Appendix A: Comment Letters

Comment Letter A1

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

September 26, 2025

Katie Metraux
California Department of Parks and Recreation
Doff-Highway Motor Vehicle Recreation Division
P.O. Box 942896
Sacramento, CA 92496

Project: Draft Environmental Impact Report for the Hungry Valley State Vehicular Recreation Area General Plan Update (SCH #2023110034)

District CEQA Reference No: 20250961

Dear Ms. Metraux

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report (DEIR) from the California Department of Park and Recreation (State Parks) for the Hungry Valley State Vehicular Recreation Area General Plan Update (SVRA). Per the DEIR, the project consists of improvements to include a new northern entrance, visitor center, RV campground, roadway upgrades, expanded administrative and maintenance facilities, additional practice tracks, and new amenities such as a community event area, UAV area, and EV charging stations (Project). The Project is located within Los Angeles, Kern, and Ventura Counties near the communities of Gorman and Lebec, adjacent to Interstate 5 at Tejon Pass, the portion in Kern County is in the District's jurisdiction.

The District offers the following comments at this time regarding the portion of the Project in the District's jurisdiction:

1) **Voluntary Emission Reduction Agreement**

Per the DEIR, specifically Table 3.2-17 (Annual Operational Emissions for Comparison to SJVPACD Thresholds) demonstrates operational emissions for the portion of the Project in the District's jurisdiction are expected to exceed the District's significance threshold for PM10. Therefore, the District recommends the DEIR discuss the feasibility of including a Voluntary Emission Reduction Agreement (VERA) for the portion of the Project in the District's jurisdiction.

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achieve off-site emissions reductions.

Per Section 5.0 of the ISR Rule, an Air Impact Assessment (AIA) application is required to be submitted no later than applying for project-level approval from a public agency. As of the date of this letter, the District has not received an AIA application for portion of the Project in the District's jurisdiction . Please immediately submit an AIA application to the District to comply with District Rule 9510 so that proper mitigation and clean air design under ISR can be incorporated into the Project's design for the portion of the Project in the District's jurisdiction. One AIA application should be submitted for the portion of the Project in the District's jurisdiction .

Information about howto comply with District Rule 9510 can be found online at: https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview

The AIA application form can be found online at: https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview/forms-and-applications/

District staff is available to provide assistance and can be reached by phone at (559) 230-5900 or by email at ISR@valleyair.org.

3c) District Rule 4002 (National Emissions Standards for Hazardous Air Pollutants)

In the event an existing building will be renovated, partially demolished or removed, portion of the Project in the District's jurisdiction may be subject to District Rule 4002. This rule requires a thorough inspection for asbestos to be conducted before any regulated facility is demolished or renovated. Information on how to comply with District Rule 4002 can be found online at: https://ww2.valleyair.org/compliance/demolition-renovation/

3d) District Rule 4601 (Architectural Coatings)

The portion of the Project in the District's jurisdiction may be subject to District Rule 4601 since it may utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings. In addition, this rule specifies architectural coatings storage, cleanup and labeling requirements. Additional information on how to comply with District Rule 4601 requirements can be found online at: https://ww2.valleyair.org/media/tkgieusd/rule-4601.pdf

A VERA is a mitigation measure by which the project proponent provides pound-for-pound mitigation of emissions increases through a process that develops, funds, and implements emission reduction projects, with the District serving a role of administrator of the emissions reduction projects and verifier of the successful mitigation effort. To implement a VERA, the project proponent and the District enter into a contractual agreement in which the project proponent agrees to mitigate project specific emissions by providing funds for the District's incentives programs. The funds are disbursed by the District in the form of grants for projects that achieve emission reductions. Thus, project-related impacts on air quality can be mitigated. Types of emission reduction projects that have been funded in the past include electrification of stationary internal combustion engines (such as agricultural irrigation pumps), replacing old heavy-duty trucks with new, cleaner, more efficient heavy-duty trucks, and replacement of agricultural equipment with the latest generation technologies.

In implementing a VERA, the District verifies the actual emission reductions that have been achieved as a result of completed grant contracts, monitors the emission reduction projects, and ensures the enforceability of achieved reductions. After the project is mitigated, the District certifies to the Lead Agency that the mitigation is completed, providing the Lead Agency with an enforceable mitigation measure demonstrating that project-related emissions have been mitigated. To assist the Lead Agency and project proponent in ensuring that the environmental document is compliant with CEQA, the District recommends the environmental document includes an assessment of the feasibility of implementing a VERA.

2) Health Risk Screening/Assessment

Using information provided in the DEIR and emissions estimates from the CalEEMod analysis, the District evaluated the construction health risk assessment for the Project and determined that the portion of the Project in the District's jurisdiction is not expected to have a significant health impact on nearby sensitive receptors.

The DEIR states that the PM10 emissions of operational fugitive dust may be significant. The District recommends that all feasible mitigations possible be implemented to further minimize their impact on the health of the residents of Frazier Park from operational related emissions.

3) District Rules and Regulations

The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. A project subject to District rules and regulations would reduce its impacts on air quality through compliance with the District's regulatory framework. In general, a regulation is a collection of individual rules, each of which deals with a specific topic. As an example, Regulation II

(Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits), and several other rules pertaining to District permitting requirements and processes.

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: https://ww2.valleyair.org/rules-and-planninq/current-district-rules-and-regulations. To identify other District rules or regulations that apply to future projects, or to obtain information about District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (661) 392-5665.

3a) District Rules 2010 and 2201 - Air Quality Permitting for Stationary Sources

Stationary Source emissions include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 (Permits Required) requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 (New and Modified Stationary Source Review) requires that new and modified stationary sources of emissions mitigate their emissions using Best Available Control Technology (BACT).

The portion of the Project in the District's jurisdiction may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits. Prior to construction, the Project proponent for portion of the Project in the District's jurisdiction should submit to the District an application for an ATC. For further information or assistance, the project proponent may contact the District's SBA Office at (661) 392-5665.

3b) District Rule 9510 - Indirect Source Review (ISR)

The portion of the Project in the District's jurisdiction is subject to District Rule 9510 because it will receive a project-level discretionary approval from a public agency and will equal or exceed 20,000 square feet of recreational space.

The purpose of District Rule 9510 is to reduce the growth in both NOx and PM emissions associated with development and transportation projects from mobile and area sources; specifically, the emissions associated with the construction and subsequent operation of development projects. The ISR Rule requires developers to mitigate their NOx and PM emissions by incorporating clean air design elements into their projects. Should the proposed development project clean air design elements be insufficient to meet the required emission reductions, developers must pay a fee that ultimately funds incentive projects to

3e) District Regulation VIII (Fugitive PM10 Prohibitions)

The project proponent may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in Regulation VIII, specifically Rule 8021 - *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities.*

Should the project result in at least 1-acre in size, the project proponent shall provide written notification to the District at least 48 hours prior to the project proponents intent to commence any earthmoving activities pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). Also, should the project result in the disturbance of 5-acres or more, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, the project proponent shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). For additional information regarding the written notification or Dust Control Plan requirements, please contact District Compliance staff at (559) 230-5950.

The application for both the Construction Notification and Dust Control Plan can be found online at: https://ww2.valleyair.org/media/fm3jrbsq/dcp-form.docx

Information about District Regulation VIII can be found online at: https://ww2.vallevair.org/dustcontrol

3f) Other District Rules and Regulations

The portion of the Project in the District's jurisdiction may also be subject to the following District rules: Rule 4102 (Nuisance) and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

If you have any questions or require further information, please contact Michael Corder by e-mail at Michael Corder@valleyair.org or by phone at (559) 230-5818.

Sincerely,

Mark Montelongo
Director of Policy and Government Affairs

Daniel Martinez
Program Manager

Comment Letter A2

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September 30, 2025

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SUBJECT: DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT FOR THE HUNGRY VALLEY STATE VEHICULAR RECREATION AREA GENERAL PLAN UPDATE
STATE CLEARINGHOUSE NO. 2023110034
VENTURA, KERN, AND LOS ANGELES COUNTIES, CALIFORNIA

Dear Katie Metraux:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Program EIR (DEIR) from the California Department of Parks and Recreation (Parks) for the Hungry Valley State Vehicular Recreation Area (SVRA) General Plan Update (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management offish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish *& G.* Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law[2] of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), or the Western Joshua Tree Conservation Act (Fish &G. Code, § 1927 et seq.) the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: California Department of Parks and Recreation, Off-Highway Motor Vehicle Recreation Division

Objective: The objective of the Project is to update the existing General Plan for the Hungry Valley SVRA. Primary Project objectives of the General Plan Update include defining long-range visions and goals and providing direction for future types of improvements, services, and programs. Additionally, the Project includes multiple infrastructure improvements to the SVRA, including new or upgraded administration, maintenance, recreation, and visitor-serving facilities. New visitor-serving facilities may include a new northern public access point, a new public loop trail, a new recreational vehicle (RV) campground with full hookups, additional track facilities, a designated unmanned aerial vehicle area, and a new visitors center. Further, this Project includes various SVRA maintenance and operations activities, such as roadway improvements and upgrades, and additions to the administrative and maintenance buildings.

Location: The Hungry Valley SVRA is located just south of the point where Los Angeles, Ventura, and Kern Counties intersect. The majority of the SVRA is located in Los Angeles and Ventura Counties, while a smaller northern portion lies within Kern County. Hungry Valley SVRA can be accessed via Interstate 5 (I-5). At the halfway point of Hungry Valley SVRA, State Highway 138 bisects I-5 and provides primary access from the southern boundary to the interior of Hungry Valley SVRA, the Alamo Mountain, Hardluck, and other recreation areas in the Los Padres National Forest. The Angeles National Forest is to the south and east. Nearby is the town of Gorman and the communities of Lebec and Frazier Park.

[2] "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

Timeframe: The Hungry Valley SVRA General Plan Update is expected to be utilized for a 30 year duration.

Biological Setting: Hungry Valley SVRA consists of approximately 19,625 acres encompassing several distinct geographic ecoregions such as the San Emigdio Mountains, the Tehachapi Mountains of the Transverse Ranges, the Coast Range, the southern Sierra Nevada, the Central Valley, and the Mojave Desert. A June 2024 wildfire of approximately 10,000 acres in the eastern and southern portions of the park significantly changed the environmental setting at Hungry Valley SVRA. The fire burned much of the habitat and vegetation, charred or altered many of the natural features, and destroyed two on-site structures. Although a major portion of the SVRA was impacted by wildfire, there are several sections that were unaffected by fire.

Over forty vegetation communities exist at Hungry Valley including woodland, chaparral, sagebrush and scrub, riparian and wetlands, and grasslands and herbaceous communities. The diverse population of wildlife found at Hungry Valley includes, but is not limited to, many types of birds, reptiles, insects, and mammals.

Special-status species that have the potential to occur on site, and may be impacted by the Project, include, but are not limited to: blunt-nosed leopard lizard *(Gambelia sila',* Endangered Species Act (ESA)-listed Endangered, California Endangered Species Act (CESA)-listed Endangered, Fully Protected Species (FP)), California condor *(Gymnogyps califomianus',* ESA Endangered, CESA Endangered, FP), least Bell's vireo *(Vireo bellii pusillus',* ESA Endangered, CESA Endangered), golden eagle *(Aquila chrysaetos',* FP), white-tailed kite *(Elanus leucurus',* FP), ringtail *(Bassariscus astutus',* FP), Swainson's hawk *(Buteo swainsonii',* CESA Threatened), Crotch's bumble bee *(Bombus crotchir,* CESA Candidate Species), western burrowing owl *(Athene cunicularia hypugaea',* CESA Candidate Species), monarch butterfly *(Danaus Plexippus',* ESA Proposed Threatened), western Joshua tree *(Yucca brevifolia',* CESA Candidate Species), San Bernadino aster *(Symphyotrichum defoliatunr,* California Rare Plant Rank (CRPR) 1B.2), Palmer's mariposa lily *(Calochortus palmeri* var. *palmeri;* CRPR 1B.2), Robbins' nemacladus *(Nemacladus secundiflorus* var. *robbinsii',* CRPR 1B.2), Big Bear Valley woollypod *(Astragalus leucolobus',* CRPR 1B.2), Tehachapi monardella *(Monardella linoides* ssp. *oblonga',* CRPR 1B.3), American badger *(Taxidea taxus',* California Species of Special Concern (SSC)), pallid bat *(Antrozous pallidus',* SSC), Tehachapi pocket mouse *(Perognathus alticola inexpectatus',* SSC), Townsend's big-eared bat *(Corynorhinus townsendii',* SSC), western mastiff bat *(Eumops perotis califomicus',* SSC), western red bat *(Lasiurus frantzii',* SSC); loggerhead shrike *(Lanius ludovicianus',* SSC), northern harrier *(Circus husdonius',* SSC), yellow-headed blackbird *(Xanthocephalus xanthocephalus;* SSC/ yellow warbler *(Setophaga petechia brewsteri*\ SSC); California glossy snake *(Arizona elegans occidentalism* SSC), coast horned lizard *(Phrynosoma blainvillii',* SSC), coast patch-nosed snake *(Salvadora hexalepis virgultea',* SSC), coastal California whiptail *(Aspidoscelis tigris stejnegeri',* SSC), northern California legless lizard *(Anniella pulchra',* SSC), northwestern *(Actinemys marmorata*\

SSC), southwestern pond turtle *(Actinemys pallida;* SSC), two-striped gartersnake *(Thamnophis hammondir,* SSC), and western spadefoot *(Spea hammondir,* SSC).

Project History: Hungry Valley SVRA was acquired by the State with money from the Off-Highway-Vehicle (OHV) Fund and has been in operation as an officially recognized SVRA since approximately 1980. Prior to its acquisition by the State, most of the land was privately owned, and control of trespass OHV riding was difficult. When the State purchased SVRA lands in 1978, OHV activity was heavy at the upper end of Hungry Valley proper, and moderate in the hills overlooking Gorman and on the southern border of the unit. The original General Plan for the SVRA was adopted in 1981.

