



OFF-HIGHWAY MOTOR VEHICLE RECREATION COMMISSION

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September 15, 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.

As a CA State Commission, we strongly support the development of renewable energy production and meeting the state's goals of 30% renewables by 2030. A low-carbon energy future is critical for California's economy, communities, and environment. Achieving this future—and *how* we achieve it—is critical for protecting California's treasured wildlife, landscapes, and diverse habitats. Transitioning to a renewable energy future need not exacerbate the ongoing extinction crisis by thoughtfully planning projects while protecting habitat critical to species.

This project is a major industrial development, adjacent to an Off-Highway Vehicle (OHV) State Park, with a 200MW solar energy generating station, 100MW battery storage system, new substation, new switchyard, and generation transmission line. While we are concerned that the project developers (DESRI) did not include OHV stakeholders, the PCSVRA or the CA State Parks in their initial public scoping or in the draft EIR review process, 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.

Incredibly, the DEIR did not identify ANY alternative sites for this proposed solar project. This is very unusual for any project to not review and analyze additional locations for the proposed project. We are concerned that the project DEIR, and likely the FEIR, are likely flawed because no alternative locations were reviewed or analyzed for the proposed project.

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 urges you to consider 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. There should be net zero impacts to the PCSVRA from the development of this solar project so as to not jeopardize the continued use and enjoyment of the SVRA by the public. The project should seek to “Do No Harm” to the SVRA and 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 there should be at least 3 saplings planted for every mature oak tree removed.

California's oak woodland ecosystems are precious, rare, and increasingly imperiled as climate change, wildfires, and development threaten habitat and biodiversity in these regions. While the deployment of renewable energy is necessary to stabilize the climate and thereby safeguard California's ecosystems, utility-scale solar also pose direct threats to many species and their habitat. The need for thoughtful planning and siting of renewable energy in California to protect these ecosystems cannot be overstated.

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 goes beyond what is necessary to accommodate the gen-tie line, and that will create an enhanced kart track experience for our users once completed.
- 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

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
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