. The RMA Program would not change camping availability or the camping reservation system at Carnegie SVRA. Consequently, this comment requires no further response.

Comment O.1-6**Wealth Inequality**

BRC strongly encourage the California State Parks to incorporate into their planning the findings of *The Shums of Aspen: Immigrants vs. the Environment in America's Eden* by Lisa Sun-Hee Park and David Pellow and *Billionaire Wilderness: The Ultra-Wealthy and the Remaking of the American West* by Justin Farrell. Both of these works document extensively how Western communities surrounded by public land are undergoing significant socioeconomic changes that result in skyrocketing housing costs, use of conservation and land-use restrictions to limit development, and displacement of the local middle and lower classes from Western Communities. Conservation policies and land-use restrictions are the primary tools that the ultra-rich use to disenfranchise the remaining American public from being able to access and enjoy the public benefits of public land. In many cases public lands become the private enclaves for the enjoyment of recreation pursuits and cultural values of the ultra wealthy.

We have been concerned to hear private property owners making the arguments for conservation that are the subject of critique in the works cited by Sun-Hee Park, Pellow, and Farrell. It is often the case when the ultra-wealthy colonize western communities that they use private property and conservation easements to create buffer zones that prevent public access to public lands. Given the land ownership patterns in these counties, it is very likely that privately developed land-use restrictions will inevitably result in decreased access to public lands by the public. When combined with the socioeconomic forces behind this trend, this loss of access will disproportionately impact those marginalized by poverty and inequality.

Consider this passage from *Billionaire Wilderness* where Justin Farrell describes how land conservation fueled the intense wealth inequality that is becoming increasingly characteristic of Colorado's gateway mountain communities:

But data reveal that this economic thinking is misguided, *especially in places where ultra-wealth and inequality collide with pervasive land conservation*. What this means is that the "rising tide lifts all boats" approach can have the effect of intensifying economic differences. More specifically, and following the same logic as earlier with the protection and production of wealth, I consider the effect of land conservation on which job sectors are growing or declining (that is, available jobs and total income), and as a result, the staggering decline of reasonably priced housing.

First, conservation has directly and indirectly intensified wealth inequality by making the area uniquely attractive to the ultra-wealthy, creating intense housing demand *and* land scarcity that has dramatically reshaped who lives in the community, and how people make their money. [...] As more and more ultra-wealthy people move to the area for natural amenities (for example, protected lands, abundant wildlife), it dramatically restructured the socioeconomic hierarchy -

becoming both a cause, and a consequence, of conservation values. Conservation became a form of elite cultural currency, and conservation organizations benefited from the financial flow down, all while it became harder for middle- and lower-income people to survive there (pp. 96-97).

Farrell's work also documents how the ultra-wealthy commandeer local governments to the extent that these governments become vehicles for enacting their preferred policy preferences, which include highly restricting public access to public land. While we generally believe that land agencies should show deference to local communities, when those communities are captured by elitist economic interests and begin to advocate for policies that cut off the general public from publicly managed land, then it is imperative for the state government to check and balance the misguided use of local power.

Response to Comment O.1-6:

This is a comment on socioeconomic changes of communities surrounding public lands. There is no specific comment on the proposed RMA Program or the analysis in the EIR. The purpose of the RMA Program is to support responsible stewardship of the land by managing OHV use while maintaining quality OHV recreational opportunities for visitors of Carnegie SVRA. As noted above, economic or social effects of a project shall not be treated as significant effects on the environment. This comment requires no further response.

Comment O.1-7

Conclusion

We would like to close by saying we support "shared use". As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and nonmotorized recreation use often overlap as OHV's often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs. BRC supports the no action alternative.

Response to Comment O.1-7:

This is a comment on shared use between motorized and nonmotorized recreation and provides support for the EIR's No Project ("no action") Alternative. There is no specific comment on the proposed RMA Program or the analysis in the EIR. Carnegie SVRA is primarily used for motorized recreation and is not designed for nonmotorized recreation. The proposed RMA Program would not change the recreational use of the SVRA.

The comment does not address the EIR's analysis of the No Project Alternative. The No Project Alternative was rejected by DPR in favor of the proposed RMA Program because the alternative does not meet the project objectives and has reduced beneficial effects and/or increased impacts compared to the proposed project. See EIR section 12.2.1 for more information.

Comment O.1-8

BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address:

Ben Burr
BlueRibbon Coalition
P.O. Box 5449

Pocatello, ID 83202

brmedia@sharetrails.org

Response to Comment O.1-8:

Comment noted. BRC is added to a list of commenters requesting notification about the project.

3.2.2 Cal4wheel Drive Association

Comment O.2-1

California Four Wheel Drive Association (Cal4Wheel) respectfully submits the following comments on the Carnegie State Vehicular Recreation Area (SVRA) Recreation Management Plan (RMP) Draft Environmental Impact Report (Draft EIR). Cal4Wheel represents more than 3,500 members across California who actively recreate on public lands using off-highway vehicles (OHVs). Many of our members live within the greater San Francisco Bay Area and Central Valley regions and rely on Carnegie SVRA as one of the few remaining motorized recreation areas within practical driving distance of these highly populated regions. This letter does not supplant the rights of individual Cal4Wheel members, clubs, or partner organizations to submit additional comments. California State Parks should fully consider and respond to all substantive comments submitted during the public review process.

Cal4Wheel has a long history of partnership with the California Department of Parks and Recreation and the Off-Highway Motor Vehicle Recreation (OHMVR) Division through volunteer service, stewardship activities, safety education, and collaborative planning processes. Our members utilize Carnegie SVRA for recreation, organized club events, safety training, and conservation stewardship. Many Cal4Wheel members have concrete, definite, and immediate plans to continue recreating at Carnegie SVRA throughout the future. Due to this longstanding connection to the park and the statutory purpose of the SVRA system, Cal4Wheel has a direct and substantial interest in ensuring that the final Recreation Management Plan and associated environmental review fully comply with the mandates of California law while protecting and expanding opportunities for responsible motorized recreation.

Response to Comment O.2-1:

This comment introduces the California Four Wheel Drive Association (Cal4Wheel) and explains Cal4Wheel's use of and interest in Carnegie SVRA. There is no specific comment on the proposed RMA Program or the analysis in the EIR. No further response is required.

Also note that the comment incorrectly refers to the project as a Recreation Management Plan rather than a Resource Management Area (RMA) Program.

