

Draft Comment Letter

August 22, 2026

National Oceanic and Atmospheric Administration

Office for Coastal Management

Section 312 Evaluation

Docket No. 260623-0150

Submitted electronically via: czma.california-evaluation@noaa.gov

RE: Comments on Performance Evaluation of the California Coastal Management Program

Dear NOAA Evaluation Team:

The California Off-Highway Motor Vehicle Recreation Commission (OHMVR Commission) NOAA Evaluation Ad Hoc Committee (Ad Hoc Committee) appreciates the opportunity to comment on NOAA's evaluation of the California Coastal Management Program. The Ad Hoc Committee supports the program's mission to protect California's extraordinary coastal resources while recognizing that the coast also serves important public uses, including responsible motorized recreation where authorized. Public access is a cornerstone of coastal policy, and carefully managed off-highway vehicle recreation provides meaningful outdoor opportunities for Californians and visitors while contributing to local economies.

The California Department of Parks and Recreation (California State Parks) Off-Highway Motor Vehicle Recreation (OHMVR) Division provides statewide leadership in Off-Highway Vehicle (OHV) recreation by acquiring, developing, and managing nine State Vehicle Recreation Areas (SVRAs). The Division balances riding activities with management of natural ecosystems, wildlife habitat, soil health, cultural resources, endangered species, and public safety education. The OHMVR Commission guides this work by reviewing and approving program plans, approving General Plans for State Vehicle Recreation Areas, hearing public ideas and concerns, advising the OHMVR Division on project needs, and by creating reports on program strategies and accomplishments.

California State Parks includes more than 340 miles of coastline across 128 park units (46% of all state park units), including state beaches, state historic parks, state natural reserves, wilderness areas, and one State Vehicular Recreation Area. The Ad Hoc Committee recognizes and supports the important role California's Coastal Management Program has played for nearly fifty years in protecting one of the nation's most extraordinary coastal environments. Its accomplishments in coastal habitat and

ecosystem restoration, coordinated planning, public access, scientific research, resource stewardship, and adaptive management are significant and deserve continued recognition.

For nearly fifty years, California's Coastal Management Program has helped protect ocean and coastal resources while supporting public access and the businesses and jobs that depend on a healthy coast. The Coastal Zone Management Act provides a framework for federal-state coordination in managing California's more than 1,100 miles of coastline and for ensuring public participation in decisions that may significantly affect coastal resources. The Ad Hoc Committee supports this cooperative framework and believes NOAA's evaluation also presents an opportunity to identify practical improvements and efficiencies in its implementation.

One area that merits consideration is whether federal and state coordination can reduce unnecessary duplication in environmental review and permitting while maintaining strong coastal resource protections. State agencies such as California State Parks conduct environmental review under the California Environmental Quality Act and, when working with federal agencies, may also be required to comply with the National Environmental Policy Act. Projects within the coastal zone may be subject to additional coastal review and permitting requirements. California State Parks also brings substantial scientific, natural and cultural resource, planning, and land-management expertise to decisions involving lands under its jurisdiction. The Ad Hoc Committee encourages NOAA to consider opportunities for greater coordination, efficiency, and recognition of existing state-agency review and management processes where requirements overlap, without diminishing applicable environmental protections.

Throughout the State Vehicular Recreation Area (SVRA) system, adaptive management has become a defining management philosophy. Habitat restoration, species monitoring, visitor education, seasonal closures, trail redesign, law enforcement, scientific research, volunteer stewardship, and collaborative planning demonstrate that responsible recreation and natural resource protection can often be advanced together through thoughtful, science-based management. The Ad Hoc Committee believes these same principles should continue to inform discussions regarding coastal recreation opportunities within California's Coastal Management Program. Legal opportunities for motorized beaches and dune recreation have steadily declined during the past five decades, and Oceano Dunes State Vehicular Recreation Area remains California's only state-managed coastal beach providing this unique recreational opportunity. The Ad Hoc Committee does not suggest that every historical coastal riding area should be reopened, nor does it minimize the importance of protecting environmentally sensitive coastal resources. Rather, it encourages continued consideration of adaptive management as a tool for responding to changing conditions while supporting both resource protection and appropriate public access.

The Ad Hoc Committee encourages NOAA to recognize the importance of balancing environmental stewardship with continued recreational access. Effective coastal management should rely on sound science, adaptive management, collaborative planning, and active partnerships with state agencies, local governments, stakeholders, and recreation users so that coastal public lands remain both protected and appropriately accessible.

We appreciate the opportunity to provide these comments and look forward to continued collaboration in support of California's coastal resources and responsible public recreation.

Respectfully submitted,

OHMVR Commission NOAA Evaluation Ad Hoc Committee

DRAFT