A Notice of Preparation (NOP) was submitted for the Project on November 1, 2023. CDFW provided recommendations in the form of a comment letter on December 18, 2023. Recommendations included Crotch's bumble bee surveys, a discussion of Project alternatives, a lighting plan, a discussion and analysis of how the siting of Project facilities and trails are chosen, how management of the Project site has changed since the original General Plan was adopted in 1981, a biological resource inventory, discussion of biological impacts, and proposed mitigation measures for impacts to biological resources.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist Parks in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Additional comments or other suggestions may also be included to improve the document.

COMMENT # 1: Impacts to Biological Resources

Issue: Development facilitated by the Project may impact biological resources.

Specific impact: Direct and indirect impacts to biological resources may result from Project site development. Impacts to biological resources may result in reproductive suppression, mortality, injury to wildlife, and population decline of a special status, sensitive, or rare species or natural community.

Why impact would occur: The DEIR states that over 15 acres of paved surface, 3.5 miles of trails, an electric vehicle charging station, a visitor center, a group campground (approximately 4 acres), an RV campground (approximately 5 acres), and two practice track facilities (totaling approximately 6 acres) would be added to the current Project area. In addition, existing facilities are expected to be maintained, upgraded, or demolished, as needed. The DEIR concludes that the Project's impact on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations; or by CDFW and/or United States Fish and Wildlife Service (USFWS) is less than significant through implementation of the Project's goals and guidelines, and compliance with provisions of the various State and federal regulations.

However, the DEIR also states that visitation to the Hungry Valley SVRA is conservatively estimated to increase by ten percent. Mitigation measures that would offset the increase in impacts included in the Updated General Plan were not included in the DEIR. The included Project Goals and Guidelines are policies that do not prescribe, require, or impose specific actions that would substantially mitigate for impacts to candidate, sensitive, or special status species at a project level. In addition, the DEIR does not require future development facilitated by the Project to undertake any measures to mitigate for impacts to candidate, sensitive, or special status species, other than birds. As a result, the Project may result in unmitigated impacts.

Evidence impact would be significant: The Updated General Plan has identified multiple new areas that will be added to the Hungry Valley SVRA, which will require ongoing management. Further the Updated General Plan describes existing facilities that may undergo changes (e.g., upgrade or demolition) during the life of the General Plan. The Project as described may result in direct physical changes to the environment and impact special status, sensitive, or rare plant or wildlife species, or natural communities. Even when conducted in disturbed areas, indirect impacts from Project activities, including increased noise, could cause impacts to plant or wildlife species. Take under ESA includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting.

Plants with a California Rare Plant Rank (CRPR) of 1B meets the definition of endangered, rare, or threatened species under CEQA (CEQA Guidelines, §15380; CNPS 2022a). Plants with a CRPR of 4 may meet the definition of endangered, rare, or threatened species. CDFW considers Sensitive Natural Communities as threatened habitats having both regional and local significance. Natural communities, alliances, and associations with a State-wide rarity ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the Vegetation Classification and Mapping Program - Natural Communities[3] webpage (CDFW 2025a). Without enforceable mitigation measures, impacts on sensitive natural communities could require a mandatory finding of significance (CEQA Guidelines, § 15065).

Development facilitated by the Project may substantially reduce the habitat of fish and wildlife species; cause fish or wildlife populations to drop below self-sustaining levels; threaten to eliminate plant or animal communities; or substantially reduce the number or restrict the range of endangered, rare, or threatened species [CEQA Guidelines, § 15065(a)(1)], Without appropriate mitigation, the Project may have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species, ora Sensitive Natural Community, in local or regional plans, policies, or regulations, or by CDFW and/or USFWS.

[3] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #1: Future Development - Future development projects on approved Project sites shall conduct the appropriate biological resource and technical studies as part of Project-level analyses including baseline surveys, protocol-level surveys, and tree inventories to confirm the presence of any special status species within or immediate adjacent to proposed impact areas. Focused species-specific surveys shall be required if suitable habitat is present. These surveys shall be performed according to any established CDFW and/or USFWS protocols. Reports shall be prepared that document baseline conditions at the time of Project application, identify constraints, recommend Project redesign, analyze potential effects, and propose mitigation measures that reduce potential impacts to less than significant levels. Biological resources technical studies shall include the following:

1. A complete, recent, assessment of rare, threatened, and endangered species, regionally and locally unique species, and sensitive habitats at the Project site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed shall include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of land around the Project site shall also be addressed. A nine-quadrangle search of CDFWs California Natural Diversity Database[4] (CNDDB) shall be conducted to obtain current information on any previously reported sensitive species and habitat (CDFW 2025b);

2. A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFWs Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities[5] (CDFW 2018). Adjoining habitat areas shall be included where Project construction and activities could lead to direct or indirect impacts offsite;

3. Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the area of potential effect. The Manual of California Vegetation[6] (MCV), shall be used to inform this mapping and assessment (Sawyer et al. 2009);

4. A rare plant assessment using online databases for rare, threatened, and endangered plants, including the California Native Plant Society (CNPS) Online

[4] https://wildlife.ca.gov/Data/CNDDB
[5] https://nrm.dfq.ca.qov/FileHandler.ashxVDocumentID_I 8959
[6] http://veqetation.cnps.org/

Inventory of Rare and Endangered Plants of California[7] (CNPS 2025b) as well as the Calflora's Information on Wild California Plants[8] database (Calflora 2025);

5. A discussion regarding Project-related indirect impacts on biological resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)]; and

6. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project site.

Mitigation Measure #2: Rare Plants - If a rare plant species or a Sensitive Natural Community is detected, Parks shall fully avoid impacts to that species or community. If the Project cannot feasibly avoid impacts to rare plants and associated habitat, or sensitive natural communities, either during Project activities or over the life of the Project, Parks shall provide compensatory mitigation for the loss of individual plants and habitat acres. Impacts on rare plants or a Sensitive Natural Community due to hazard mitigation/remediation should also be mitigated as these impacts would result in permanent loss and perpetual impacts on habitat function and quality. Parks shall provide compensatory mitigation so that there is no net loss of rare plants and habitat, or sensitive natural communities. Compensatory mitigation shall be appropriate for the extent of permanently disturbed habitat. Compensatory mitigation shall be higher for impacts on CRPR 1 species, S1 or S2 Sensitive Natural Community, and Sensitive Natural Community with an additional rank of 0.1 or 0.2. Compensatory mitigation shall be implemented by a qualified restoration ecologist. Parks shall also prepare a Restoration Plan including, at a minimum, success criteria and performance standards for measuring the establishment of rare plants and habitat, responsible parties, maintenance techniques and schedule, five-year monitoring and reporting schedule, adaptive management strategies, and contingencies.

Mitigation Measure #3: Blunt-Nosed Leopard Lizard - CNDDB includes an occurrence within Hungry Valley SVRA (2025b). As blunt-nosed leopard lizard (BNLL) may have the potential to occupy the Project site, a qualified biologist shall conduct a habitat assessment for BNLL within the Project site, and vicinity, with a focus on the low lying and low sloped areas of the Project site. If suitable habitat is identified during these assessments, a qualified biologist shall conduct protocol surveys in accordance with the "Approved Survey Methodology for the Blunt-nosed Leopard Lizard" (CDFW2019) ahead of any ground disturbing Project activities. If surveys indicate the presence or potential presence of BNLL, Parks shall consult with CDFW to discuss how to implement ground-disturbing activities and avoid take.

[7] https://rareplants.cnps.org/
[8] https://www.calflora.org/

Mitigation Measure #4: Western Joshua Tree - The eastern portion of the Project site is within the range of western Joshua tree (WJT), and the Preliminary General Plan notes that Hungry Valley SVRA is home to the westernmost stand of WJT. Prior to any ground disturbance for Project activities within the WJT range, a qualified botanist shall conduct focused WJT surveys to identify the locations, number, and health of individuals as part of the biological technical studies conducted in support of the Project that may impact WJT. WJT is a candidate threatened species under CESA. Under CESA, species classified as a candidate species are afforded the same protection as CESA-listed species. Take of any CESA listed species is prohibited except as authorized by state law (Fish and Game Code, §§ 2080 & 2085). The California State legislature has enacted the Western Joshua Tree Conservation Act (WJTCA), which aims to provide protection of WJT and provides another permitting mechanism for the incidental take of WJT. For unavoidable impacts, Parks shall consult with CDFW and obtain appropriate take authorization under CESA or the WJTCA.

Mitigation Measure #5: CESA ITP - CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. In regard to CESA, take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Consequently, if the Project, Project construction, or any Project-related activity for the duration of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, Parks shall seek appropriate take authorization under CESA prior to implementing or continuing the Project. Appropriate authorization from CDFW may include an ITP, or a Consistency Determination in certain circumstances, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project's CEQA document addresses all Project impacts to CESA listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals shall be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

COMMENT # 2: Updated Biological Surveys

Issue: The DEIR may not accurately reflect the Project site's current biological resources and subsequent impacts to resources.

Specific impact: The DEIR references biological reports from 1997, 2006-2019, and 2020. In addition, the DEIR does not provide details regarding the vegetative communities that may be found within the Project site. As such, the reports included with the DEIR may not accurately represent current Project site conditions, which may result in an inaccurate analysis of potential impacts to biological resources that may result from Project implementation.

Why impact would occur: Topography, resource availability, and species occupation may vary over time. Factors such as periods of drought and inundation, and events such as wildfire may result in changes to vegetative communities and species occupation and utilization of the Project site. As such, sensitive species and/or communities may have established themselves since the last habitat assessment, which was conducted in 2020. Wildlife not previously observed may now be residents and use the Project site for breeding, nesting, or foraging. CDFW generally considers biological surveys and habitat assessments to be valid for a period of one year, and assessments for rare plants to be valid for a period of up to three years.

In order to avoid or fully mitigate for impacts to sensitive species and communities, updated habitat assessments and biological surveys that reflect current conditions of the Project site and adjacent areas should be included in the FEIR.

Evidence impact may be significant: Field verification for the presence or absence of sensitive species and communities is necessary to provide a complete biological assessment for adequate CEQA review (CEQA Guidelines, § 15003(i)).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Recommendation #1: Biological Assessment Surveys - The Final Environmental Impact Report (FEIR) should include updated biological field surveys that accurately describe the current state of the Project site and adjacent areas, as well as provide a comprehensive inventory of biological species that may be present within the Project site and adjacent areas. Surveys should be conducted at the appropriate time of year and time of day when sensitive species are active, or otherwise identifiable, for both plants and wildlife. Based on the survey results, the FEIR should propose avoidance and mitigation for Project impacts to special-status species. Findings from the updated general field surveys should be disclosed in the FEIR for public review.

COMMENT # 3: Increased Recreation

Issue: The Project may increase human and wildlife interactions through the addition of new trails and recreational facilities.

Specific impact: Direct impacts in the form of habitat loss and degradation may occur as a result of the construction of new trails and recreational facilities, as well as from off-trail use from visitors. Impacts to wildlife may include reduced habitat quality, increase in species mortality or injury, reproductive suppression during breeding seasons, or population decline of special-status species. Indirect effects to biological resources, such as noise, trash, and predation of, and by, domestic pets, also occur when trail systems run through natural open spaces.

Why impact would occur: The Hungry Valley SVRA consists of over 19,625 acres. The DEIR states that 15 acres of paved surfaces, 3.5 miles of trails, an electric vehicle charging station, a visitor center, a group campground (approximately 4 acres), an RV campground (approximately 5 acres), and two practice track facilities (totaling approximately 6 acres) would be added to the current Project area. The DEIR conservatively estimates that visitation to the Project area will increase by 10 percent.

High volume recreational use within the trail system will result in increased human and wildlife interaction. Additionally, the Project site and adjacent areas may experience increased noise levels, increased trash or pet waste, and the introduction of unnatural food sources via trash and trash receptacles. Outdoor recreation may also cause distress on individual wildlife, resulting in energetic costs to the animal and a decline in the animals' behavior and overall fitness. Studies have shown that outdoor recreation is the second leading cause of the decline of federally threatened and endangered species on public lands (Losos *et al.* 1995) and fourth leading cause on all lands (Czech *et al.* 2000). Overall, and expansion of recreational trailswill likely lead to an increase in human-wildlife interactions that may result in harm to wildlife and/or humans.

A discussion regarding potential impacts resulting from ongoing recreational activities including an increased human presence within the Project site was not provided, and measures to mitigate for the impacts described above were not included in the DEIR. In addition, the DEIR did not consider that the buildout of the proposed Project may not provide an effective buffer to neutralize edge effects. As such, the undisturbed open space may restrict wildlife movement and may result in increased human disturbance. Habitat in adjacent areas may also be impacted by edge effects, for example, impacts resulting from artificial lighting, introduction of pets and domestic animals, and the potential introduction of invasive and non-native vegetation.

Evidence impact would be significant: The Project area supports a variety of special-status species. Impacts to special-status species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Impacts on the special-status wildlife may require a mandatory finding of significance because the Project may potentially threaten to eliminate a plant or animal community and/or substantially reduce the number or restrict the range of endangered, rare, or threatened species (CEQA Guidelines, §15065). Inadequate avoidance, minimization, and mitigation measures for impacts to special status plant or wildlife species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or United States Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #6: Trail Plan - Parks shall develop a Road and Trails Management Plan (Plan) to govern the development of new trails. The Plan shall include details regarding the installation of appropriate signage and trash receptacles, allowable and prohibited trail uses, and best management practices. Additionally, fence installation and maintenance associated with trail creation and operation may obstruct wildlife movement and result in wildlife injury or mortality due to impalement and/or entanglement (e.g., chain-link fencing). Therefore, the Plan shall include wildlife-friendly fencing and design plans.