Comment O.2-2

Legislative Mandate for SVRAs Requires Prioritization of Motorized Recreation

Carnegie SVRA exists for a fundamentally different purpose than most units within the California State Park system. While the broader state park system prioritizes preservation and passive recreation, State Vehicular Recreation Areas are legislatively designated to provide motorized recreation opportunities. California Public Resources Code establishes this mandate clearly:

- PRC §5090.02 states that the purpose of the OHMVR program is to provide “opportunities for off highway motor vehicle recreation while protecting natural resources.”

- PRC §5090.35(a) directs the Department to manage SVRAs in a manner that provides for high quality OHV recreation opportunities.
- PRC §5090.42 further directs the OHMVR Division to ensure that lands acquired or designated for the program are managed specifically for motorized recreation.

The statutory language is explicit: motorized recreation is not merely an allowed use within SVRAs—it is the primary purpose of these areas.

The Draft EIR repeatedly frames OHV recreation as a management concern rather than as the central purpose of the park. This framing reverses the statutory hierarchy established by the OHMVR program and risks undermining the legislative intent that created the SVRA system. As currently written, the Draft EIR does not sufficiently demonstrate that the Recreation Management Plan prioritizes expansion, improvement, and long-term sustainability of OHV recreation opportunities at Carnegie.

The final RMP must clearly articulate that Carnegie SVRA is managed first and foremost to provide high-quality motorized recreation opportunities, while natural resource protection measures are implemented in a manner that supports... not replaces... that primary mission.

Response to Comment O.2-2:

This comment cites the Public Resources Code (PRC) and states that Carnegie SVRA should be managed primarily for OHV recreation. There is no specific comment on the proposed RMA Program or the analysis in the EIR. The proposed RMA Program would comply with applicable regulations and would not restrict access to OHV recreation in Carnegie SVRA. Some areas in the SVRA that are currently open to distributed OHV riding would be changed to trails-only riding (see EIR section 2.4 for more information). The PRC does not require SVRAs to provide distributed OHV riding but does require that SVRAs are managed for long-term environmental sustainability (see EIR section 2.3.4 for more information). RMA Program objectives include compliance with PRC section 5090.43(a), which requires DPR to “[p]rovide for quality OHV recreation opportunities consistent with the declared purpose for the SVRA, including making the fullest appropriate public use of the vehicular recreational opportunities present while ensuring cultural resources conservation and conservation and improvement of natural resources.” The EIR defines “quality recreational opportunities” as meaning areas “providing OHV opportunity that is of challenge and interest to the targeted recreationist, of adequate quantity in mileage and/or acreage, and well maintained in conjunction with other site amenities suitable to the site...” See EIR section 2.2.2.

Also note that the comment incorrectly refers to the project as a Recreation Management Plan rather than a Resource Management Area (RMA) Program.

Comment O.2-3

Regional Deficit of Motorized Recreation Opportunities

The importance of Carnegie SVRA cannot be understood without considering the broader regional context. The San Francisco Bay Area and surrounding metropolitan regions collectively represent one of the largest concentrations of population in the United States, yet opportunities for motorized recreation in this region are extremely limited. Within several hours of the Bay Area, the number of OHV recreation areas is remarkably small. Carnegie SVRA serves as one of the only dedicated OHV riding areas accessible to millions of residents.

Across California:

- The State Park system encompasses approximately 1.59 million acres across more than 280 units.
- Only nine State Vehicular Recreation Areas exist statewide.
- These SVRAs collectively represent less than 9 percent of the total state park acreage.

When viewed in the context of all public lands within California - including federal lands managed by the Bureau of Land Management and the U.S. Forest Service - the acreage available specifically for OHV recreation represents well under 1% of total public lands (California Department of Parks and Recreation, 2024).

In contrast, tens of millions of acres of public land in California are closed to motorized access through wilderness designation, wildlife refuges, national parks, and other restrictive land classifications. The scarcity of motorized recreation areas near major population centers makes Carnegie SVRA uniquely valuable. Management decisions that reduce riding opportunities within this park therefore have disproportionately large impacts on the public. Rather than considering additional restrictions on motorized recreation, the Recreation Management Plan should focus on expanding access opportunities, improving trail connectivity, and enhancing riding experiences to meet the recreational needs of the region.

Response to Comment O.2-3:

This comment summarizes the importance of Carnegie SVRA for motorized recreation in the regional context and notes the majority of public lands in California are closed to motorized recreation. There is no specific comment on the proposed RMA Program or the analysis in the EIR. The regional recreational importance of Carnegie SVRA is described in EIR section 11.2.1. The proposed RMA Program would provide ongoing sustainable OHV recreation management through reducing trail density, increasing vegetation cover, creating sustainable trails, enforcing trails-only riding, rehabilitating damaged soil surfaces, and implementing soil loss and erosion control measures that disperse storm water runoff to prevent accelerated erosion. Carnegie SVRA would remain open to OHV recreation with implementation of the proposed RMA Program.

Also note that the comment incorrectly refers to the project as a Recreation Management Plan rather than a Resource Management Area (RMA) Program.

Comment O.2-4

Failure to Fully Evaluate Recreation Displacement Effects

The Draft EIR does not sufficiently analyze the recreation displacement effects that will result from reductions in available riding opportunities within Carnegie SVRA. When motorized recreation opportunities are restricted in designated riding areas, users are frequently displaced to other locations. This phenomenon is widely documented in recreation management research and can lead to unintended environmental impacts, including unauthorized trail creation and resource damage outside managed areas (Cordell et al., 2008). CEQA requires analysis of reasonably foreseeable indirect environmental effects (CEQA Guidelines §15358). If riding opportunities within Carnegie are reduced or constrained, riders will predictably seek alternative locations on nearby public lands where motorized recreation may not be authorized. This displacement will result in:

- Unauthorized trail creation on adjacent public lands
- Increased enforcement challenges
- Resource damage in unmanaged areas

Because these outcomes represent reasonably foreseeable physical environmental effects, they must be fully analyzed under CEQA. The Draft EIR should be revised to include a comprehensive recreation displacement analysis, including mitigation strategies designed to ensure that Carnegie SVRA continues to provide sufficient riding opportunities to accommodate regional demand.

