

September 4, 2025

Mr. Todd Smith  
Planning Director  
Sacramento County Office of Planning and Environmental Review  
827 7th Street, Room 225  
Sacramento, CA 95814

Re: Coyote Creek Agrivoltaic Ranch – Coordination and Mitigation Measures for Prairie City State Vehicular Recreation Area

Dear Mr. Smith,

The California Department of Parks and Recreation's Off-Highway Motor Vehicle Recreation (OHMVR) Commission appreciates the opportunity to provide comments regarding the Coyote Creek Agrivoltaic Ranch (CCAR) Project and its relationship with the Prairie City State Vehicular Recreation Area (PCSVRA). Since the Commission's review of the Draft Environmental Impact Report (DEIR) there have been many proposed revisions to the original development plans, as well as response to public comments, including from the California State Department of Parks and Recreation.

The OHMVR Commission appreciates DESRI responding to community requests for a public meeting, per PRC 5090.24 to receive public comment regarding any proposed substantial development project at a location near a State Park. This project is a major industrial development, adjacent to a State Park, with a 200MW solar energy generating station, 100MW battery storage system, new substation, new switchyard, and generation transmission line.

In addition, the proposed solar project is not consistent with Sacramento County's General Plan policies PF-66, PF-78 and PF-79. Public Facilities 78 states that large multi-megawatt solar and other renewable energy facilities should be sited at locations that minimize impacts. Public Facilities 79 states that new solar facilities should be designed and developed to minimize impacts to sensitive biological resources such as oak woodlands and vernal pools, cultural resources (including designated historic landscapes) or farmlands as defined by the CA Department of Conservation. Public Facilities 66 states that the Board of Supervisors and the County Planning Commission may approve, or recommend approval when the County has jurisdiction, of development projects for energy facilities that are contrary to any of the policies (PF 78 and 79) only when justification is provided through findings,

DESRI has proposed many revisions to the original plan and DEIR that have been discussed in one-on-one meetings with Commissioners and CA State Parks staff but have not been documented in writing. In addition, there were significant public comments to the DEIR that must be addressed in the Final Environmental Impact Report (FEIR). The proposed County FEIR public review schedule provides the minimal amount of time – 10 days – to review this complex significantly revised document – which is not sufficient. The OHMVR Commission requests at least 30 days additional review time for public comment.

The OHMVR Commission is concerned about significant and unavoidable impacts to the PCSVRA – with no mitigation proposed in the DEIR to the degree needed. These Impacts will jeopardize the

continued use and enjoyment of the SVRA by the public. The project should avoid, minimize and mitigate for all temporary and permanent impacts to the PCSVRA. These impacts include water supply and usage, blasting and excessive noise, dust from construction activities, and closure of recreation areas and trails during construction. Although mitigation measures have been discussed with CA State Parks staff and Commissioners, these issues are not specifically addressed in the DEIR.

The most significant permanent impact from the project to the user experience is the loss of 1000's of mature blue oak and native oak woodlands that provide a sense of place at the PCSVRA. The project has proposed siting the solar arrays in a way to create corridors to allow reducing the removal of oak woodlands from approximately 4,700 to 3,700 trees – saving about 1,000 trees. These removed mature trees will be replaced at a minimal 1:1 ratio (one sapling for a 100-year-old tree). At least two generations of recreationists at the PCSVRA will not see any blue oak woodlands as they exist today. This mitigation ratio is not adequate and should be at least 3 saplings planted for every mature oak tree removed.

The OHMVR Commission is also concerned about the possible negative economic impacts to the PCSVRA during construction and possibly afterwards. The OHMVR Commission wants to see the best outcome because of this project's entitlements for the CA State Parks, the PCSVRA and the public we serve.

DESRI's response to address our comments and forward a collaborative Project to the benefit of our users, modifications and additions, include:

- Submission and review by Parks of upgrades to the kart track facility that go beyond what is necessary to accommodate the gen-tie line, and that will create an enhanced kart track experience for our users once complete.
- Coordinating with SMUD to relocate a problematic utility pole at the PCSVRA entrance, improving access for users with trailers and eliminating an existing safety concern.
- A \$1,000,000 commitment dedicated to PCSVRA, to support implementation of the PCSVRA Road and Trail Management Plan, provided at the start of project construction.
- Gen-tie pole placement adjustments made by DESRI within the designated corridor to minimize potential impacts on the trail system.
- Mutual acknowledgement proposed by DESRI ensuring that PCSVRA activities, including those that generate noise or dust, will not be restricted due to the adjacent solar project.
- Well impact protections clarified—any new project-related wells will undergo thorough analysis prior to operations to confirm they will not cause drawdown of the PCSVRA well source, with proof required to be submitted to the County.

We are encouraged by the modifications DESRI has made to the solar project site since publication of the DEIR. We will continue to monitor the project to ensure our requests—and DESRI's commitments—are fully reflected in the final entitlements, including in the Final EIR and project certification documents.

Thank you,

Roger Salazar  
Chair  
Off-Highway Motor Vehicle Recreation Commission  
California Department of Parks and Recreation

cc:

OHMVR Commissioners

Sarah Miggins, Deputy Director, OHMVR Division, CA State Parks

Armando Quintero, CA State Director, CA State Parks

William Risse, Director, DESRI

Meghan Knudsen, Senior Manager, DESRI

Michael Butler, Assistant Branch Chief, Department of General Services

Kathryn Tobias, Senior Staff Counsel, CA State Parks

Peter Jones, PC SVRA Manager, CA State Parks

Jim Michaels, Senior Park and Recreation Specialist, Gold Fields District, CA State Parks

Steve Hilton, Gold Fields District Superintendent, CA State Parks