Mitigation Measure#?: Public Education - Parks shall install appropriate public information signage at trailheads and/or along trails to: 1) educate and inform the public about wildlife present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife (e.g., dogs on leash, proper waste disposal); and 4) provide local contact information to report injured or dead wildlife. Signage shall be written in language(s) understandable to all those likely to recreate and use the trails. Signs shall not be made of materials harmful to wildlife such as spikes or glass.

Mitigation Measure #8: Trash - All trash receptacles shall be wildlife proof and placed only at trailheads to avoid creating an unnatural food source that may attract nuisance wildlife and to minimize waste in core habitat areas.

Mitigation Measure #9: Activity Restriction - Parks shall place restrictions on types of activities allowed in some areas, such as prohibiting dogs or restricting use of trails near breeding habitat, to aid in minimizing disturbance. Pets shall always be kept on leash and on designated public and pet friendly trails. Hikers shall be encouraged to clean up after their dogs and discourage leaving animal waste as it tends to lead to wildlife avoidance.

Mitigation Measure #10: Compensatory Mitigation - Based on the new impacts identified and disclosed in Recommendation #1) Biological Assessment Surveys, Parks shall provide commensurate compensatory mitigation to offset the temporal and permanent loss of habitat. Habitat shall be replaced at a ratio appropriate to maintain no net loss of habitat values, acreage, and function.

Recommendation #2: Buffer Determination - Parks should identify an appropriate buffer from the trail(s) that would continue to be indirectly affected by the Project (due to edge effects, spreading of invasive species, introduction of light, encroachment, etc.). This buffer of impacts should be justified using technical details such as data, maps, diagrams, and similar relevant information and disclosed in the FEIR.

Recommendation #3: Recreation Discussion - The FEIR should include a discussion regarding potential impacts that Project implementation may have on biological resources and describe measures to be implemented to mitigate for Project related impacts. At a minimum the discussion should include the following potential items: potential impacts of Project activities or Project implementation to influence

wildlife's spatial distribution, abundance, predator avoidance behavior, foraging efficiency, vocal frequency, amplitude, or timing, physiology, and reproductive success; the loss of suitable habitat, encroachment, injury or mortality, ongoing edge effects (i.e., noise), or attraction of nuisance wildlife to trash receptacles; and the effect of outdoor motorbikes and electric bikes (e-bikes) on biological resources. Specifically, e-bikes may lead to changes in habitat; alter diurnal activity patterns; result in excess soil compaction and erosion; and lead to direct, indirect, and/or cumulative impacts. The FEIR should provide an analysis of impacts that may result from the use of e-bikes, as well as provide mitigation measures fortheir use. Additionally, the FEIR should include a description of the types of recreational activities that will be allowed within the Project site, clearly identify the areas that will be open for public access as opposed to activities more limited in their occurrence, as well as discuss how regulations will be enforced.

Recommendation #4: Fencing Designs - Fencing designs should be disclosed and evaluated in the FEIR for potential impacts of biological resources, specifically wildlife movement. Wildlife-friendly fencing should be used and strategically placed in areas of high biological resource value to protect biological resources, habitat, and wildlife movement. CDFW recommends A Landowner's Guide to Wildlife Friendly Fences[9] for information about wildlife-friendly fences (MFWP 2012).

COMMENT #4: Crotch's Bumble Bee

Issue: The DEIR may not provide sufficient avoidance and mitigation for Crotch's bumble bee.

Specific impact: Project implementation and operation may result in potentially significant impacts to Crotch's bumble bee such as loss of foraging resources, changes in foraging behavior, burrow collapse, nest abandonment, reduced nest success, reduced health and vigor of eggs, young, and/or queens, and direct mortality.

Why impact would occur: The DEIR states that Crotch's bumble bee has a high potential to occur on the Project site; however, focused surveys for Crotch's bumble bee have not been completed. Focused bumble bee surveys may assist in analyzing potential impacts to Crotch's bumble bee. In addition, the DEIR does not include discussion regarding Crotch's bumble bee status as a CESA candidate species and does not include mitigation measures for avoidance of Crotch's bumble bee or propose mitigation for impacts to the species. Therefore, impacts to Crotch's bumble bee may occur, which may result in unauthorized take of the species under CESA

Evidence impact would be significant: The California Fish and Game Commission accepted the petition to list the Crotch's bumble bee as a candidate under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. The Project may substantially reduce and adversely modify habitat as well as reduce and potentially impair the viability of populations of

[9] https://nrm.dfq.ca.qov/FileHandler.ashx?DocumentID=134713&inline

Crotch's bumble bee. The Project may also reduce the number and range of the species without considering the likelihood that special status species on adjacent and nearby natural lands may rely upon the habitat that occurs on the proposed Project area. In addition, Crotch's bumble bee has a State Ranking of S1/S2. Specifically, this means that Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often five or fewer populations). Crotch's bumble bee is also listed as an invertebrate of conservation priority under the California Terrestrial and Vernal Pool Invertebrates of Conservation Priority[10] (CDFW 2017). Accordingly, Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #11: Incidental Take Permit - If Crotch's bumble bee is identified within the Project site or adjacent areas, Parks shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish and Game code, § 2080 *et seq.).* Parks shall comply with the mitigation measures detailed in the take authorization issued by CDFW. Parks shall obtain a fully executed take authorization prior to implementing Project activities with potential to impact Crotch's bumble bee.

Mitigation Measure #12: Crotch's Bumble Bee Surveys - Parks shall retain a qualified biologist with the appropriate experience and/or handling permits to conduct focused surveys for Crotch's Bumble Bee. Focused surveys shall follow CDFW's Survey Conditions for California Endangered Species Act (CESA) Candidate Bumble Bee Species[11] (CDFW 2023). Focused surveys shall also be conducted throughout the entire Project site and adjacent areas during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW prior to implementing Project ground-disturbing activities.

Recommendation #5: Crotch's Bumble Bee Discussion - The FEIR should acknowledge that Crotch's bumble bee are designated as a CESA candidate species and afforded full protection under CESA. If the Project may impact Crotch's bumble bee, the FEIR should incorporate measures to mitigate potential impacts to Crotch's bumble bee as well as habitat supporting the species. The discussion should be of a depth and scope that a CESA ITP can be issued based on the analysis provided in the FEIR.

[10] https://nrm.dfq.ca.gov/FHeHandler.ashx?DocumentID=157415&inline
[11] https://nrm.dfq.ca.gov/FileHandler.ashx?DocumentID=213150&inline

COMMENT # 5: Western Burrowing Owl

Issue: The DEIR does not analyze potential impacts to western burrowing owl.

Specific impact: Project activities such as vegetation clearing, grading, trail construction, building construction or demolition, and increased human presence may impact western burrowing owls. The DEIR does not provide analysis of potential impacts to western burrowing owl, nor does it propose mitigation measures to reduce the significance of the impacts to the species.

Why impact would occur: On October 15, 2024, the Fish and Game Commission published a Notice of Findings that designates western burrowing owl as a CESA candidate species (FGC 2024). The DEIR does not acknowledge western burrowing owl as a CESA candidate species. In addition, focused surveys for western burrowing owl have not been performed within the Project site or adjacent areas.

Project activities that have the potential to impact western burrowing owl, their nests or eggs, or destroy or degrade western burrowing owl habitat include grading, disking, cultivation, earthmoving, burrow blockage, heavy equipment compacting and crushing burrow tunnels. In addition, the following activities may have impacts to western burrowing owl populations: eradication of host borrowers; changes in vegetation management (i.e., grazing); use of pesticides and rodenticides; destruction, conversion or degradation of nesting, foraging, over-wintering, or other habitats; destruction of natural burrows and burrow surrogates; and disturbance which may result in harassment of owls at occupied burrows (CDFW 2012). If Project activities overlap with the breeding season for western burrowing owl, there is potential for Project activities to result in abandonment of burrows, burrow collapse, or injury/mortality of owlets. Furthermore, attempts to flush western burrowing owl from the site may disturb, distress, or lead to potential take of individual western burrowing owl. To avoid unauthorized take, the FEIR should incorporate mitigation measures that prescribe focused surveys for the species, and measures to be implemented to ensure full avoidance of the species if detected. If avoidance is not feasible coordination with CDFW to obtain appropriate take authorization is recommended.

Evidence impact would be significant: Western burrowing owl is a species designated as candidate for listing as threatened or endangered pursuant to CESA (Fish & G. Code, § 2050 *et seq.).* Take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Additionally, take of individual western burrowing owl and their nests is defined by Fish and Game Code section 86 and prohibited by sections 3503, 3503.5, and 3513.

Take is defined in Fish and Game Code section 86 as “hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill.” Inadequate avoidance and mitigation measureswill result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any

species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #13: Incidental Take Permit - If an occupied burrow or western burrowing owl is identified within the Project site or adjacent areas, Parks shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish and Game code, § 2080 *et seq.).* Parks shall comply with the mitigation measures detailed in the take authorization issued by CDFW. Parks shall obtain a fully executed take authorization prior to implementing Project activities with potential to impact western burrowing owl.

Recommendation #6: Western Burrowing Owl Discussion - The FEIR should acknowledge that western burrowing owl is designated as a CESA candidate species and afforded full protection under CESA. The FEIR should also provide a thorough discussion of the Project's potential direct and indirect impacts to western burrowing owl. If the Project has the potential to impact western burrowing owl, the FEIR should propose measures to mitigate for potential impacts to the species as well as for habitat that supports the species. The discussion should be of depth and scope that a CESA ITP could be issued based on the analysis provided in the FEIR.

ADDITIONAL COMMENTS

Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's FEIR include the mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The Lead Agency is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

Scientific Collecting Permit. Focused surveys for special-status species (i.e., Crotch's bumble bee) require specific handling permits prior to conducting surveys. Parks should retain a qualified biologist(s) with appropriate handling permits, or should obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish *& G.* Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit

is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFWs Scientific Collection Permits[12] webpage for information (CDFW202c).

Lake and Streambed Alteration. Project activities, as described, have the potential to temporarily and permanently impact hydrological systems and features within the Hungry Valley SVRA and may be subject to CDFWs regulatory authority pursuant to Fish and Game Code 1600 *et seq.* Project activities that substantially change the bed, bank, and channel of any river, stream, or lake are subject to CDFWs regulatory authority pursuant Fish and Game Code section 1600 *et seq.* Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation): (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. “Any river, stream, or lake” includes those that are ephemeral or intermittent as well as those that are perennial and may include those that are highly modified such as canals and retention basins.

CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement (LSAA); therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSAA issuance. For information on notification requirements, please refer to CDFWs LSA webpage[13].

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reportsand negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB website[14] provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

In addition, information on special status native plant populationsand sensitive natural communities, should be submitted to CDFWs Vegetation Classification and Mapping Program using the Combined Rapid Assessment and Releve Form[15].

[12] https://wildlife.ca.goV/Licensing/Scientific-Collecting#53949678
[13] https://wildlife.ca.gov/Conservation/LSA
[14] https://wildlife.ca.gov/Data/CNDDB
[15] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit

Parks should ensure data collected for the preparation of the DEIR is properly submitted.

FILING FEES

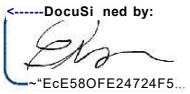
The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist Parks in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that Parks has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

Questions regarding this letter or further coordination should be directed to Riley Scott[16], Environmental Scientist.

Sincerely,



Erinn Wilson-Olgin
Regional Manager
South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife
South Coast Region 5
Victoria Tang, Environmental Program Manager
Steve Gibson, Senior Environmental Scientist (Supervisory)
Frederic (Fritz) Rieman, Senior Environmental Scientist (Supervisory)
Riley Scott, Environmental Scientist

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Central Region 4
Julie Vance, Regional Manager
Krista Tomlinson, Environmental Program Manager
Jeremy Pohlamn, Senior Environmental Scientist (Supervisor)
Bonna Newell, Senior Environmental Scientist (Specialist)
Marile Colindres, Environmental Scientist

State Clearinghouse
Office of Land Use and Climate Innovation
State.Clearinghouse@lci.ca.gov

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ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Mitigation Measure	Timing	Responsible Party
Mitigation Measure #1: Future Developments - Future development projects on Approved Project sites shall conduct the appropriate biological resources technical studies as part of Project-level analyses, including baseline surveys, protocol-level surveys, tree inventories to confirm the presence of any special status species within or immediate adjacent to proposed impact areas. Focused species-specific surveys shall be required if suitable habitat is present. These surveys shall be performed according to any established CDFW and/or USFWS protocols. Reports shall be prepared that document baseline conditions at the time of Project application, identify constraints, recommend Project redesign, analyze potential effects, and propose mitigation measures that reduce potential impacts to less than significant levels. Biological resources technical studies shall include the following: 1. A complete, recent, assessment of rare, threatened, and endangered species, regionally and locally unique species, and sensitive habitats at the Project site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed shall include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of land around the Project site shall also be addressed. A nine-quadrangle search of CDFWs California Natural Diversity Database[17] (CNDDB) shall be conducted to obtain current information on any previously reported sensitive species and habitat (CDFW	Prior to Project Initiation	Project Proponent

[17] https://wildlife.ca.gov/Data/CNDDB

Mitigation Measure	Timing	Responsible Party
2025b); 2. A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFWs Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities[18] (CDFW2018). Adjoining habitat areas shall be included where Project construction and activities could lead to direct or indirect impacts offsite; 3. Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the area of potential effect. The Manual of California Vegetation[19] (MCV), shall be used to inform this mapping and assessment (Sawyer et al. 2009); 4. A rare plant assessment using online databases for rare, threatened, and endangered plants, including the California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants of California[20] (CNPS 2025b) as well as the Calflora's Information on Wild California Plants[21] database (Calflora 2025); 5. A discussion regarding Project-related indirect impacts on biological resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan		

[18] https://nrm.dfg.ca.gov/FileI-landler.ashx?DocumentID=18959
[19] http://vegetation.cnps.org/
[20] https://rareplants.cnps.org/
[21] https://www.calflora.org/