Response to Comment O.2-4:

As explained in EIR section 11.3.2, the project would have a net impact of converting 169 acres of distributed riding area to trails-only riding (EIR Table 2-5) over a 10-year period. There would be no change in overall SVRA acreage available to OHV recreation and therefore no adverse impact on recreational opportunity. This change would provide increased protection of park soils and vegetative cover by putting into place a system of sustainable, well-maintained OHV trails. This is expected to have a positive effect on the environment by reducing erosion and sedimentation and protecting natural and cultural resources. Under the proposed RMA Program, 167 acres of distributed riding area would still be available to recreationists after complete implementation of all RMAs as well as numerous improved and well-maintained trails in the trails-only area. For these reasons and others described in section 11.3.2, the project is not expected to have adverse direct or indirect impacts on recreational facilities that might have an adverse effect on the environment, such as causing OHV recreationists to go elsewhere to recreate.

Comment O.2-5

Accessibility and Equity Considerations for Motorized Recreation

Motorized recreation plays a critical role in providing equitable access to public lands for individuals with mobility limitations. Many individuals with disabilities rely on OHVs as their primary means of accessing outdoor recreation opportunities. Limiting motorized access within SVRAs can therefore create disproportionate barriers for individuals who cannot access backcountry environments through nonmotorized means. California law recognizes the importance of accessibility within public recreation areas.

For example:

- PRC §5070 requires state parks to ensure access for individuals with disabilities.
- Federal disability law similarly emphasizes equal access to outdoor recreation opportunities.

Because SVRAs provide one of the few forms of backcountry access available to individuals with mobility impairments, the Recreation Management Plan should explicitly recognize the important accessibility benefits of OHV recreation.

The Draft EIR should therefore incorporate accessibility considerations into the analysis of recreation alternatives and ensure that proposed management strategies do not disproportionately reduce access for mobility-limited individuals.

Response to Comment O.2-5:

The proposed RMA Program would not restrict motorized recreation access to Carnegie SVRA, including for recreationists with disabilities. See response to comment O.2-4 and EIR section 11.3.2 for more information.

Also note that the comment incorrectly refers to the project as a Recreation Management Plan rather than a Resource Management Area (RMA) Program.

Comment O.2-6**Inadequate Consideration of Economic Benefits of OHV Recreation**

Outdoor recreation represents a major economic driver across the United States. According to the U.S. Bureau of Economic Analysis, outdoor recreation contributes more than \$454 billion annually to the national economy and supports millions of jobs (BEA, 2023). Motorized recreation represents a substantial portion of this activity. The U.S. off-highway vehicle market alone generates billions of dollars in annual economic activity through equipment purchases, tourism spending, lodging, fuel sales, and vehicle maintenance.

Carnegie SVRA contributes directly to the economies of nearby communities through visitation, tourism, and recreation-related spending. However, the Draft EIR contains limited discussion of these economic contributions. CEQA requires that social and economic impacts be analyzed when they contribute to physical environmental changes (CEQA Guidelines §15131). If reductions in recreation opportunities reduce visitation, resulting economic changes may produce secondary environmental effects such as land-use changes or economic decline in nearby communities.

The Draft EIR should therefore incorporate a more comprehensive analysis of the economic contributions of Carnegie SVRA, including the role the park plays in supporting local recreation based economies.

Response to Comment O.2-6:

The purpose of the RMA Program is to support responsible stewardship of the land by managing OHV use while maintaining quality OHV recreational opportunities for visitors of Carnegie SVRA. Although the comment correctly notes that economic and social effects can be considered when they contribute to physical environmental changes, approval of the RMA Program would result in no change in overall SVRA acreage available to OHV recreation. Therefore, the potential for reduced visitation that results in economic changes that produce secondary environmental effects, such as land-use changes or economic decline in nearby communities, is purely speculative and unsupported. CEQA Guidelines section 15384 notes that argument, speculation, unsubstantiated opinion, or narrative evidence that is clearly erroneous or inaccurate, or evidence of social or economic impacts that do not contribute to or are not caused by physical impacts on the environment, do not constitute substantial evidence. This comment requires no changes to the EIR.

Comment O.2-7**Need for Proactive Trail System Expansion and Recreation Infrastructure Improvements**

The Recreation Management Plan represents an opportunity not merely to maintain the existing recreation experience at Carnegie SVRA, but to improve it. Modern OHV recreation management emphasizes well-designed trail systems, clear route designation, sustainable trail

construction, and ongoing maintenance. These strategies simultaneously improve rider experience and reduce environmental impacts.

Research has demonstrated that purpose-built trail systems significantly reduce resource damage by directing recreation activity onto durable surfaces and away from sensitive habitats (Marion & Wimpey, 2017). The final Recreation Management Plan should therefore include:

- Development of additional designated trail mileage where feasible
- Improved trail connectivity across the park
- Sustainable trail design and maintenance standards
- Expanded staging areas and recreation infrastructure
- Ongoing monitoring and adaptive management

Investing in a well-planned trail system will allow Carnegie SVRA to accommodate growing recreation demand while protecting natural resources.

Response to Comment O.2-7:

The comment incorrectly refers to the project as a Recreation Management Plan rather than a Resource Management Area (RMA) Program. The proposed RMA Program includes new or redesigned trail construction in the new RMAs, see EIR section 2.4.2.4 for more information. The new trails-only RMAs are designed to protect natural resources while accommodating OHV recreation, including factoring in connectivity, user interest, and trail difficulty.

Comment O.2-8

Required Revisions to the Draft EIR

To ensure compliance with statutory mandates and CEQA requirements, Cal4Wheel recommends that California State Parks revise the Draft EIR to incorporate the following changes:

1. Explicitly reaffirm the legislative mandate that SVRAs prioritize motorized recreation opportunities.
2. Conduct a comprehensive recreation displacement analysis evaluating potential environmental impacts if riding opportunities are reduced.
3. Incorporate accessibility considerations to ensure equitable access for individuals with disabilities who rely on motorized recreation.
4. Expand economic analysis to fully evaluate the regional economic benefits of Carnegie SVRA.
5. Commit to expansion and improvement of the trail system, including sustainable trail design and additional designated routes where appropriate.
6. Ensure that management alternatives maximize OHV recreation opportunities while balancing resource protection.
7. Adopt adaptive management strategies that allow recreation opportunities to expand as monitoring data demonstrate sustainable resource conditions.

Response to Comment O.2-8:

This comment summarizes the prior comments. See responses to comments O.2-2 through O.2-7 above.

