



May 1, 2026

Sacramento County
Department of Community Development
Planning and Environmental Review Division
827 7th Street, Room 225
Sacramento, CA 95814

RE: White Rock North Mine Project DEIR (PLNP2021-00216) – Action Requested: DO NOT CERTIFY DEIR

Dear Environmental Coordinator,

On behalf of the Motorcycle Industry Council¹ (MIC), Specialty Vehicle Institute of America² (SVIA), and Recreational Off-Highway Vehicle Association³ (ROHVA), collectively the Associations, we submit the following comments on the Draft Environmental Impact Report (DEIR) for the White Rock North Mine Project.

Based on our review, the DEIR is deficient, incomplete, and procedurally flawed. The document fails to meet the disclosure and analysis requirements of the California Environmental Quality Act (CEQA), and should not be certified.

¹ The Motorcycle Industry Council (MIC) is a not-for-profit, national trade association representing several hundred manufacturers, distributors, dealers and retailers of motorcycles, scooters, motorcycle parts, accessories and related goods, and allied trades.

² The Specialty Vehicle Institute of America (SVIA) is the national not-for-profit trade association representing manufacturers, dealers, and distributors of all-terrain vehicles (ATVs) in the United States. SVIA's primary goal is to promote safe and responsible use of ATVs.

³ The Recreational Off-Highway Vehicle Association (ROHVA) is a national, not-for-profit trade association formed to promote the safe and responsible use of recreational off-highway vehicles (ROVs – sometimes referred to as side-by-sides or UTVs) manufactured or distributed in North America. ROHVA is also accredited by the American National Standards Institute (ANSI) to serve as the Standards Developing Organization for ROVs. More information on the standard can be found at <https://rohva.org/ansi-standard/>

I. FAILURE TO COMPLY WITH PRC §5090.24 – OHMVR COMMISSION NOT INFORMED

Public Resources Code §5090.24 requires that the Off-Highway Motor Vehicle Recreation (OHMVR) Commission be “fully informed regarding all governmental activities affecting the program.” The administrative record and DEIR provide no evidence that the OHMVR Commission was formally notified during pre-scoping, engaged during scoping or DEIR preparation, or provided any meaningful opportunity to review or comment on the project. Likewise, there is no indication that California State Parks was consulted early in the process as a managing agency or that Prairie City State Vehicular Recreation Area was treated as a core affected resource.

This is a direct conflict with statutory coordination requirements. As previously noted in correspondence to State Parks, the County’s approach reflects a pattern of procedural compliance without substantive engagement, which undermines both CEQA’s intent and interagency coordination obligations.

II. DEFICIENT STAKEHOLDER ENGAGEMENT

The DEIR process failed to include meaningful outreach to key stakeholders, including OHV recreation users, event organizers, the OHMVR Commission, and adjacent communities likely to experience air quality, traffic, and noise impacts. Instead, the process relied primarily on formal noticing rather than targeted engagement with affected parties.

This deficiency mirrors concerns raised in the Coyote Creek proceedings, where the failure to engage stakeholders early undermined the credibility of the environmental review, generated broad opposition, and contributed to a flawed administrative record. CEQA Guidelines §15201 make clear that public participation is an essential component of environmental review, not a procedural formality.

Across California, there is a well-established pattern in which projects that exclude stakeholders during early planning, combined with incomplete environmental analysis and a lack of transparency in decision-making, result in litigation, delay, and increased costs. The White Rock project now exhibits all of these risk factors.

III. FAILURE TO DISCLOSE FULL PROJECT IMPACTS – HAUL TRUCK TRAFFIC OMISSION

The DEIR’s transportation analysis is materially misleading because it focuses narrowly on construction worker trips and conveyor operations while failing to analyze the foreseeable

hauling of up to 3 million tons of aggregate annually. This omission conceals the project's true operational footprint, which would reasonably include hundreds of daily heavy-duty truck trips on White Rock Road and surrounding regional corridors.