Mitigation Measure	Timing	Responsible Party
(Fish & G. Code, § 2800 et. seq.)]; and 6. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project site.		
Mitigation Measure #2: Rare Plants - If a rare plant species or a Sensitive Natural Community is detected, Parks shall fully avoid impacts to that species or community. If the Project cannot feasibly avoid impacts to rare plants and associated habitat, or sensitive natural communities, either during Project activities or over the life of the Project, Parks shall provide compensatory mitigation for the loss of individual plants and habitat acres. Impacts on rare plants or a Sensitive Natural Community due to hazard mitigation/remediation should also be mitigated as these impacts would result in permanent loss and perpetual impacts on habitat function and quality. Parks shall provide compensatory mitigation so that there is no net loss of rare plants and habitat, or sensitive natural communities. Compensatory mitigation shall be appropriate for the extent of permanently disturbed habitat. Compensatory mitigation shall be higher for impacts on CRPR 1 species, S1 or S2 Sensitive Natural Community, and Sensitive Natural Community with an additional rank of 0.1 or 0.2. Compensatory mitigation shall be implemented by a qualified restoration ecologist. Parks shall also prepare a Restoration Plan including, at a minimum, success criteria and performance standards for measuring the establishment of rare plants and habitat, responsible parties, maintenance techniques and schedule, five-year monitoring and reporting schedule, adaptive management strategies, and contingencies.	Prior to Project Initiation	Project Proponent
Mitigation Measure #3: Blunt-Nosed Leopard Lizard - CNDDB includes an occurrence within Hungry Valley SVRA (2025b). As blunt-nosed leopard lizard (BNLL) may have the potential to occupy the Project site, a qualified biologist shall conduct a	Prior to Project Initiation	Project Proponent

Mitigation Measure	Timing	Responsible Party
habitat assessment for BNLL within the Project site, and vicinity, with a focus on the low lying and low sloped areas of the Project site. If suitable habitat is identified during these assessments, a qualified biologist shall conduct protocol surveys in accordance with the “Approved Survey Methodology for the Blunt-nosed Leopard Lizard” (CDFW 2019) ahead of any ground disturbing Project activities. If surveys indicate the presence or potential presence of BNLL, Parks shall consult with CDFW to discuss how to implement ground-disturbing activities and avoid take.		
Mitigation Measure #4: Western Joshua Tree - The eastern portion of the Project site is within the range of western Joshua tree (WJT), and the Preliminary General Plan notesthat Hungry Valley SVRA is home to the westernmost stand of WJT. Prior to any ground disturbance for Project activities within the WJT range, a qualified botanist shall conduct focused WJT surveys to identify the locations, number, and health of individuals as part of the biological technical studies conducted in support of the Project that may impact WJT. WJT is a candidate threatened species under CESA. Under CESA, species classified as a candidate species are afforded the same protection as CESA-listed species. Take of any CESA listed species is prohibited except as authorized by state law (Fish and Game Code, §§ 2080 & 2085). The California State legislature has enacted the Western Joshua Tree Conservation Act (WJTCA), which aims to provide protection of WJT and provides another permitting mechanism for the incidental take of WJT. For unavoidable impacts, Parks shall consult with CDFW and obtain appropriate take authorization under CESA or the WJTCA.	Prior to Project Initiation	Project Proponent

Mitigation Measure	Timing	Responsible Party
Mitigation Measure #5: CESA ITP - CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. In regard to CESA, take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Consequently, if the Project, Project construction, or any Project-related activity for the duration of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, Parks shall seek appropriate take authorization under CESA prior to implementing or continuing the Project. Appropriate authorization from CDFW may include an ITP, ora Consistency Determination in certain circumstances, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project's CEQA document addresses all Project impacts to CESA listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals shall be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.	Prior to Project Initiation	Project Proponent
Mitigation Measure #6: Trail Plan - Parks shall develop a Road and Trails Management Plan (Plan) to govern the development of new trails. The Plan shall include details regarding the installation of appropriate signage and trash receptacles, allowable and prohibited trail uses, and best management practices. Additionally, fence installation and maintenance associated with trail creation and operation may obstruct wildlife movement and result in wildlife injury or mortality due to impalement	Prior to Project Initiation	Project Proponent

Mitigation Measure	Timing	Responsible Party
and/or entanglement (e.g., chain-link fencing). Therefore, the Plan shall include wildlife-friendly fencing and design plans.		
Mitigation Measure #7: Public Education - Parks shall install appropriate public information signage at trailheads and/or along trails to: 1) educate and inform the public about wildlife present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife (e.g., dogs on leash, proper waste disposal); and 4) provide local contact information to report injured or dead wildlife. Signage shall be written in language(s) understandable to all those likely to recreate and use the trails. Signs shall not be made of materials harmful to wildlife such as spikes or glass.	Project Operation	Project Proponent
Mitigation Measure #8: Trash - All trash receptacles shall be wildlife proof and placed only at trailheads to avoid creating an unnatural food source that may attract nuisance wildlife and to minimize waste in core habitat areas.	Project Operation	Project Proponent
Mitigation Measure #9: Activity Restriction - Parks shall place restrictions on types of activities allowed in some areas, such as prohibiting dogs or restricting use of trails near breeding habitat, to aid in minimizing disturbance. Pets shall always be kept on leash and on designated public and pet friendly trails. Hikers shall be encouraged to clean up after their dogs and discourage leaving animal waste as it tends to lead to wildlife avoidance.	Prior to Project Initiation	Project Proponent
Mitigation Measure #10: Compensatory Mitigation - Based on the new impacts identified and disclosed in Recommendation #1) Biological Assessment Surveys, Parks shall provide commensurate compensatory mitigation to offset the temporal and	After Project Completion	Project Proponent

Mitigation Measure	Timing	Responsible Party
permanent loss of habitat. Habitat shall be replaced at a ratio appropriate to maintain no net loss of habitat values, acreage, and function.		
Mitigation Measure #11: Incidental Take Permit - If Crotch's bumble bee is identified within the Project site or adjacent areas, Parks shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish and Game code, § 2080 *etseq.).* Parks shall comply with the mitigation measures detailed in the take authorization issued by CDFW. Parks shall obtain a fully executed take authorization prior to implementing Project activities with potential to impact Crotch's bumble bee.	Prior to Project Initiation	Project Proponent
Mitigation Measure #12: Crotch's Bumble Bee Surveys - Parks shall retain a qualified biologist with the appropriate experience and/or handling permits to conduct focused surveys for Crotch's Bumble Bee. Focused surveys shall follow CDFWs Survey Conditions for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW 2023). Focused surveys shall also be conducted throughout the entire Project site and adjacent areas during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW prior to implementing Project ground-disturbing activities.	Prior to Project Initiation	Project Proponent
Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The Lead Agency is welcome to coordinate with CDFW to further review and refine the Project's mitigation	Prior to FEIR	Lead Agency

Mitigation Measure	Timing	Responsible Party
measures. Per Public Resources Code section 21081.6(a)(1), CDFWhas provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).		
Scientific Collecting Permit. Focused surveys for special-status species (i.e., Crotch's bumble bee) require specific handling permits prior to conducting surveys. The Project proponent should retain a qualified biologist(s) with appropriate handling permits, or should obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor reject impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFWs Scientific Collection Permits[22] webpage for information (CDFW 2025c).	Prior to Project Initiation	Project Proponent
Lake and Streambed Alteration: The Project activities, as described, have the potential to temporarily and permanently impact hydrological features within the Hungry Valley SVRA and are subject to CDFWs regulatory authority pursuant to Fish and Game Code 1600 et seq. Project activities that substantially change the bed, bank, and channel of any river, stream, or lake are subject to CDFWs regulatory authority pursuant Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b)	Prior to Project Initiation	Project Proponent

[22] https://wildlife.ca.goV/Licensinq/Scientific-Collectinq#539496/8

Mitigation Measure	Timing	Responsible Party
substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation): (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. “Any river, stream, or lake” includes those that are ephemeral or intermittent as well as those that are perennial and may include those that are highly modified such as canals and retention basins. CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement (LSAA); therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSAA issuance. For information on notification requirements, please refer to CDFWs LSA webpage[23].		
Recommendation #1: Biological Assessment Surveys - The Final Environmental Impact Report (FEIR) should include updated biological field surveys that accurately describe the current state of the Project site and adjacent areas, as well as provide a comprehensive inventory of biological species that may be present within the Project site and adjacent areas. Surveys should be conducted at the appropriate time of year and time of day when sensitive species are active, or otherwise identifiable, for both plants and wildlife. Based on the survey results, the FEIR should propose avoidance and mitigation for Project impacts to special-status species. Findings from the updated general field surveys should be disclosed in the FEIR for public review.	Prior to FEIR	Lead Agency
Recommendation #2: Buffer Determination - Parks should identify an appropriate buffer from the trail(s) that would continue to be indirectly affected by the Project (due to edge effects, spreading of invasive species, introduction of light, encroachment,	Prior to FEIR	Lead Agency

[23] https://wildlife.ca.gov/Conservation/LSA

Mitigation Measure	Timing	Responsible Party
etc.). This buffer of impacts should be justified using technical details such as data, maps, diagrams, and similar relevant information and disclosed in the FEIR.		
Recommendation #3: Recreation Discussion - The FEIR should include a discussion regarding potential impacts that Project implementation may have on biological resources and describe measures to be implemented to mitigate for Project related impacts. At a minimum the discussion should include the following potential items: potential impacts of Project activities or Project implementation to influence wildlife's spatial distribution, abundance, predator avoidance behavior, foraging efficiency, vocal frequency, amplitude, or timing, physiology, and reproductive success; the loss of suitable habitat, encroachment, injury or mortality, ongoing edge effects (i.e., noise), or attraction of nuisance wildlife to trash receptacles; and the effect of outdoor motorbikes and electric bikes (e-bikes) on biological resources. Specifically, e-bikes may lead to changes in habitat; alter diurnal activity patterns; result in excess soil compaction and erosion; and lead to direct, indirect, and/or cumulative impacts. The FEIR should provide an analysis of impacts that may result from the use of e-bikes, as well as provide mitigation measures for their use. Additionally, the FEIR should include a description of the types of recreational activities that will be allowed within the Project site, clearly identify the areas that will be open for public access as opposed to activities more limited in their occurrence, as well as discuss how regulations will be enforced.	Prior to FEIR	Lead Agency
Recommendation #4: Fencing Designs - Fencing designs should be disclosed and evaluated in the FEIR for potential impacts of biological resources, specifically wildlife movement. Wildlife-friendly fencing should be used and strategically placed in areas of high biological resource value to protect biological resources, habitat, and wildlife movement. CDFW recommends A Landowner's Guide to Wildlife Friendly Fences for information about wildlife-friendly fences (MFWP 2012).	Prior to FEIR	Lead Agency

Mitigation Measure	Timing	Responsible Party
Recommendation #5: Crotch's Bumble Bee Discussion - The FEIR should acknowledge that Crotch's bumble bee are designated as a CESA candidate species and afforded full protection under CESA. If the Project may impact Crotch's bumble bee, the FEIR should incorporate measures to mitigate potential impacts to Crotch's bumble bee as well as habitat supporting the species. The discussion should be of a depth and scope that a CESA ITP can be issued based on the analysis provided in the FEIR.	Prior to FEIR	Lead Agency
Recommendation #6: Western Burrowing Owl Discussion - The FEIR should acknowledge that western burrowing owl is designated as a CESA candidate species and afforded full protection under CESA. The FEIR should also provide a thorough discussion of the Project's potential direct and indirect impacts to western burrowing owl. If the Project has the potential to impact western burrowing owl, the FEIR should propose measures to mitigate for potential impacts to the species as well as for habitat that supports the species. The discussion should be of depth and scope that a CESA ITP could be issued based on the analysis provided in the FEIR.	Prior to FEIR	Lead Agency

Comment Letter A3

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 266-3574
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

October 2, 2025

Katie Metraux, General Plan Manager
California Department of Parks and Recreation
Off-Highway Motor Vehicle Recreation Division
P.O. Box 942896
Sacramento, California 92496

RE: Hungry Valley State Vehicular Recreation Area General Plan Update - DEIR
SCH# 2023110034
GTS# 07-Multiple-2023-00434
Vic. LA 5 PM: R86.189

Dear Katie Metraux,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed General Plan Update, which is considered the Proposed Project for purposes of CEQA, establishes the long-range purpose and vision for Hungry Valley SVRA and would update the current General Plan which was adopted in 1981. The purpose of Hungry Valley SVRA is to provide a destination for OHV recreation use and to offer a unique experience for visitors in and around the Southern California region. State Parks would manage natural, cultural, and physical resources to protect the resources' integrity in alignment with the goals and guidelines established in the proposed General Plan Update.

After reviewing the DEIR, Caltrans has the following comments:

The project is immediately adjacent to Interstate 5 and crosses multiple county lines, putting elements of the project in both Caltrans Districts 6 and 7. Due to the project's adjacency to I-5, please note that any physical changes to State infrastructure and/or ROW will require a Caltrans encroachment permit. This includes any grading, topography, or equipment work that will change the pattern or direction of water runoff in a way that will impact State facilities or ROW.

If evidence of the above is discovered during the review of the project's various permit and design approvals, a condition of approval for issued entitlements shall include a requirement to work with Caltrans' Office of Permits to obtain the appropriate

encroachment permits. Final design requirements for any proposed changes to infrastructure within or along Caltrans Right-of-way will be determined by the Office of Permits. At the time of permit application there will be rounds of review and corrections to ensure all design, Right-of-way, access management, water runoff, environmental, and statutory requirements are being addressed. Please see their contact information below:

For work in Kern County, please contact District 6:

Caltrans District 6 Office of Permits
Mailing Address: 1352 W. Olive Avenue, Fresno, CA 93728
Office Hours: 8:00 a.m. to 5:00 p.m. Monday-Friday.
Phone:559-488-4058 | E-mail: District6EncroachmentPermits@dot.ca.gov

For work in Los Angeles County or Ventura County, please contact District 7:

Caltrans District 7 Office of Permits
Mailing Address: 100 S Main Street, Ste 100 Los Angeles, CA 90012
Office Hours: 8:00 a.m. to 5:00 p.m. Monday-Friday.
Phone:213-897-3631 | E-mail: D7.Permits@dot.ca.gov

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-Multiple-2023-00434.