Comment O.2-9

Closing

Carnegie State Vehicular Recreation Area plays an irreplaceable role in providing motorized recreation opportunities for millions of Californians, particularly residents of the San Francisco Bay Area and surrounding urban regions. SVRAs exist specifically to provide motorized recreation opportunities, thus management decisions affecting these areas must be guided by the legislative mandate established in the California Public Resources Code. The Recreation Management Plan therefore represents an opportunity to strengthen Carnegie SVRA's role as a premier motorized recreation destination while ensuring responsible stewardship of the park's natural resources.

Cal4Wheel urges California State Parks to revise the Draft EIR to ensure that the final plan prioritizes motorized recreation opportunities, expands sustainable trail systems, and fully evaluates the broader regional importance of Carnegie SVRA.

California Four Wheel Drive Association would like to be considered an interested public for the RMA Program EIR. Information can be sent to the following address and email address:

Rose Winn
California Four Wheel Drive Association
8120 36th Avenue
Sacramento, CA 95824
rwinn@cal4nrc.com

Response to Comment O.2-9:

See responses to comments O.2-2 through O.2-7 above. California Four Wheel Drive Association is added to a list of commenters requesting notification about the project.

3.3 INDIVIDUALS**3.3.1 Diana Mead****Comment 1.1-1**

Specifically: 3.1 Goals as Defined by the Standard

Component 2. To meet the criteria of sustainable long-term use, soil loss must not exceed restorability (ie. the ability to be restored). PRC5090.02 (c)(4) requires that when OHV recreation areas or trails or portions thereof cannot be maintained to appropriate established standard for sustained long-term use, they shall be closed to use and be repaired to prevent accelerated erosion. Those areas shall remain closed until they can be managed within the soil loss standard or shall be closed and restored. Restoration of these areas means that upon closure of the unit or any portion thereof, the return of land to the contours, the plant communities, and the plant covers comparable to those on surrounding lands or at least those which existed prior to OHV use, as defined PRC5090.11 and 14CCR4970.01

I propose the addition: Should the unit need to be closed and the land either managed or restored, ie. returned to pre OHV use, a reroute of the unit will be submitted to ensure continuity of the adjoining units.

The objective of our DPR, State Parks, OHMVR Division, should always promote sustainable and sustained access. To simply close, and end access to a trail will be perceived as “overkill” to the OHV visitors to Carnegie SVRA. This is especially true if it is only a small portion of the trail and the entire trail is closed.

Response to Comment 1.1-1:

This comment summarizes PRC5090.02 (c)(4) and proposes a trail reroute if an area is closed due to soil loss. There is no specific comment on the proposed RMA Program or the analysis in the EIR. The proposed project may result in the temporary closure of certain areas in Carnegie SVRA as new RMAs are established, but no permanent closures are proposed. Based on the known scale of projects and the 10-year implementation period, it is estimated that rehabilitation projects would not disturb more than 20 acres in any given year. As described in the Draft EIR, the project includes trail network designation, which can utilize existing trails and/or may build new trails and trail connections. See EIR section 2.4.2 for details of RMA Program implementation, including a description of new or redesigned trail construction. The recommended addition is not needed to address a project impact or other analysis in the EIR.

3.3.2 Mike Vandeman

Comment 1.2-1

The same comments apply to ORVs as to mountain bikes: they are both off-road vehicles. There is no good reason to allow any machines (except wheelchairs) on any unpaved trails.

The major harm that mountain biking does is that it greatly extends the human footprint (distance that one can travel) in wildlife habitat. E-bikes multiply that footprint even more. Neither should be allowed on any unpaved trail. Wildlife, if they are to survive, MUST receive top priority!

What were you thinking??? Mountain biking and trail-building destroy wildlife habitat! Mountain biking is environmentally, socially, and medically destructive! There is no good reason to allow bicycles on any unpaved trail!

Bicycles should not be allowed in any natural area. They are inanimate objects and have no rights. There is also no right to mountain bike. That was settled in federal court in 1996: <https://mjvande.info/mtb10.htm> . It's dishonest of mountain bikers to say that they don't have access to trails closed to bikes. They have EXACTLY the same access as everyone else -- ON FOOT! Why isn't that good enough for mountain bikers? They are all capable of walking....

Why do mountain bikers always insist on creating illegal trails? It's simple: they ride so fast that they see almost nothing of what they are passing. Therefore, they quickly get bored with any given trail and want another and another, endlessly! (In other words, mountain biking is inherently boring!)

A favorite myth of mountain bikers is that mountain biking is no more harmful to wildlife, people, and the environment than hiking, and that science supports that view. Of course, it's not true. To settle the matter once and for all, I read all of the research they cited, and wrote a review of the research on mountain biking impacts (see <https://mjvande.info/scb7.htm>). I found that of the seven studies they cited, (1) all were written by mountain bikers, and (2) in every case, the authors misinterpreted their own data, in order to come to the conclusion that they favored. They

also studiously avoided mentioning another scientific study (Wisdom et al) which did not favor mountain biking, and came to the opposite conclusions.

Mountain bikers also love to build new trails - legally or illegally. Of course, trail-building destroys wildlife habitat - not just in the trail bed, but in a wide swath to both sides of the trail! E.g. grizzlies can hear a human from one mile away, and smell us from 5 miles away. Thus, a 10-mile trail represents 100 square miles of destroyed or degraded habitat, that animals are inhibited from using. Mountain biking, trail building, and trail maintenance all increase the number of people in the park, thereby preventing the animals' full use of their habitat. See <https://mjvande.info/scb9.htm> for details.

Mountain biking accelerates erosion, creates V-shaped ruts, kills small animals and plants on and next to the trail, drives wildlife and other trail users out of the area, and, worst of all, teaches kids that the rough treatment of nature is okay (it's NOT!). What's good about THAT?

To see exactly what harm mountain biking does to the land, watch this 5-minute video: <http://vimeo.com/48784297>.

In addition to all of this, it is extremely dangerous: https://mjvande.info/mtb_dangerous.htm .

The latest craze among mountain bikers is the creation of "pump tracks" (bike parks). They are alleged to teach bicycling skills, but what they actually teach are "skills" (skidding, jumping ("getting air"), racing, etc.) that are appropriate nowhere! If you believe that these "skills" won't be practiced throughout the rest of the park and in all other parks, I have a bridge I'd like to sell you!

For more information: <https://mjvande.info/mtbfaq.htm> .

