

June 17, 2026

Mr. Todd Smith

Planning Director

Sacramento County Office of Planning and Environmental Review

827 7<sup>th</sup> Street, Room 225

Sacramento, CA 95814

RE: White Rock North Mine Project DEIR – Coordination and Mitigation Measures for Prairie City State Vehicle Recreation Area

Dear Ms. Newton:

The California Department of Parks and Recreation's Off-Highway Motor Vehicle Recreation (OHMVR) Commission appreciates the opportunity to provide comments regarding the proposed White Rock North Mine Project and its relationship to the Prairie City State Vehicle Recreation Area (PCSVRA). The OHMVR Commission and California State Department of Parks and Recreation were only made aware of this project recently.

The Commission strongly urges Sacramento County not to certify the White Rock North Mine DEIR until the document is revised to include a complete and accurate project description, a comprehensive analysis of haul truck traffic and associated air quality, noise, and roadway impacts, and a legally adequate cumulative impact analysis that evaluates long-term effects on the PCSVRA viability. The revised DEIR should be recirculated, and the County and project proponents actively consult with the CDPR as a Responsible Agency under CEQA and a Trustee Agency for the CDPR, which has not occurred to date. Recirculation of the revised DEIR is also required to inform and engage local and regional recreation stakeholders, event organizers, and affected communities, which has not occurred to date. A hearing before the

OHMVR Commission would be appropriate to better inform all OHV recreational users, competitive riders, and power sports businesses impacted by this proposed project.

The siting and long-term operation of an industrial scale gravel mining operation directly adjacent to an active State Park is significant and an incompatible use that will negatively impact the long-term viability of the PCSVRA. Surprisingly, the PCSVRA is not even mentioned in the DEIR as an active recreation area with anywhere from 50,000 to 100,000 visitors annually, and over 20 major special events including agency and public safety training, major motorcycle, OHV, and mountain bike competitions, including the famous Hangtown Motocross Classic that draws 30,000 visitors annually. The Park also hosts four commercial concessionaires that provide valuable services to the recreating public. Other recreational activities include vernal pool hikes, bird watching, dark sky tours, overnight camping, and visitor appreciation days throughout the year. The proposed project will have temporary and permanent impacts on the operation of the PCSVRA, and the DEIR and project proponents need to address these impacts specifically with the Park's management team to ensure they are adequately mitigated. These include significant and unavoidable impacts to air quality and biological resources, including the loss of oak woodlands and native trees. Additionally, the project will have significant impacts on aesthetics, light/glare, special status species, wetlands, and cultural resources. These impacts directly translate to negative impacts on Park visitors from 24-hour mining activities, light pollution affecting camping and dark sky activities, air quality degradation from mining activities, water usage affecting the Parks single water well, and potential impacts to the Aerojet Clean-up and Abatement activities.

The White Rock North Mine Project proposes to mine 2,136 acres of the Aerojet Special Planning Area 24 hours a day and transport 25 million tons of sand and gravel over 20 years that will negatively affect and forever alter the sense of place and recreational enjoyment by thousands of families and visitors to the PCSVRA State Park. The current DEIR is incomplete and does

not address cumulative risks affecting the long-term viability of the PCSVRA. Sacramento County and the project proponent must revise and correct the deficiencies and revise the incomplete environmental analysis of the DEIR and engage C DPR, PCSVRA, and recreation and off-road stakeholders.

Thank you for your consideration,

Sincerely,

Diane Ross-Leech

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

Steve Hilton, Gold Field District Superintendent, CA State Parks

Peter Jones, PCSVRA Manager, CA State Parks

Kathryn Tobias, Senior Staff Counsel, CA State Parks

County Board of Supervisors

County CEO

County Counsel

County Planning Director

Planning Commissioners

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