Sincerely,

Miya Edmonson

Miya Edmonson
LDR Branch Chief

Q,<z\State Clearinghouse

Comment Letter A4

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT

ALIREZA GHASEMI.PE
Air Pollution Control Officer
4567 Telephone Road. 2nd Floor | Ventura, CA 93003
Phone 805 303 4005 1Fax 805 456 7797

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Katie Metraux, General Plan Manager DATE: October 2, 2025

FROM: Nicole Collazo, Air Quality Specialist, Planning Division NC

SUBJECT: Hungry Valley State Vehicular Recreation Area General Plan Update Environmental Impact Report (RMA 23-019-1)

Ventura County Air Pollution Control District (APCD) staff has reviewed the subject Environmental Impact Report (EIR) for the project referenced above, which analyzed the environmental impacts of the long-range purpose and vision for Hungry Valley SVRA and would update the current General Plan which was adopted in 1981. The Lead Agency is the California Department of Parks and Recreation (State Parks).

APCD has the following comments regarding the project's EIR.

1) Page 3.2-30, MM-AQ-2. The mitigation measure to reduce the amount of NOx emissions during construction activities contains an enforcement mechanism whereby reporting equipment inventory to State Parks is required. In addition to the items listed in the required reporting, APCD recommends reporting of the off-road construction equipment engine Tier certification, which can be found on the engine's emission control label issued by the California Air Resources Board (CARB) or Environmental Protection Agency (EPA). A photo of the label or written engine specifications would be suitable to ensure engine ratings are Tier 4 Interim or Final.

Thank you for the opportunity to comment on the EIR. If you have any questions, you may contact me at nicole@vcapcd.org.

Comment Letter A5

PUBLIC
VENTURA COUNTY
WORKS

WATERSHED PROTECTION

WATERSHED PLANNING AND PERMITS DIVISION
800 South Victoria Avenue, Ventura, California 93009

MEMORANDUM

DATE: September 24, 2025

TO: Philip Hess, Case Planner
County of Ventura

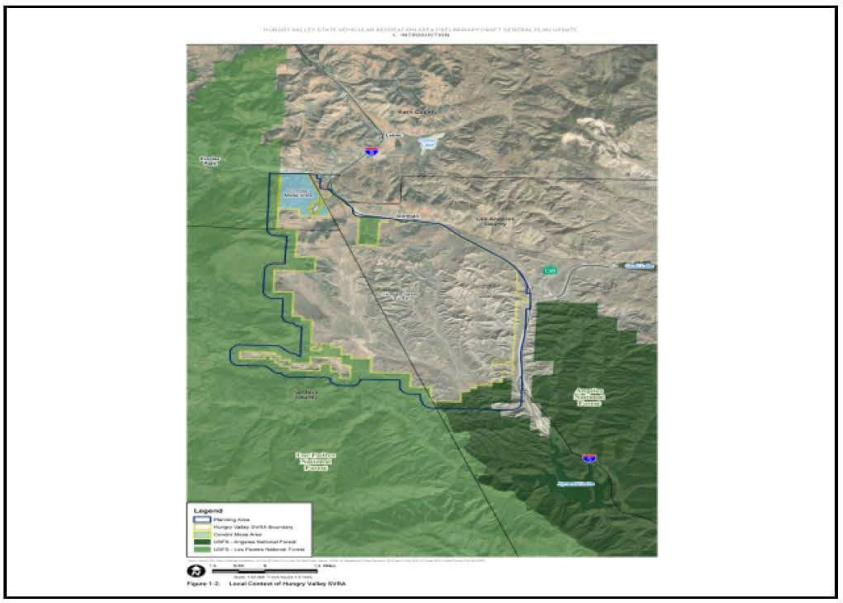
FROM: Yunsheng Su, PWA-WP Case Reviewer

SUBJECT: RMA23-019-1
APN:004025005
CEQA Review Comments and Conditions

Pursuant to your request dated 9/22/2025, this office has reviewed the submitted materials and provides the following comments.

PROJECT LOCATION:

Location Map:



PROJECT DESCRIPTION:

State Parks adopted the first General Plan for Hungry Valley SVRA in 1981. Much has changed in and around Hungry Valley SVRA since adoption of the plan; for example, park conditions have changed, users and types of recreation have varied, new facilities have been constructed or existing facilities modified, acquisitions have occurred, and previous or existing laws and guidelines have changed. Updating the Hungry Valley SVRA General Plan will result in a new broad-based policy document that establishes a long-range vision for Hungry Valley SVRA and provides goals and guidelines to direct future improvements, services, and programs. By providing a clear purpose, a vision, and long- and short-term goals and guidelines, the General Plan defines the broadest possible management framework for program development, ongoing management, and public use of Hungry Valley SVRA. This framework is intended to guide day to-day decision making and serve as the basis for developing focused feasibility and management plans, project plans, and other management actions necessary to implement Hungry Valley SVRA General Plan goals. General plans do not expire; rather, they are reconsidered for amendments or revisions when circumstances and needs dictate, such as when additional land is acquired, or when substantial development considerations arise that were not addressed in the general plan or evaluated during the general plan process.

APPLICATION COMPLETENESS:

Complete - from our area of concern.

ENVIRONMENTAL IMPACT ANALYSIS:

Item 31a. Flood Control Facilities/Watercourses - Ventura County Public Works Agency, Watershed Protection is deemed to be Less Than Significant.

The proposed project is situated about 9999 feet from the , which is a WP jurisdictional redline channel. No new or modified direct stormwater drainage connections to this WP channel, activities within WP's easement, or activities over, under, or within the redline channel appear to be proposed or indicated on the applicant's submitted materials.

This proposed project would result in NO increase of impervious area within the subject property.

WP staff determines that the environmental impact is less than significant (LS) on redline channels under the jurisdiction of the Ventura County Public Works Agency - Watershed Protection.

Item 17b. Hydraulic Hazards - FEMA is deemed to be Less Than Significant.

The project site is in a location identified by the Federal Emergency Management Agency (FEMA) as an area of Minimal Flood Hazard Zone X Unshaded. This is evidenced on FEMA Map Panel 06111C0175E effective January 20, 2010. The proposed development is therefore, deemed to be Less Than Significant for Hydraulic Hazards - FEMA.

WATERSHED PROTECTION COMMENTS:
None.

WATERSHED PROTECTION CONDITIONS:
None.

If you have any questions, please feel free to contact me by email at Yunsheng.Su@Ventura.Org or by phone at 805-654-2005.

END OF TEXT.

Comment Letter A6

December 11, 2025

VIA EMAIL

California Department of Parks and Recreation
Ms. Katie Metraux
PO Box 942896
Sacramento, CA 92496
Katie.Metraux@parks.ca.gov

Assessor Parcel Number(s): SCH Number 2023110034
Property Owner(s): California Department of Parks and Recreation
Project Location Address: 34°47'31.7"N 118°52'17.7"W, Lebec, Frasier Park, CA 93243

PROJECT TITLE: SCH 2023110034 - HUNGRY VALLEY STATE VEHICULAR RECREATION AREA GENERAL PLAN UPDATE

Public Resources Code (PRC) section 3208.1 establishes re-abandonment responsibility when previously plugged and abandoned oil, gas or geothermal wells will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near previously abandoned oil, gas, and geothermal wells.

The California Geologic Energy Management Division (CalGEM) has received the above-referenced project dated August 19, 2025. To assist local permitting agencies, property owners, and developers in making safe and practical land use decisions regarding potential development near oil, gas, or geothermal wells, CalGEM provides a table in the attached enclosure of the wells within the parcel boundary or in its vicinity, based on CalGEM's Well Finder database (https://maps.conservation.ca.aov/doagr/wellfinder/).

The wells listed below are reported to be located within and nearby the parcel boundary and may have future access impeded.

API No.	Well Designation
037-06211	“Bullock” 1
037-06217	“Ralphsanch” 1
037-06218	“Ralphsanch” 2
111-06146	“Little Siberia” 1
111-06147	“Schmidt” 1
111-06306	“Well No.” 1

CalGEM categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking at the landowner's expense if there is a need to access a well. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment (consisting of well servicing rig, pumping equipment, pipe trailer) to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure. Impermeable barriers such as asphalt, concrete, and plastic may trap hazardous gases and liquids underneath and could create a safety hazard if built over a well that later develops a leak.

CalGEM recommends that any well for which access is impeded or built over, against CalGEM's advice, should be evaluated by a qualified petroleum professional for compliance with the statutory objectives of isolating all hydrocarbon-bearing strata; protecting underground and surface waters; prevention of subsequent damage to life, health, property, and other resources; and prevention of loss of oil, gas, or reservoir energy. CalGEM recommends that wells that do not meet these standards are abandoned or re-abandoned prior to construction. The well information can be accessed through CalGEM's Well Finder database mentioned above. PRC section 3208, subdivision (a), provides the primary statutory authority for CalGEM to oversee adequate abandonment of wells. Additionally, CalGEM has developed the regulatory guidance for operators to be followed during well abandonment, which are listed within California Code of Regulation, title 14 (CCR) section 1723 and associated sub-sections (for onshore wells), and section 1745 and associated sub-sections (for offshore wells).

There is no guarantee that a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. Due to the inability to predict all subsurface conditions or changes, it always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. CalGEM acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantee that such abandoned wells will not leak.

CalGEM advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations in Latitude and Longitude, NAD 83 decimal format, and leak testing results should be provided to CalGEM. CalGEM expects any wells found leaking to be reported to CalGEM immediately.

Should any wells require abandonment or re-abandonment, the responsible party must submit a Notice of Intention (NOI) to CalGEM through WellSTAR. The NOI form can be accessed in the 'Plugging and Abandonment' section of the following link: https://www.conservation.ca.gov/calgem/for_operators. No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. CalGEM also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR section 1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below the surface of the ground. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from CalGEM is required before work can start.

CalGEM makes the following additional recommendations to the local permitting agency, property owner, and developer:

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, CalGEM recommends that information regarding the below identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.
2. CalGEM recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

As indicated in PRC section 3106, CalGEM has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to CalGEM's authority to order work on wells pursuant to PRC sections 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC sections 3236, 3236.5, and 3359 for violations within CalGEM's jurisdictional authority. CalGEM does not regulate grading, excavations, or other land use issues.

PRC section 3208.1 gives CalGEM the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for re-abandonment as:

1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.
2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be re-abandoned, or to follow the advice of the supervisor or district deputy not to undertake construction that impedes access, then the person or entity causing the construction over or near the well shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.
3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the re-abandonment.

Should you have any questions, or if any wells are encountered that were not part of this letter, contact CalGEM at (805) 465-9623 or via email at CalGEMNorthern@conservation.ca.gov.

Sincerely,

Amir Mosheni

Amir Mosheni
Supervising Oil and Gas Engineer

RO:IA:es

cc: Ms. Katie Metraux - Senior Park and Recreation Specialist, Katie.Metraux@parks.ca.gov

Comment Letter T1

DeBrito, Danny

To: Metraux, Katie@Parks
Subject: RE: Hungry Valley State Vehicular Recreation Area, General Plan Update

From: Sarah Brunzell <Sarah.Brunzell@tataviam-nsn.us>
Sent: Tuesday, September 23, 2025 2:05 PM
To: Metraux, Katie@Parks <Katie.Metraux@parks.ca.gov>; Avila, Jairo@Parks <Jairo.Avila@parks.ca.gov>; Ptomey, Steven@Parks <Steven.Ptomey@parks.ca.gov>
Cc: THCP CRMD <crm@tataviam-nsn.us>; Kimia Fatehi, Chief of Staff <kfatehi@tataviam-nsn.us>; Miguel Luna, Chief Administrative Officer <Miguel.Luna@tataviam-nsn.us>
Subject: Re: Hungry Valley State Vehicular Recreation Area, General Plan Update

Dear Katie, Jairo and Steven,

Itwas a pleasure meetingwith you. Thankyou for takingthe time to provide a synopsis of the General Plan Update for the Hungry Valley State Vehicular Recreation Area.

As discussed, the Cultural Resources Management (CRM) Division of the Fernandeho Tataviam Band of Mission Indians (FTBMI) has no comments for the General Plan Update. The CRM Division of the FTBMI is pleased with California State Parks' current outreach and consultation process as well as our current arrangement with California State Parks for the FTBMI's project intake and consultation forms.

The Tribe would like to be involved with interpretative design and education as Katie suggested. I've copied Chief of Staff Kimia Fatehi (kfatehi@tataviam-nsn.us) for coordination of these efforts.

Thanks again and have a great rest of your week.

Kind Regards,

Please submit all proposed Projects via our Mandatory Digital Project Intake Form:

https://www.tataviam-nsn.us/project-intake/

Sarah Brunzell
Manager

Cultural Resources Management Division
Tribal Historic and Cultural Preservation Department

Fernandeno Tataviam Band of Mission Indians
1019 Second Street
San Fernando, California 91340
Office: (818) 837-0794

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Comment Letter O1

DeBrito, Danny

From: Squarespace <form-submission@squarespace.info>
Sent: Wednesday, August 20, 2025 9:07 AM
To: DeBrito, Danny
Subject: Form Submission - Public Comment Form - Hungry Valley

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Sent via form submission from *Hungry Valley*

Name: Rusty Ryan

Email: rustytdm7@gmail.com, accepts marketing: true

Subject: Hungry Valley

Message: I'm the regional manager for CORVA, California Off Road Association and would like to say we have worked with Lori Wear in the past, in sayingthatyou have our support and look forward to having Hungry Valley fully open.