Response to Comment 1.2-1:

This comment is about the impacts of mountain biking on unpaved trails, suggesting the impacts of OHVs are similar. This is an existing OHV park, and the proposed RMA would not alter this baseline condition. There is no specific comment on the proposed RMA Program or the analysis in the EIR. Carnegie SVRA is primarily used for OHV recreation and is not generally used for mountain biking. Specific to OHVs, the proposed RMA Program would provide ongoing sustainable OHV recreation management through reducing trail density, increasing vegetation cover, creating sustainable trails, enforcing trails-only riding, rehabilitating damaged soil surfaces, and implementing soil loss and erosion control measures that disperse storm water runoff to prevent accelerated erosion (see EIR Chapter 2 for more information).

Comment 1.2-2

The common thread among those who want more recreation in our parks is total ignorance about and disinterest in the wildlife whose homes these parks are. Yes, if humans are the only beings that matter, it is simply a conflict among humans (but even then, allowing bikes on trails harms the MAJORITY of park users -- hikers and equestrians -- who can no longer safely and peacefully enjoy their parks).

The parks aren't gymnasiums or racetracks or even human playgrounds. They are WILDLIFE HABITAT, which is precisely why they are attractive to humans. Activities such as mountain biking, that destroy habitat, violate the charter of the parks.

Even kayaking and rafting, which give humans access to the entirety of a water body, prevent the wildlife that live there from making full use of their habitat, and should not be allowed. Of

course those who think that only humans matter won't understand what I am talking about -- an indication of the sad state of our culture and educational system.

Response to Comment 1.2-2:

This comment says that wildlife habitat should be prioritized over recreation, especially mountain biking, kayaking, and rafting. The mission of California State Parks is to provide for the health, inspiration and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation. This park has been an OHV park since the 1960s and was specifically acquired by the state in 1979 for that purpose; the RMA would not alter that condition. The proposed RMA Program would provide ongoing sustainable OHV recreation management through reducing trail density, increasing vegetation cover, creating sustainable trails, enforcing trails-only riding, rehabilitating damaged soil surfaces, and implementing soil loss and erosion control measures that disperse storm water runoff to prevent accelerated erosion (see EIR Chapter 2 for more information). No changes are required to the EIR, and no additional response is necessary.

CHAPTER 4 ERRATA AND REVISIONS

This chapter includes the changes to the Draft EIR needed to respond to comments and clarify or amplify the information provided in the Draft EIR. The changes correct inaccuracies and clarify the analysis in the EIR. Text removed from the EIR is marked with ~~strike-out~~. New text is indicated by underline.

4.1 REVISIONS TO MITIGATION

Mitigation Measures BIO-3a through 3c have been revised as follows:

Mitigation Measure BIO-3a: Protection of Suitable Habitat for Listed/Proposed Amphibians and Reptiles. No new facilities (i.e., new or re-routed OHV trails, trail improvements, or managed hillclimbs) in the RMA Program area shall be sited within 150 feet of aquatic habitat currently known or later identified to support California red-legged frog, California tiger salamander, western spadefoot, or pond turtle. No new facilities in the new or existing RMAs shall be sited within 150 feet of preferred Alameda whipsnake habitat, particularly scrub vegetation types.

To minimize the risk of ensnaring snakes and other wildlife, the project shall not use erosion control materials containing synthetic (e.g., plastic or nylon) monofilament netting or cross joints in the netting that are bound/stitched. Geotextiles, fiber rolls, and other erosion control measures shall be made of loose-weave mesh, such as coconut (coir) fiber, or other products without welded or tight weaves.

Mitigation Measure BIO-3b: Evaluation and Avoidance of Suitable Special-Status Amphibian and Reptile Habitat. Within 14 days prior to the commencement of all ground-disturbing project activities (including but not limited to mobilization and staging, clearing, grubbing, vegetation removal, fence installation, demolition, and grading), a qualified biologist shall conduct a habitat assessment of the project site and a minimum 500-foot radius surrounding the site for the following special-status amphibian and reptile species: California tiger salamander, California red-legged frog, foothill yellow-legged frog-central coast DPS, western spadefoot, pond turtle, Alameda whipsnake, California glossy snake, Northern California legless lizard, coast horned lizard, and San Joaquin coachwhip. The biologist shall look for habitat features, including aquatic habitat such as ponds, streams or drainages, and terrestrial habitat such as outcrops or burrows, with the results of the assessment documented in a written report prior to starting project activities. Habitat features shall be flagged for avoidance. Work in ~~such~~ special-status reptile and amphibian habitat areas may only occur as provided by Mitigation Measure BIO-3c.

A qualified biologist is defined as a biologist that has a degree in biological sciences, or similar degree; knowledge in the life history and ecology of the special-status amphibian and reptile species listed in this measure and locally common amphibians and reptiles and their identification; and a minimum of two field seasons of experience conducting focused surveys with positive identification of special-status and common amphibian and reptile species in the project region.

Mitigation Measure BIO-3c: Protection of Special-Status Amphibians and Reptiles. If suitable habitat is identified for any of the special-status amphibians or reptiles in the habitat assessment or the work site is within the dispersal distance of known occurrences of any of these species, a preconstruction survey for these special-status amphibian and reptile species shall be

conducted by a qualified biologist prior to the start of ground-disturbing project activities per SPRs. The results of the survey shall be documented in writing with GPS locations of any species found recorded for internal tracking. If any of these species are encountered in or near the work site during the habitat assessment or survey, a qualified biologist shall monitor all ground-disturbing work in the work site. If an individual of these species is found during such work, and the qualified biologist determines that the project activities may disturb or harm the individual, the work shall be adjusted or postponed until the animal has been allowed to leave the work site on its own or the qualified biologist determines the work can proceed with no risk to the safety of the individual. The project may also employ protective fencing, rescheduled work times or locations, or other measures determined by the qualified biologist to avoid harm to the individual.

If nesting habitat for pond turtle is found at a project site, exclusion fencing shall be placed prior to egg-laying season (March through August). Exclusion fencing shall be designed to encompass the work site and maintained weekly until construction activities at the work site are completed. If a pond turtle nest is found, a 100-foot no disturbance buffer shall be demarcated around the nest, and no work shall occur until the hatchlings have dispersed. If suitable habitat for Alameda whipsnake is found at a project site, a qualified biologist shall survey ahead of all manual and mechanical work in suitable habitat areas. DPR shall implement temperature restrictions conducive to Alameda whipsnake movement for all ground-disturbing work within suitable habitat to allow for snake dispersal. Work shall be conducted in a manner that avoids all forms of take of amphibian or reptile species that are listed or proposed for listing under CESA or FESA or candidates under CESA. The qualified biologist may relocate an amphibian or reptile that is not listed or proposed for listing or a CESA candidate species to suitable similar habitat outside of the work site.