As a result, the DEIR fails to evaluate associated impacts including accelerated roadway degradation and long-term maintenance burdens, increased diesel particulate emissions and dust exposure affecting downwind communities, elevated noise levels that would alter rural character, and heightened traffic safety risks due to increased conflicts between heavy trucks, recreation traffic, and agricultural uses. Under CEQA, these foreseeable off-site impacts must be disclosed and analyzed. Their omission renders the project description incomplete and results in a significant understatement of Vehicle Miles Traveled (VMT), air quality impacts, and overall project intensity.

IV. DEFICIENT CUMULATIVE IMPACT ANALYSIS – ENCROACHMENT AND LOSS OF SVRA VIABILITY

The DEIR fails to adequately evaluate cumulative impacts when considered in combination with the Coyote Creek Agrivoltaic Project and other surrounding development pressures. When viewed together, these projects create a clear and foreseeable pattern of progressive encroachment that effectively “boxes in” Prairie City SVRA.

This encroachment reduces available buffer lands, introduces incompatible industrial and energy uses adjacent to the park, and increases operational conflicts related to noise, dust, access, and visual impacts. Over time, these pressures can recharacterize the SVRA as a non-conforming or incompatible land use, leading to increased complaints, operational constraints, and potential curtailment of recreation activities.

The DEIR does not evaluate this trajectory or its implications. This omission is particularly significant given that Public Resources Code §5090.43 requires that State Vehicular Recreation Areas be managed to ensure the long-term viability of OHV recreation opportunities. A project that incrementally contributes to the degradation or displacement of that use must be evaluated accordingly under CEQA's cumulative impact requirements.

V. REAL-WORLD CONSEQUENCES: LITIGATION AND ENFORCEMENT ARE NOT THEORETICAL

The risks identified in these comments are not speculative. Recent litigation involving aggregate and construction operations in California demonstrates the consequences of failing to fully disclose and mitigate environmental impacts. For example, ongoing legal action reported by the *San Jose Mercury News* - <https://www.mercurynews.com/2026/04/16/prominent-bay-area->

[construction-company-illegally-polluted-river-lawsuit-alleges/](#) - involving Granite Construction alleges unlawful discharge of pollutants into waterways associated with mining operations near Watsonville.

Such cases, along with prior enforcement actions involving quarry operations elsewhere in the state, have resulted in significant financial penalties, mandated mitigation measures, and prolonged legal disputes. These outcomes consistently arise where environmental impacts—particularly those related to water quality, air emissions, and operational intensity—are inadequately analyzed during the CEQA process.

VI. PATTERN OF DEFICIENCY ACROSS RELATED PROJECTS

The deficiencies identified here are consistent with those raised in prior proceedings involving adjacent or related projects. These include the failure to adequately analyze cumulative impacts and land use compatibility issues, the lack of meaningful stakeholder engagement and coordination with managing agencies, and the omission of recreation-specific impact analysis for projects adjacent to Prairie City SVRA.

This pattern further undermines the credibility and defensibility of the DEIR.

VII. ACTION REQUESTED

Given the significant deficiencies identified above, the Associations respectfully request that Sacramento County not certify the DEIR. Instead, the County should revise and recirculate the document 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 comprehensive cumulative impact analysis that evaluates long-term effects on Prairie City SVRA viability.

The County must also comply with Public Resources Code §5090.24 by formally notifying and engaging the OHMVR Commission and coordinating with California State Parks as a responsible agency. In addition, the County should undertake meaningful stakeholder engagement that includes outreach to recreation users, event organizers, and affected communities, and incorporates that input into project design and analysis.

CONCLUSION

Incomplete analysis and insufficient public engagement regarding the White Rock North Mine Project obscures substantial real-world impacts of the project. The failure to evaluate haul truck traffic masks the project's true scale, while the failure to assess cumulative encroachment risks the long-term viability of a major state recreation asset.

As currently drafted, the DEIR does not meet standards required under CEQA.

Thank you for your consideration.

Sincerely,

Don Amador

Don Amador
Western States Representative
MIC Government Relations Office
15635 Alton Parkway, Suite 390
Irvine, CA 92618
[Email: damador@mic.org](mailto:damador@mic.org)

cc: CA State Parks Off-Highway Motor Vehicle Recreation Commission
CA State Parks Off-Highway Motor Vehicle Recreation Division
CA State Parks Rangers Association
Prairie City State Vehicular Recreation Area Stakeholders