Manage Submissions.

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Comment Letter O2

Gmail **Hungry Valley SVRA General Plan and EIR <Info@planhungryvalley.com>**

Hungry Valley SVRA Draft General Plan Comments

Ed Stovin <motoed@hotmail.com> Mon, Sep 29, 2025 at 10:18 PM
To: "info@PlanHungryValley.com" <info@planhungryvalley.com>

Thank you for the opportunity to comment on the draft General plan for Hungry Valley SVRA. I am commenting on behalf of the San Diego Off Road Coalition. SDORC members occasionally recreate in Hungry Valley and appreciate recreating in a well-managed park.

On page 2-11 it says "Parcels currently identified as future target acquisition areas for the SVRA were added to ensure that they receive consideration in the planning process" We appreciate that the park is interested in future acquisitions.

Park users can access Los Padres National Forest right through the park. Park users appreciate this access and I have personally experienced and enjoyed this.

In section 2-12 Vision, we would like to see more language about preserving OHV opportunities in the park vision statement.

Section 2-5 states "Distributed Riding: Hungry Valley SVRA has an approximately 3,200-acre Distributed Riding Area that provides a unique opportunity for open off-trail riding throughout the main portion of the park." But then in section 2-17 "The Proposed Project would not change management of the Distributed Riding Area; however, the boundaries of the area would be adjusted to offer approximately 2,400 acres of distributed riding area." This loss of 800 acres is a problem for the OHV recreating public. We are asking the park to make mitigation on these 800 acres by opening 800 acres of distributed (open) use elsewhere inside Hungry Valley boundaries.

Section 2-19 states "The Proposed Project would repave Gold Hill Road (RI) and would pave Hungry Valley Road (R2) and Quail Canyon Road (R3), to improve circulation and minimize dust generation in the park." We appreciate this work to reduce dust as well as make traveling in the park easier.

Section 2-21 states "Mobile concessions (MCs) for seasonal use and/or special events are proposed as an allowable use within the Quail Canyon Special Event Area. These would be non-permanent vendors that temporarily would occupy the Quail Canyon Special Event Area and sell food, merchandise, or other goods. The permanent concessions (PCs) facility near the ATV Campground would remain as is." We request that mobile concessions be allowed anywhere in the park where an event has a basecamp. This is important because there will be events in the park that may have a basecamp somewhere besides Quail Canyon. These events should be allowed to have food or merchandise vendors. Speaking of events, the draft does not clearly discuss events in the park. We would like to make sure that events such as poker runs, geocaches, weddings, birthdays etc. be allowed throughout the park. Both traveling and non-traveling events should be allowed.

Section 3 13 10 says "CO Guideline 1.2 Consider preserving the character of Hungry Valley SVRA by having the Hungry Valley SVRA District Superintendent or designee limit the overall number and areas for concessions. CO Guideline 3.2 Restrict staging areas for mobile concessions to designated areas within Quail Canyon, to minimize impacts on the visitor experience and natural and cultural resources." While the recreating community appreciates the park's efforts to protect the visitor experience and resources, we feel that mobile concessions when accompanying events has the potential to enhance the events without negative impacts.

We appreciate "SE Goal 1 Provide opportunities for a wide range of special events that minimize impacts on natural, cultural, and physical resources, and are compatible with overall management of Hungry Valley SVRA." SVRAs are defined as areas where OHV related events can take place. Please continue to allow special events in Hungry Valley.

We appreciate "SE Goal 4 Continue to allow opportunities to host special events within the Quail Canyon Special Event area and the proposed community event area in Condor Mesa. SE Guideline 4.2 Consider allowing the use of special event facilities and areas at Quail Canyon and Condor Mesa for other activities when they are not in use for special events, if those activities do not affect sensitive resources or the enjoyment of visitors."

We appreciate the planning of a new entrance to the park "additional vehicular access entry (A3) is proposed from Frazier Mountain Road to the proposed Condor Mesa RV Campground (G3) in the northwestern corner of the SVRA".

I was quite surprised to see in the biological section 3.3-22, that black bears, wolves and mountain lions have been spotted in the park. Are there any precautions park guests should take when camping or recreating?

We very much appreciate 3.3-29 "NR Goal 1 Manage Hungry Valley SVRA to maintain a high-quality OHV recreational experience and foster protection and stewardship of natural resources." and "NR Goal 7 Encourage balanced uses that allow for the restoration or enhancement of natural habitats while maintaining a quality OHV recreational experience."

One of my favorite parts of the draft plan has to do with one-way trails. Section 3 14 5 says "Transportation OHV Guideline 3.3 Evaluate circulation patterns and the need for one-way and vehicle-specific trails." As a motorcycle rider, I am terrified of head on accidents. One-way trails offer park users a chance to "open up" and ride/drive hard without the fear of a terrible accident. We encourage the park to evaluate and designate a series of one way trails in the park to allow safe use of the trails.

Hungry Valley SVRA serves a large population of OHV users from the greater Los Angeles area and beyond. There is precious little OHV opportunity outside of desert areas in Southern California and the OHV community appreciates the OHMVR making a careful and thorough draft management plan for this treasured park.

Ed Stovin
President San Diego Off Road Coalition
President Friends of Ocotillo Wells
San Diego County Fish and Wildlife Commissioner
BLM Desert Advisory Council Member

Comment Letter O3

California Off-Road Vehicle Association (CORVA)
1520 West El Camino Ave. #352
Sacramento, CA 95833-1945
corva.org

California Department of Parks and Recreation
Planning Division - Hungry Valley SVRA General Plan Update
Katie Metraux, General Plan Manager
Off-Highway Motor Vehicle Recreation Division
P.O. Box 942896
Sacramento, California 94296

Re: Public Comment on Draft General Plan and Draft Environmental Impact Report for Hungry Valley State Vehicular Recreation Area

Dear Planning Team,

On behalf of the California Off-Road Vehicle Association (CORVA), I would like to thank the State Parks Planning Department for the comprehensive and thoughtful work reflected in the Draft General Plan and Draft Environmental Impact Report (EIR) for Hungry Valley State Vehicular Recreation Area (SVRA). The scope of the document and the care taken to address such a wide range of issues demonstrates the commitment of the Department to both recreation and stewardship. We appreciate the opportunity to review and provide comments on this important plan.

Support for the Draft General Plan

CORVA strongly supports the reaffirmation of Hungry Valley's central purpose: to provide high-quality off-highway vehicle (OHV) recreation opportunities consistent with the legislative intent of California's Off-Highway Motor Vehicle Recreation (OHMVR) program. Hungry Valley is one of the most heavily visited SVRAs in the state, and its role as a cornerstone of OHV recreation cannot be overstated.

We applaud provisions that expand visitor-serving facilities, enhance trail connectivity into adjacent U.S. Forest Service lands, and strengthen opportunities for OHV special events. We also recognize the urgent need to modernize Hungry Valley's infrastructure — circulation roads, campgrounds, staging areas, and administrative facilities — to meet the needs of today's visitors while ensuring environmental sustainability. These upgrades will help reduce dust, improve safety, and enhance the overall visitor experience.

We further appreciate that the plan identifies parcels for future acquisition, ensuring that Hungry Valley will have the opportunity to grow in a way that sustains recreation. Park users also deeply

value the ability to access Los Padres National Forest directly from Hungry Valley, and this connectivity is one of the park's most treasured assets.

Concerns and Recommendations

While CORVA supports the majority of the Draft General Plan and Draft EIR, we respectfully submit the following concerns and recommendations for your consideration:

1. Vision Statement (Section 2-12)
The vision statement should more explicitly recognize the park's core purpose of preserving and enhancing OHV opportunities. Language that directly affirms OHV recreation as central to Hungry Valley's identity will strengthen public confidence in the plan and align with the statutory mission of the OHMVR program.

2. Distributed Riding Area (Sections 2-5 and 2-17)
The Draft Plan states that Hungry Valley currently has a 3,200-acre Distributed Riding Area but proposes reducing it to approximately 2,400 acres. This loss of 800 acres is highly concerning to the OHV community, as distributed riding provides a unique recreation experience that cannot be replicated elsewhere. CORVA respectfully requests that the reduction be mitigated by opening an equivalent 800 acres of distributed (open) riding elsewhere within Hungry Valley's boundaries. Maintaining distributed riding acreage to the greatest extent possible is essential to preserving visitor satisfaction and upholding the park's legislative purpose.

3. Mobile Concessions and Special Events (Sections 2-21 and 3.13.10)
The plan allows mobile concessions within the Quail Canyon Special Event Area but restricts them elsewhere. CORVA requests flexibility to allow mobile concessions at any event basecamp throughout the park. Events held outside Quail Canyon should also have the opportunity to host food and merchandise vendors, which greatly enhance the experience for participants.

Additionally, the Draft Plan does not clearly address the full range of events that occur in Hungry Valley. We strongly urge that both traveling and non-traveling events such as poker runs, geocaches, weddings, birthdays, and similar gatherings continue to be permitted. These events are part of the fabric of OHV recreation and community life within the park. While we understand the need to protect natural and cultural resources, carefully managed events can coexist with strong resource protections.

4. Condor Mesa Trail Design
CORVA welcomes the inclusion of the Condor Mesa property into the SVRA. While we understand that it is appropriate to manage Condor Mesa under a Trails Only framework, we urge State Parks to design a robust and diverse trail network that utilizes as much of the terrain as possible. A well-planned system will disperse use, protect sensitive resources, and maximize the recreational value of this newly added land.

5. Closures for Restoration
We recognize the need for temporary closures to allow for soil stabilization or habitat restoration. However, these closures should always be time-limited, science-based, and offset by equivalent recreation opportunities elsewhere in the park. Permanent or indefinite closures risk eroding public trust and diminishing the long-term viability of OHV recreation at Hungry Valley.

6. Air Quality and Dust Mitigation
The Draft EIR identifies fugitive dust and Valley Fever exposure as significant and unavoidable impacts. CORVA believes more can be done to mitigate these effects without restricting OHV opportunities. We specifically recommend the use of **Organic Trail Dressing —** wood pulp, sawdust, or wood chips — as a feasible mitigation measure under CEQA.

Organic trail dressing offers multiple benefits:

- Reduces fugitive dust at the source.
- Stabilizes soil and encourages recovery of native vegetation.
- Avoids reliance on chemical suppressants that may harm sensitive habitats.
- Provides a beneficial reuse of wood products from wildfire restoration projects, supporting broader ecosystem recovery.

This method should be seriously evaluated as part of the Final EIR because it directly addresses dust impacts while enhancing sustainability.

7. Alternatives Analysis
The Draft EIR identifies the Reduced Intensity Alternative as “environmentally superior.” CORVA disagrees with this conclusion, as that alternative reduces OHV access without significantly lowering dust emissions. A Modified Proposed Project — one that maintains strong OHV recreation opportunities while implementing more robust dust mitigation measures — better balances CEQA requirements with the legislated mission of SVRAs.

8. Special Events and Economic Benefit
Hungry Valley plays a central role in California’s OHV culture and economy. Events hosted at the SVRA generate revenue for local businesses and provide family-based recreation for thousands of visitors each year. CORVA supports the provisions for Quail Canyon and the proposed Condor Mesa event area, but we recommend streamlined permitting processes and expanded facilities to better support youth-focused and community OHV events.

9. Trail Safety: One-Way Trails (Section 3.14.5)
CORVA strongly supports the evaluation and designation of one-way trails. As a motorcycle rider, I have personally experienced the fear of head-on collisions. One-way trails offer riders the ability to travel safely and with greater confidence, while reducing the likelihood of serious accidents. We

urge the park to move forward with designating one-way and vehicle-specific trails where appropriate.

10. Wildlife Observations (Section 3.3-22)
The Draft EIR notes the presence of black bears, wolves, and mountain lions in the park. This was surprising to many in our community, and we encourage State Parks to provide clear guidance for visitor safety when camping or recreating in areas where these species may be present.

Conclusion

Hungry Valley SVRA serves a vast population of OHV users from the greater Los Angeles area and beyond. In Southern California, OHV opportunities are scarce outside of desert areas, making Hungry Valley an especially treasured resource.

CORVA appreciates the thoughtful and thorough work that has gone into preparing this Draft General Plan and Draft EIR. We respectfully request that the Final Plan:

- Preserve distributed OHV acreage to the greatest extent possible.
- Incorporate organic trail dressing as a feasible dust mitigation strategy.
- Allow flexible concessions and clearly authorize both traveling and non-traveling events.
- Design robust trails in Condor Mesa that maximize recreational value.
- Use only time-limited and science-based closures.
- Evaluate and implement one-way trails to improve safety.

We stand ready to collaborate with State Parks on stewardship, monitoring, education, and trail management initiatives to ensure Hungry Valley remains a model of sustainable motorized recreation.

Respectfully submitted,

Mike McGarity

President
California Off-Road Vehicle Association (CORVA)

Comment Letter O4

October 2, 2025

California State Parks OHV Division
Katie Metraux, General Plan Manager
Off-Highway Motor Vehicle Recreation Division
P.O. Box 942896
Sacramento, California 94296

Submitted via email to: info@PlanHungryValley.com

RE: Hungry Valley SVRA General Plan Update Draft Environmental Impact Report

Dear General Plan Update Planning Team,

California Four Wheel Drive Association (Cal4Wheel) is writing to provide feedback for the Draft Environmental Impact Report (DEIR) for the Hungry Valley SVRA General Plan Update[1], hereto forward referred to as the DEIR. Many of our members and supporters live near and/or recreate throughout Hungry Valley SVRA (HVSVRA). This letter of comment shall not supplant the rights of other Cal4Wheel agents, representatives, clubs, or individual members from submitting their own comments; CA State Parks should consider and appropriately respond to all comments received for the DEIR.