Mitigation Measures BIO-5 has been revised as follows:

Mitigation Measure BIO-5: Special-Status and Roosting Bat Protection. Not more than 30 days before the start of ground-disturbing activities (including but not limited to mobilization and staging, clearing, grubbing, tree removal, vegetation removal, fence installation, demolition, and grading) in a new or existing RMA, an Environmental Scientist shall survey the work site and a 50-foot buffer for bat roosting habitat (large trees with cavities, rock outcrops, caves, mines). If no roosting bat habitat and/or signs of bats are present, no additional surveys are required.

If bat roosting habitat and/or signs of bats (e.g., guano pellets or urine staining) are identified in the survey, a follow-up dusk emergence survey shall be conducted by a qualified biologist prior to the start of construction activities. A dusk survey will determine the number of bats present and shall also include the use of acoustic equipment to determine species of bats present.

If roosting bats are detected, they shall be avoided with roost avoidance buffers, seasonal activity restrictions, or monitoring of roost locations as determined by a qualified biologist. Bat colonies shall be avoided and trees containing bat roosting habitat shall be removed as described below. The results of the surveys shall be documented with GPS coordinates of any occupied bat roosts recorded for internal tracking.

A qualified biologist is defined as a biologist that has a degree in biological sciences, or similar degree; has at least two years of experience conducting bat surveys that resulted in detections for the relevant species; and is familiar with the types of equipment used to conduct surveys.

Bat Colony Avoidance. If bat colonies are observed at the project site at any time, all project activities shall stop until the qualified bat biologist develops a bat avoidance plan to be implemented at the project site. Once the plan is implemented, project activities may recommence. If a maternity colony is found, there shall be no disturbance to the roost site until the young become volant (after August 31) because they are unable to fly. If a maternal colony is found after construction activities have begun, a no-work buffer area shall be established around the maternal roost.

Tree Removal Methodology. Any trees containing bat roosting habitat (e.g. cavities, crevices, deep bark fissures) shall be marked and removed using a two-day phased method as follows: On day one, under the supervision of a qualified biologist, all limbs not containing bat roosting habitat shall be removed using handsaws or chainsaws only. The next day, the rest of the tree shall be removed.

All trees shall be removed during specified seasonal periods of bat activity: After winter torpor but prior to maternity season – from approximately March 1 (or when night temperatures are above 45°F and when most rains have ceased) through April 15 (when females begin to give birth to young); and prior to winter torpor – from September 1 (when young bats are self-sufficiently volant) until about October 15 (before night temperatures fall below 45°F and rains begin). If tree removal must occur outside of these timeframes, a qualified biologist shall survey the trees to the extent feasible to determine if maternity colonies or winter torpor bats are present. If present, the tree shall not be removed until females have given birth to young and when young bats are self-sufficiently volant, as determined by a qualified biologist.

Mitigation Measures BIO-7 has been revised as follows:

Mitigation Measure BIO-7: American Badger Protection. An Environmental Scientist shall conduct a preconstruction survey for American badger no more than 14 7 days prior to the beginning of ground-disturbing activities (including but not limited to mobilization and staging, clearing, grubbing, tree removal, vegetation removal, fence installation, demolition, and grading) in the new or existing RMAs. The qualified biologist shall search the work site plus a 500-foot buffer for potential American badger dens, burrows, diggings, and other signs of badger activity. If there are no potential American badger dens in the work site or buffer area, no further mitigation is necessary. ~~If potential American badger dens are located within the work site and cannot be avoided, a qualified biologist shall determine if the dens are occupied. If unoccupied, a den can be collapsed in on itself by the qualified biologist if it cannot be avoided by project activities. If occupied, the den shall be avoided with a minimum 100-foot buffer.~~ If a burrow/den is found, a survey shall be performed daily prior to beginning ground-disturbing work. Pre-construction surveys should be repeated as necessary if ground-disturbing activities are delayed or postponed for more than seven days. If burrows or dens are observed within the project area and within 100 feet of the project footprint, the qualified biologist shall monitor them for a minimum of 3 nights. If unoccupied, the den shall be excavated by hand. If the burrow or den is determined to be active, a 100-foot no-work buffer shall be established and monitored for 3 more nights to determine if it is a natal den. If it is a natal den, a 200-foot no-work buffer shall be established around a natal den, and a 100-foot no-work pathway through suitable habitat shall be established to ensure safe passage to and from the den around the work area. A qualified biologist shall monitor the site during work to ensure breeding badgers are not impacted. Buffers shall be enlarged as necessary.

A qualified biologist is defined as a biologist that has a degree in biological sciences, or similar degree; has a minimum of two years of experience surveying for American badger, can identify suitable dens for this species, and is familiar with identification and habitat requirements of this species.

4.2 OTHER REVISIONS

Section S-1:

Draft EIR Summary Table S-1 is revised to reflect changes to mitigation measures noted above. Only impacts with revised mitigation measures are reproduced.

Table S-1. Summary of Potentially Significant Impacts and Mitigation Measures	
Impact	Mitigation Measure
Biological Resources¹	
Impact BIO-3: Project activities could result in the temporary loss of listed/proposed amphibian and reptile dispersal habitat or harm special-status amphibians and reptiles (i.e., California tiger salamander, California red-legged frog, foothill yellow-legged frog – central coast DPS, western spadefoot, pond turtle, Alameda whipsnake, California glossy snake, Northern California legless lizard, Blainville's horned lizard, and San Joaquin coachwhip) if present in the work site and during construction. Less-than-Significant Impact with Mitigation	Mitigation Measure BIO-3a: Protection of Suitable Habitat for Listed/Proposed Amphibians and Reptiles. No new facilities (i.e., new or re-routed OHV trails, trail improvements, or managed hillclimbs) in the RMA Program area shall be sited within 150 feet of aquatic habitat currently known or later identified to support California red-legged frog, California tiger salamander, western spadefoot, or pond turtle. No new facilities in the new or existing RMAs shall be sited within 150 feet of preferred Alameda whipsnake habitat, particularly scrub vegetation types. <u>To minimize the risk of ensnaring snakes and other wildlife, the project shall not use erosion control materials containing synthetic (e.g., plastic or nylon) monofilament netting or cross joints in the netting that are bound/stitched. Geotextiles, fiber rolls, and other erosion control measures shall be made of loose-weave mesh, such as coconut (coir) fiber, or other products without welded or tight weaves.</u> Mitigation Measure BIO-3b: Evaluation and Avoidance of Suitable Special-Status Amphibian and Reptile Habitat. Within 14 days prior to the commencement of all ground-disturbing project activities (including but not limited to mobilization and staging, clearing, grubbing, vegetation removal, fence installation, demolition, and grading), a qualified biologist shall conduct a habitat assessment of the project site and a minimum 500-foot radius surrounding the site for the following special-status amphibian and reptile species: California tiger salamander, California red-legged frog, foothill yellow-legged frog-central coast DPS, western spadefoot, pond turtle, Alameda whipsnake, California glossy snake, Northern California legless lizard, coast horned lizard, and San Joaquin coachwhip. The biologist shall look for habitat features, including aquatic habitat such as ponds, streams or drainages, and terrestrial habitat such as outcrops or

Table S-1. Summary of Potentially Significant Impacts and Mitigation Measures

Impact	Mitigation Measure
(Impact BIO-3 continued)	burrows, with the results of the assessment documented in a written report prior to starting project activities. Habitat features shall be flagged for avoidance. Work in such <u>special-status reptile and amphibian</u> habitat areas may only occur as provided by Mitigation Measure BIO-3c. A qualified biologist is defined as a biologist that has a degree in biological sciences, or similar degree; knowledge in the life history and ecology of the special-status amphibian and reptile species listed in this measure and locally common amphibians and reptiles and their identification; and a minimum of two field seasons of experience conducting focused surveys with positive identification of special-status and common amphibian and reptile species in the project region. Mitigation Measure BIO-3c: Protection of Special-Status Amphibians and Reptiles. If suitable habitat is identified for any of the special-status amphibians or reptiles in the habitat assessment or the work site is within the dispersal distance of known occurrences of any of these species, a preconstruction survey for these special-status amphibian and reptile species shall be conducted by a qualified biologist prior to the start of ground-disturbing project activities per SPRs. The results of the survey shall be documented in writing with GPS locations of any species found recorded for internal tracking. If any of these species are encountered in or near the work site during the habitat assessment or survey, a qualified biologist shall monitor all ground-disturbing work in the work site. If an individual of these species is found during such work, and the qualified biologist determines that the project activities may disturb or harm the individual, the work shall be adjusted or postponed until the animal has been allowed to leave the work site on its own or the qualified biologist determines the work can proceed with no risk to the safety of the individual. The project may also employ protective fencing, rescheduled work times or locations, or other measures determined by the qualified biologist to avoid harm to the individual. <u>If nesting habitat for pond turtle is found at a project site, exclusion fencing shall be placed prior to egg-laying season (March through August). Exclusion fencing shall be designed to encompass the work site and maintained weekly until construction activities at the work site are completed. If a pond turtle nest is found, a 100-foot no disturbance buffer shall be demarcated around the nest, and no work shall occur until the hatchlings have dispersed. If suitable habitat for Alameda whipsnake is found at a project site, a qualified biologist shall survey ahead of all manual and mechanical work in suitable habitat areas. DPR shall implement temperature restrictions conducive to Alameda whipsnake movement for all</u>

Table S-1. Summary of Potentially Significant Impacts and Mitigation Measures

Impact	Mitigation Measure
(Impact BIO-3 continued)	<u>ground-disturbing work within suitable habitat to allow for snake dispersal.</u> Work shall be conducted in a manner that avoids all forms of take of amphibian or reptile species that are listed or proposed for listing under CESA or FESA or candidates under CESA. The qualified biologist may relocate an amphibian or reptile that is not listed or proposed for listing or a CESA candidate species to suitable similar habitat outside of the work site.
Impact BIO-5: Project activities could impact special-status and roosting bats. Less-than-Significant Impact with Mitigation	Mitigation Measure BIO-5: Special-Status and Roosting Bat Protection. Not more than 30 days before the start of ground-disturbing activities (including but not limited to mobilization and staging, clearing, grubbing, tree removal, vegetation removal, fence installation, demolition, and grading) in a new or existing RMA, an Environmental Scientist shall survey the work site and a 50-foot buffer for bat roosting habitat (large trees with cavities, rock outcrops, caves, mines). If no roosting bat habitat and/or signs of bats are present, no additional surveys are required. If bat roosting habitat and/or signs of bats (e.g., guano pellets or urine staining) are identified in the survey, a follow-up dusk emergence survey shall be conducted by a qualified biologist prior to the start of construction activities. A dusk survey will determine the number of bats present and shall also include the use of acoustic equipment to determine species of bats present. If roosting bats are detected, they shall be avoided with roost avoidance buffers, seasonal activity restrictions, or monitoring of roost locations as determined by a qualified biologist. <u>Bat colonies shall be avoided and trees containing bat roosting habitat shall be removed as described below.</u> The results of the surveys shall be documented with GPS coordinates of any occupied bat roosts recorded for internal tracking. A qualified biologist is defined as a biologist that has a degree in biological sciences, or similar degree; has at least two years of experience conducting bat surveys that resulted in detections for the relevant species; and is familiar with the types of equipment used to conduct surveys. <u><i>Bat Colony Avoidance.</i> If bat colonies are observed at the project site at any time, all project activities shall stop until the qualified bat biologist develops a bat avoidance plan to be implemented at the project site. Once the plan is implemented, project activities may recommence. If a maternity colony is found, there shall be no disturbance to the roost site until the young become volant (after August 31) because they are unable to fly. If a maternal colony is found after construction activities have begun, a no-work buffer area shall be established around the maternal roost.</u>