Cal4Wheel is a non-profit organization, representing over 3,500 members, that champions responsible off-highway vehicle (OHV) recreation and encourages a strong conservation ethic and individual stewardship. We advocate for responsible use of public lands for the benefit of the general public and all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access by working collaboratively with public land managers and other recreationists. Our members use OHVs of all forms, as well as other motorized methods, to enjoy federally and state managed public lands throughout California, including CA State Parks managed public lands. Cal4Wheel members visit CA State Parks public lands for motorized recreation to participate in non-motorized and human-powered activity such as sightseeing, photography, dark sky celestial observation, hiking, fishing, wildlife and nature study, camping, observing cultural resources, and other similar pursuits on a frequent and regular basis throughout every season of the year. Additionally, our member clubs enjoy holding events on CA State Parks managed public land. Cal4Wheel members and supporters have concrete, definite, and immediate plans to continue such activities at HVSVRA throughout the future.

GENERAL COMMENTS

We recognize the positive health and social benefits that can be achieved through outdoor recreation. We also recognize that motorized recreation provides business owners and local communities with significant financial stimulus. Of great importance to the impetus for this comment letter: our members are directly affected by management decisions concerning public land use in CA State Parks managed public lands, including and especially, decisions that impact the scope of public access for outdoor recreation.

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Our members subscribe to the tenets of:

- Public access to public lands now, and for all future generations
- Active stewardship to maintain conservation of public lands, and safety for those who enjoy them
- Conservation of ecological, cultural, and archeological resources in balance with implementation of the Congressional (federal) and Public Resource Code (state) mandates for multiple-use public land management
- Sharing our natural heritage

Cal4Wheel members as well as the general public desire access to public lands now and in the infinite foreseeable future. Restricting access today deprives our children of the opportunity to enjoy the many natural wonders of public lands. Cal4Wheel members and the general public are deeply concerned about the condition of the environment and public safety. They desire safe means to access public lands to engage in conservation efforts as well as outdoor recreation. The public desires to share our natural heritage now and in the future. How can our children learn about and appreciate our natural heritage when access to public lands is eliminated or restricted due to CA State Parks management activity when landscapes are allowed to deteriorate due to lack of proper maintenance, and when public lands are made exclusively available to a limited sector of the general public based on the imposition of management decisions that override and eradicate effective implementation of balanced public enjoyment and recreation with preservation of natural and cultural resources?

Cal4Wheel supports the concept of managed recreation and believes it is prudent to identify areas where off-highway vehicle (OHV) use is appropriate. Recreation, especially recreation off of paved or gravel roads, is the leading cause of growth in visitors to public lands[2]. This is a longstanding trend, and it is critical to note, California has led the nation as the state with the highest percentage of population and number of participants in OHV recreation since 2008. The US OHV market is worth more than $10 billion, and California represents over 10% of that market share. It is clear that public interest in OHV recreation is a dominant value and preferred mode of outdoor recreation for residents across the USA, and especially, in California.

CA State Parks manages 1.59 million acres of public land in California[3], encompassing 280 state parks. Within the state park system, only 9 of those 280 parks are State Vehicular Recreation Areas (SVRAs) that are dedicated to motorized recreation. The 9 SVRAs comprise 141,740 acres, which is less than 9% of the state park system. Outside of state parks, there are 48 million acres of federally managed public land in California. More than 50% of those 48 million acres are 100% closed to OHV access through designation as Wilderness, Wilderness Study Areas, Roadless Consen/ation Areas, Areas of Critical Environmental Concern, National Consen/ation Areas, Wildlife Refuges, and similar categories of environmentally-dominant classification. Within the remaining 50% of federally-managed public lands, the vast majority of OHV access is restricted to a continually shrinking set of designated routes. **Across the state of California, the 9 SVRAs that comprise 141,740 acres represent a mere 0.2% of public lands that are designated for the purpose of OHV recreation.** These numbers are provided to demonstrate early in this discussion, that the volume of state park land that is available for OHV recreation is an exceptionally tiny fraction of California's state parks and public lands. Ironically, within the 9 SVRAs, there are additional restrictions to OHV access such that the full 141,740 acres is not truly open to motorized

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recreation, rather, only a fraction of it is. Thus, the remaining areas within the 9 SVRAs that are open for OHV access are truly precious to OHV enthusiasts and the OHV industry.

California's public lands offer the primary source for the public to enjoy outdoor recreation. Reduction or elimination of public access to CA State Parks managed land thus bears the potential to increase user conflicts and resource damage by removing sufficient recreation access to public lands for all forms of recreation, including OHV. Additionally, degradation of the natural and cultural values of CA State Parks managed public lands diminishes the quality of the outdoor experience for our members, as well as the general public.

The DEIR provides some evidence of guidelines and active management that may functionally serve to protect OHV recreation and public access within HVSVRA. While protection of natural and cultural resources is clearly articulated, the need balance conservation efforts with the recreation values of HVSVRA is neither explicitly nor implicitly demonstrated. It is critical that the DEIR must explicitly define that OHV recreation and public access are the centric purpose of SVRA operations. There are elements within the DEIR that must be clarified and strengthened to ensure a balanced management approach that will uphold the quality of both recreational values and natural resources for perpetuity. It is critical that the DEIR / General Plan should treat OHV routes, open riding areas, or OHV infrastructure as designated protected infrastructure with an overriding priority to other values and uses of the SVRA. Within the DEIR, however, resource protection measures and adaptive management are given equal or sometimes higher operational priority where impacts are identified.

Cal4Wheel has reviewed the DEIR and urges CA State Parks to implement several revisions to strengthen the position of OHV recreation and public access as the centric purpose of SVRA operations, while accomplishing the goals inherent to statutory requirements for resource management within a SVRA. The recommendations we offer are rooted in the fact that CA State Parks is legally and procedurally compelled to resolve each issue in the DEIR / General Plan. Our recommendations for remedy address the following:

1. Public Resource Code and CA State Parks operational guidelines
2. HVSVRA improvements vs. risks of negative impacts to OHV access
3. Discrimination of members of the public with disabilities
4. False assertion of government ownership of federally-managed public lands

In summary reference to the items noted above, with additional detail for each following within this comment letter, we support any additional comments from individuals, groups, associations, and the general public that encourage CA State Parks to uphold their mission and commitment to the public to manage public lands in California in a manner that maximizes public access and recreation alongside the objective to sustain the health, diversity, and ecological values of HVSVRA for the use and enjoyment of present and future generations. We strongly advocate against any components of the DEIR that would diminish or eliminate OHV recreation and public access to HVSVRA now or in the future, and/or diminish the quality of the outdoor recreation experience for our Cal4Wheel membership and the general public.

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PUBLIC RESOURCE CODE AND CA STATE PARKS OPERATIONAL GUIDELINES

California State Parks operate under a set of mandates found in the California Public Resources Code (PRC). The PRC establishes that state parks are to be managed for public enjoyment, recreation, and preservation of natural and cultural resources. For instance:

- *PRC §5001.65 states that the primary purpose of state parks is for the "preservation of the scenic, historic, and scientific values" and for public recreational opportunities in a manner consistent with the protection of those values."*
- *PRC §5019.53 provides that "state park units should be managed primarily for the protection of natural and cultural resources, while accommodating outdoor recreation to the extent that it does not impair those values".*

Therefore, while California state parks support a variety of recreational uses, their guiding principle is not the multiple-use model but instead the protection and conservation of natural and cultural resources alongside public access. The management focus is on balancing recreational use with conservation objectives.

However, the mission of California State Parks in managing SVRAs is focused on maximizing public access specifically for motorized recreation. It emphasizes balanced use, where motorized recreation is encouraged within a framework of resource protection and safety. According to the PRC and the guidelines governing the Off-Highway Motor Vehicle Recreation (OHMVR) program:

- *PRC §5090.02 states that the purpose of SVRAs is to provide high-quality recreational opportunities for off-highway vehicle (OHV) enthusiasts while also protecting California's natural and cultural resources. The code specifically mentions that the program should provide "sustainable, environmentally responsible" recreation.*
- *PRC §5090.35 directs the OHMVR Division to balance motorized recreation with conservation, restoration, and management of lands to protect sensitive habitats, wildlife, and cultural resources within SVRAs.*

The mission of the OHMVR program and SVRAs thus centers on responsible recreation, ensuring that motorized recreation does not come at the cost of environmental degradation or resource destruction. Likewise, at SVRAs, environmental and resource preservation should not come at the cost of motorized recreation.

It is thus imperative for the HVSVRA General Plan Update and DEIR be revised to explicitly recognize OHV routes, distributed riding polygons, staging areas, campgrounds, and associated OHV-specific facilities as **protected park infrastructure** and to state unequivocally that the Park's management and General Plan shall prioritize providing sustained, high-quality off-highway vehicle recreation consistent with the statutory purpose of State Vehicular Recreation Areas. The revisions recommended below are necessary to:

1. Establish the Park's primary purpose and implementation priorities legally certain

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2. Ensure that resource-protection measures - while important - do not operate without a clear hierarchy and replacement/mitigation obligation that results in no net loss of OHV opportunity
3. Provide transparent, measurable monitoring –> response –> restoration protocols where closures or restrictions are considered. (See legal authorities and policy recommendations below.)

Statutory and policy foundation for treating OHV recreation and OHV infrastructure as primary, protected mission of SVRAs

State law establishes SVRAs as sites selected, developed, and operated to provide off-highway vehicle recreation opportunities. PRC expressly provides that "State vehicular recreation areas consist of areas selected, developed, and operated to provide off-highway vehicle recreation opportunities" and further requires the OHMVR Division to plan, manage, maintain, and restore lands in SVRAs consistent with that purpose. The code therefore supplies a statutory mandate to prioritize OHV recreation as the principal mission of SVRAs.

The PRC requires State Parks to prepare General Plans before permanent commitment of park resources and gives the General Plan the role of defining a unit's primary purpose and management. PRC §5002.2 and State Parks' planning guidance make clear that a General Plan is the key policy document used to declare the purpose and management direction of a unit - in this case, Hungry Valley SVRA - and therefore should explicitly articulate primary use priorities and implementation standards. (PRC §5002.2; California State Parks Planning Handbook.)

The Off-Highway Motor Vehicle Recreation Act and implementing statutes (PRC §§5090.01 et seq.) establish a statutory framework for OHV management, including the OHMVR Division's duties to inventory wildlife and plant communities, prepare Wildlife Habitat Protection Plans (WHPPs), and implement monitoring and soil conservation standards - but critically these duties are codified within the same statutory framework that defines SVRAs' purpose to provide OHV recreation. The statute contemplates striking a balance between recreation and resource protection, but the statutory placement of SVRA purpose language supports an interpretation that OHV use is a core, primary purpose requiring explicit recognition and protection in park planning documents.

How the DEIR / Preliminary General Plan currently treats OHV infrastructure and why that is insufficient

The Notice of Availability (NOA) and Project Description affirm that "the purpose of Hungry Valley SVRA is to provide a destination for OHV recreation use" while also noting the plan's many resource protection measures; however, the current Preliminary General Plan and DEIR stop short of declaring OHV routes and facilities to be **protected park infrastructure** with explicit closure/replacement/restoration sequencing and funding commitments required prior to any permanent loss of OHV capacity. The DEIR's NOA confirms the Park's OHV purpose but does not translate that purpose into a binding, prioritized management hierarchy or into specific mitigation sequencing to avoid net loss of OHV opportunity.

The DEIR/Plan presently contains multiple resource-protection mechanisms (Trails-Only zones, preserves, WHPP-driven monitoring and adaptive management) that, as written, give the agency authority to restrict or close OHV areas based on monitoring outcomes without requiring pre-defined

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replacement riding capacity, defined timelines for restoration, or immediate funding to restore OHV infrastructure. While habitat protection is a valid and important objective, the absence of an explicit hierarchy that protects OHV infrastructure as the primary mission (or at minimum guarantees immediate equivalent replacement) creates a realistic risk of permanent or long-term net loss of OHV opportunity. For example, the WHPP mandates closure of non-compliant portions until standards are met but provides no concrete reopening timeline or guarantee of replacement OHV capacity in the plan text as currently drafted.

Legal and administrative authorities supporting the requested changes

A. Statutes and departmental policy

- PRC §5090.43: SVRAs "consist of areas selected, developed, and operated to provide off-highway vehicle recreation opportunities." This statutory language supports a General Plan that explicitly recognizes OHV infrastructure as a primary park asset and protects that asset from avoidable permanent loss.
- PRC §5090.35 & §5090.32: direct the OHMVR Division to inventory native plant communities, prepare a Wildlife Habitat Protection Plan, and manage lands in SVRAs - obligations that must be harmonized with the primary SVRA mission and that, under a proper General Plan, should not be interpreted to permit irreversible displacement of OHV capacity without an explicit, publicly-defined mitigation/offset requirement.
- PRC §5002.2: requires a General Plan prior to permanent commitment of park resources; the General Plan must therefore specify priorities for use and protective measures in a way that resolves likely conflicts in advance. The law compels State Parks to use a General Plan to provide clarity on these tradeoffs.
- California State Parks' Planning Handbook and internal OHMVR guidance: both documents explain that the General Plan should establish the unit's primary purpose and implementation tools; they provide administrative authority and best practices for including explicit operational standards, monitoring regimes, and funding/maintenance commitments in the General Plan.

B. Relevant administrative and judicial precedent

- Litigation over SVRA and SVRA-adjacent management decisions demonstrates courts will scrutinize agency action that alters long-standing OHV uses (as we have experienced in the series of litigated matters impacting Oceano Dunes SVRA). Recent appellate decisions have recognized the legality of OHV recreation under coastal and land-use constraints where statutes, local plans, and permits allow OHV use, and have limited attempts by other agencies to unilaterally eliminate OHV uses absent proper statutory authority and process. Those cases underscore the importance of having a clear, plan-level articulation of the Park's OHV purpose and protections to reduce litigation risk and to ensure agency decisions fit within the statutory framework.