Table S-1. Summary of Potentially Significant Impacts and Mitigation Measures

Impact	Mitigation Measure
(Impact BIO-5 continued)	<u>Tree Removal Methodology.</u> Any trees containing bat roosting habitat (e.g. cavities, crevices, deep bark fissures) shall be marked and removed using a two-day phased method as follows: On day one, under the supervision of a qualified biologist, all limbs not containing bat roosting habitat shall be removed using handsaws or chainsaws only. The next day, the rest of the tree shall be removed. <u>All trees shall be removed during specified seasonal periods of bat activity: After winter torpor but prior to maternity season – from approximately March 1 (or when night temperatures are above 45°F and when most rains have ceased) through April 15 (when females begin to give birth to young); and prior to winter torpor – from September 1 (when young bats are self-sufficiently volant) until about October 15 (before night temperatures fall below 45°F and rains begin). If tree removal must occur outside of these timeframes, a qualified biologist shall survey the trees to the extent feasible to determine if maternity colonies or winter torpor bats are present. If present, the tree shall not be removed until females have given birth to young and when young bats are self-sufficiently volant, as determined by a qualified biologist.</u>
Impact BIO-7: Project activities could harm American badgers if active badger burrows are present in the project work sites. Less-than-Significant Impact with Mitigation	Mitigation Measure BIO-7: American Badger Protection. An Environmental Scientist shall conduct a preconstruction survey for American badger no more than 14 days prior to the beginning of ground-disturbing activities (including but not limited to mobilization and staging, clearing, grubbing, tree removal, vegetation removal, fence installation, demolition, and grading) in the new or existing RMAs. The qualified biologist shall search the work site plus a 500-foot buffer for potential American badger dens, burrows, diggings, and other signs of badger activity. If there are no potential American badger dens in the work site or buffer area, no further mitigation is necessary. If potential American badger dens are located within the work site and cannot be avoided, a qualified biologist shall determine if the dens are occupied. If unoccupied, a den can be collapsed in on itself by the qualified biologist if it cannot be avoided by project activities. If occupied, the den shall be avoided with a minimum 100-foot buffer. If a burrow/den is found, a survey shall be performed daily prior to beginning ground-disturbing work. Pre-construction surveys should be repeated as necessary if ground-disturbing activities are delayed or postponed for more than seven days. <u>If burrows or dens are observed within the project area and within 100 feet of the project footprint, the qualified biologist shall monitor them for a minimum of 3 nights. If unoccupied, the den shall be excavated by hand. If the burrow or den is determined to be active, a 100-foot no-work buffer shall be established and monitored for 3 more nights to determine if it is a natal den. If it is</u>

Table S-1. Summary of Potentially Significant Impacts and Mitigation Measures	
Impact	Mitigation Measure
(Impact BIO-7 continued)	<u>a natal den, a 200-foot no-work buffer shall be established around a natal den, and a 100-foot no-work pathway through suitable habitat shall be established to ensure safe passage to and from the den around the work area. A qualified biologist shall monitor the site during work to ensure breeding badgers are not impacted. Buffers shall be enlarged as necessary.</u> A qualified biologist is defined as a biologist that has a degree in biological sciences, or similar degree; has a minimum of two years of experience surveying for American badger, can identify suitable dens for this species, and is familiar with identification and habitat requirements of this species.

Section 4.1.6:

The 2024 General Plan Update approval was rescinded in June 2026 pending completion of additional CEQA analysis. Section 4.1.6 is updated accordingly:

4.1.6 Carnegie SVRA General Plan Update

The Carnegie SVRA General Plan Update (DPR 2024a) was adopted by the DPR Off-Highway Motor Vehicle Recreation Commission in October 2024 to supersede the 1981 General Plan. The 2024 General Plan Update approval was rescinded in June 2026 pending completion of additional CEQA analysis. Approval of the 2024 General Plan Update has been legally challenged; however, the plan remains in effect pending legal resolution.

The General Plan Update will presents a new broad-based policy document that establishes an updated long-range vision for the SVRA and provides goals and guidelines to direct future improvements, services, and programs. The General Plan Update will defines the broadest possible management framework for program development, ongoing management, and public use of Carnegie SVRA. This framework will ~~is intended to~~ guide day-to-day decision-making and serve as the basis for developing focused feasibility and management plans, project plans, and other management actions necessary to implement General Plan goals.

Section 7.2.4.3:

Crotch's bumble bee was observed at Carnegie SVRA subsequent to release of the Draft EIR. The Draft EIR already determined that the species could be present and included mitigation for potential impacts. Confirmation of Crotch's bumble bee presence within the SVRA thus does not involve a new significant environmental impact or a substantial increase in the severity of an environmental impact (CEQA Guidelines §15088.5). However, Crotch's bumble bee text from the Draft EIR is updated as follows to reflect current data:

**Table 7-4. Special-Status Animals Present or Potentially Present in Carnegie SVRA
Proposed RMA Program Activities Sites:**

Crotch's bumble bee <i>Bombus crotchii</i>	SC	Grassland and scrub habitats supporting abundant floral resources from spring through fall, and undisturbed nesting and overwintering sites. Nests are underground in abandoned holes created by small mammals, or occasionally in bird nests, but may also nest under logs and other woody debris (Xerces Society for Invertebrate Conservation 2018). Overwintering habitat is poorly understood but overwintering queens may overwinter under leaf litter and small cavities in the ground (Osborne, et al. 2008).	May be Present. Suitable grassland and scrub habitats that would provide suitable nesting and foraging habitat are present in Carnegie SVRA. <u>An individual Crotch's bumble bee was observed within the SVRA in June 2026 (Gutberlet, E. pers. observation 2026).</u> There are no recent occurrences of this species in the SVRA, but <u>this species was also recently detected in the Tracy area in 2023 (Bumble Bee Watch 2024) and in the adjacent Alameda-Tesla property in 2023 (Sokolov 2023).</u>
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7.3.2.2 Special-Status Invertebrates

Valley elderberry longhorn beetle (FT) is assumed to be present in Carnegie SVRA based on bore holes indicative of the species detected in elderberry host plants during focused surveys in 2021 (see Table 7-4 in section 7.2.4.3). Crotch's bumble bee (SC) ~~is known to may be present in the SVRA based on a 2026 observation (Gutberlet, E. pers. observation 2026).~~ the presence of suitable grassland and scrub habitat is present and nectar plants are also available. ~~city of nectar plants.~~ Monarch butterfly (FPT) is assumed to occur only as a transient or occasional visitor due to a lack of suitable breeding and winter roosting habitat in the SVRA, and therefore the proposed project is not expected to impact this species.

14.1 Bibliography

The following citations are added in alphabetical order:

Gutberlet, E. pers. observation. 2026. Elizabeth Gutberlet, Environmental Scientist, DPR.

Sokolov, N. 2023. June 30, 2023, observation.
<https://www.inaturalist.org/observations/173844466>