  While the cases cited above are fact-specific and do not establish an absolute legal right to operate OHV uses in any manner whatsoever. However, they illustrate that a clear plan-level statement of purpose and hierarchy strengthens the legal defensibility of OHV operations and

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guides how resource protection measures can be lawfully implemented without unintended displacement of OHV infrastructure.

Requested specific revisions to the General Plan and DEIR

Inserted text below accomplishes three statutory and policy objectives simultaneously:

1. Aligns the General Plan with PRC SVRA purpose language (PRC §5090.43) and the General Plan mandate (PRC §5002.2)
2. Protects OHV infrastructure by requiring the agency to demonstrate that no less-restrictive alternative exists prior to permanent closure
3. Establishes measurable monitoring -> response -» restoration protocols so closures triggered by resource monitoring are pre-conditioned on funding, replacement capacity, published thresholds, and a reopening plan

I. New general-purpose policy - "Primary Purpose & Protection of OHV Infrastructure" (insert in General Plan Purpose/Goals section)

Model policy language:

Policy GP-OHV-1: Primary Purpose — OHV Recreation and Infrastructure Protection.

Hungry Valley SVRA shall be managed primarily to provide high-quality off-highway vehicle (OHV) recreation tor the public. OHV routes, distributed riding areas, staging areas, trailheads, campgrounds, and associated OHV facilities are designated as ***Critical Park Infrastructure*** *and shall be recognized, maintained, and protected as primary park resources. Any proposal to permanently restrict, convert, or close Critical Park Infrastructure shall require demonstration by the Department that:*

1. *No reasonable, less-restrictive alternative exists that would allow continued OH V access:*
2. *All practicable avoidance and mitigation measures have been implemented and documented: and,*
3. *A funded replacement plan is in place that provides equivalent or greater OHV capacity (trail miles and staging/camping capacity), and a restoration schedule with specific reopening timelines and measurable restoration criteria.*

Temporary restrictions for short-term resource protection are permitted only pursuant to the Monitoring & Response Protocol (see Policy MM-OHV-MONITOR below) and shall be accompanied by Immediate measures to provide alternative riding opportunities or mitigation offsets.

(To be added to Chapter [Purpose & Goals] of the General Plan and inserted as an overarching objective in the Recreation and Implementation chapters.)

Rationale and DEIR sections to amend: Add this policy to the Purpose/Goals chapter (DEIR Chapter 2 / Project Description) and to the Recreation/Implementation chapters. The DEIR's Project Description and

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NOA recognize OHV recreation as the SVRAs purpose but do not create this protective hierarchy; inserting GP-OHV-1 will ensure the Plan's purpose is operationalized.

II. New designation & implementation detail — "Critical Park Infrastructure" (add to Land Use and Implementation sections)

Model policy language:

Policy IM-OHV-1: Critical Park Infrastructure Designation & Restoration Guarantee.

All existing OHV trails, distributed riding polygons, staging areas, developed campgrounds, and primary access roads within Hungry Valley SVRA are designated "Critical Park Infrastructure." Prior to any permanent conversion, closure, or substantial restriction of Critical Park Infrastructure, the Department shall:

- *Prepare and publish a trade-off analysis demonstrating that closure is necessary and that no feasible less-restrictive alternative exists;*
- *Identify and commit funding sources sufficient to implement restoration, replacement, and mitigation measures;*
- *Publish a restoration schedule with specific numerical targets and a maximum timeline for reopening (e.g., restoration to passable trail grade and reopening within 90-180 days after meeting restoration targets, unless the Department makes a documented finding of an extraordinary natural resource emergency); and,*
- *Provide immediate alternative riding opportunities equal to pre-closure capacity*

Temporary closures shall be implemented according to the Monitoring & Response Protocol (Policy MM-OHV-MONITOR) and shall use the least restrictive measures feasible prior to area-wide closure.

(Add to Implementation / Funding & Operations sections and the CEQA mitigation table as MM-OHV-1.)

Rationale and DEIR sections to amend: Insert as an Implementation policy and add MM-OHV-1 to the DEIR mitigation/commitments table in every resource chapter where closures are analyzed (Biological Resources, Cultural Resources, Air Quality, Recreation). This directly addresses the DEIR gap where WHPP closures are called for without explicit restoration timeline, funding guarantee, or required replacement capacity.

III. Operational monitoring & response protocol - "Monitoring & Response Protocol (MRP)" (add to **Monitoring / Adaptive Management /WHPP sections and as a CEQA mitigation)**

Model policy language:

Policy MM-OHV-MONITOR: Operational OHV Monitoring & Response Protocol.

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The Department shall adopt and Implement an Operational OHV Monitoring & Response Protocol (MRP) for Hungry Valley SVRA, published and budgeted annually that includes the following elements:

1. ***Monitoring metrics and frequency.*** *Monthly peak-season monitoring of: (a) trail and distributed riding erosion metrics: (b) particulate matter (PM10/PM2.5) at designated receptor locations and staging nodes: (c) vegetation loss and off-trail impacts at prioritized polygons: (d) cultural resource disturbance indicators.*
2. ***Numeric thresholds.*** *Pre-published numeric thresholds tied to specific management responses (example ladder):*
    a. ***Level 1 (operational control):*** *PM10 > [X pg/m3] at receptor A for 2 consecutive monitoring events –> apply speed limits, enhanced signage, targeted education, and targeted water suppression at staging nodes;*
    b. ***Level 2 (localized intervention):*** *PM10 > [Y pg/m3] or erosion score above threshold at identified segment implement temporary reroutes, seasonal restrictions for <30 days;*
    c. ***Level 3 (area closure):*** *continued exceedance after Level 2 measures for Z days or confirmed severe cultural/habitat harm –* temporary area closure with a documented restoration schedule and funding.*
3. ***Reopening criteria and timelines.*** *For closures invoked under Level 2 or 3, the MRP shall identify explicit reopening criteria (e.g., 7 consecutive days of PM measurements below Level 1 thresholds; restoration of trail structural standards). All closures shall include a published maximum timeline for reopening absent documented emergency conditions (for example, default reopening within 90 days after restoration targets are met).*
4. ***Public reporting and stakeholder oversight.*** *Annual MRP monitoring reports, immediate public notification of Level 2/3 responses, and an OHV User Advisory Panel that reviews closures and restoration plans.*

(Add to WHPP, Monitoring, and CEQA mitigation tables as MM-OHV-MONITOR / MM-AQ-OP-1.)

Rationale and DEIR sections to amend: Insert into the WHPP (Appendix) and the Air Quality, Recreation, and Biological Resources mitigation sections. Given that the DEIR currently identifies significant/unavoidable operational air quality impacts, adoption of MM-OHV-MONITOR will not magically eliminate all impacts but will provide a transparent, measurable ladder whereby closures are minimized, least-restrictive actions are taken first, and reopening is predictable and funded. This addresses the DEIR gap identified in the DEIR's Air Quality and WHPP discussion that lacks transparent reopening criteria tied to monitoring.

IV. CEQA mitigation insert (to be added to mitigation tables in DEIR)

Model mitigation text (add under each affected resource chapter):

MM-OHV-1: OHV Infrastructure Protection & Restoration Guarantee. *Prior to adoption of the General Plan, the Department shall commit and make enforceable, through the General Plan Implementation Program ora binding funding mechanism, dedicated funds sufficient to finance restoration, replacement, and monitoring obligations triggered by temporary or permanent closure of*

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any Critical Park Infrastructure. The department shall not permanently convert or close Critical Park Infrastructure until an equivalent OHV riding capacity replacement is secured and funded. Temporary closures for resource protection shall be implemented according to MM-OHV-MONITOR and accompanied by an immediate plan for replacement riding capacity or other mitigation alternatives.

(Add to CEQA mitigation table as enforceable MM.)

Rationale and DEIR sections to amend: Add to Air Quality, Biological Resources, Cultural Resources, and Recreation mitigation tables where closures/mitigations are described. This establishes a binding mitigation that otherwise is not clearly present in the DEIR.
Practical implementation demands (operations & funding):

1. **Require mapping:** publish and append to the General Plan a complete, GIS-ready layer named "Critical Park Infrastructure" showing all trails, distributed riding polygons, staging, and campgrounds. Any proposed change must be accompanied by the Trade-off Analysis required by IM-OHV-1. (DEIR Project Description & Land Use Figures; Preliminary General Plan figures.)
2. **Funding:** create an OHV Infrastructure Fund as part of the General Plan Implementation Program, funded through a combination of SVRAentrance/camping fees, and appropriations, with a dedicated reserve to finance required restoration and replacement actions triggered by closures. Require the Department to identify initial funding prior to Plan adoption. (Implementation & Funding sections.)
3. **Stakeholder oversight:** establish an OHV User Advisory Panel with standing ability to review and recommend closure/reopening plans, monitoring reports, and restoration schedules. (Monitoring/Adaptive Management sections.)

How these changes square with the statutory WHPP obligations and resource protection duties:

The WHPP, monitoring, and soil conservation duties required by PRC §5090.35 are important and must be implemented; however, those duties should be operationalized in a manner that preserves the SVRAs statutory purpose. The policies and mitigation language above do not eliminate the WHPP's role; rather, they require that WHPP-driven actions that would reduce OHV capacity follow a defined, least-restrictive sequence, include funded restoration/replacement, and be administered under a transparent Monitoring & Response Protocol that protects recreation values while addressing resource concerns. This approach is consistent with the statutory framework that contemplates both OHV recreation and resource protection in tandem rather than permitting unbounded closure without replacement or clear reopening metrics.

While the DEIR / General Plan champions OHV recreation by articulating OHV access within its mission... implementing the measures above would establish tangible and explicit protections, ensuring recreational access remains intact and resilient amid environmental changes, staff turnover, and other social, political, or external influences that may impact HVSVRA in the future.

Since its inception in 1959, Cal4Wheel has been an active, responsible partner of CA State Parks, with members continually engaged in volunteer service to advance conservation, trail and landscape maintenance, public education, public safety, and cooperative public land management. Cal4Wheel clubs have a longstanding history, extending for more than six decades, of visiting CA State Parks managed

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lands as individuals, clubs, and for organized outdoor recreation events. Casual use and organized events like ours bring public land visitors to CA State Parks managed lands in an orderly and controlled manner. This ensures conservation of the landscape and wildlife habitat, while preventing overcrowding and user conflict. Our events promote land use ethics, responsible camping, respect for natural resources, and public safety. It is important that implementation of the HVSVRA General Plan update will not obstruct the membership of Cal4Wheel, as well as members of the general public, from accessing HVSVRA for organized, safe, conservation-centric recreation by eliminating or restricting access to established OHV routes and riding areas.

It is important for CA State Parks to bear in mind that the agency does not own our public lands. CA State Parks managed lands are a part of the public endowment, as all public lands are owned by the citizens of the USA (the public); CA State Parks is merely contracted to manage those lands within the defined scope of limited authority that is granted by PRC. It is important that the DEIR / Plan does not overstep PRC intent such that the best interests and needs of the public are being overrun through restriction or elimination of public access to CA State Parks managed lands through unnecessary, arbitrary, and capricious restriction of designated OHV routes and riding areas. To do so would constitute a violation of the rights and legal protections of the American people through unjustified application of legislatively-directed public land management authority.

To remedy gaps within the DEIR wherein protection of OHV recreation may be compromised as a core, preeminent value of HVSVRA, we urge CA State Parks to explicitly state within the DEIR that existing designated OHV routes, riding areas, campgrounds, and other recreation infrastructure are of equal value to the natural resources that are cited for protection in the DEIR. Additionally, we recommend that all existing recreational infrastructure be categorized as <u>protected infrastructure</u>, not to be restricted, minimized, closed to access, degraded in functional value, or destroyed as a result of General Plan implementation, nor subsidiary Plans (WHPP, SCP, etc.) that extend from General Plan directives for HVSVRA operations.

<u>HVSVRA IMPROVEMENTS VS. RISKS OF NEGATIVE IMPACTS TO OHV ACCESS</u>

The Draft General Plan Update and DEIR acknowledge both (a) continued investment in OHV facilities and new trail connections (notably in the Condor Mesa area), and (b) robust resource-protection measures (Trails-Only designations, presen/es, WHPP / monitoring and adaptive management) and a finding that **operational fugitive dust impacts from OHV activity are significant and unavoidable.**

Taken together, these elements create a realistic risk pathway by which current conditions (existing dust/erosion problems, resource sensitivities, cultural-resource vulnerability, funding constraints) combined with forecasted conditions (increased visitation from improved amenities, climate-driven drought and wildfire risk, potential regulatory pressure on PM emissions) will lead to **more frequent, larger, or longer temporary and permanent restrictions or closures** of distributed riding areas and OHV routes unless the Final EIR and adopted General Plan explicitly adopt mitigation/management measures designed to minimize closures and ensure rapid, funded restoration and alternative access when restrictions are needed.

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Where the DEIR / General Plan proposes expanded OHV access or improvements that should be retained

1. Condor Mesa trails and campground (expansion of trail miles and new RV campground): the Preferred Alternative formalizes trail connections and proposes new trails in the Condor Mesa Area and a new RV campground/entrance (Condor Mesa / access A3), which are explicit expansions of OHV trail infrastructure and visitor amenities. These expansions increase the supply of organized trail riding and staging capacity and should be carried forward in the Final EIR as components that can help absorb visitation and reduce pressure on remaining distributed riding polygons if appropriately managed.
2. Improved trail connectivity to surrounding National Forest lands: the Plan indicates formalization of connections (e.g., Stipa Trail, Sterling Canyon to East Frazier and Tejon Trails, Road Runner connection), which improves route redundancy and dispersal of riders, potentially reducing concentrated degradation in single polygons. The Final EIR should retain and prioritize these connections.
3. New/improved staging, campgrounds, and access points: the Preliminary General Plan and figures identify additional staging and camping capacity intended to concentrate use in managed nodes; retaining these improvements (and ensuring they are well sited and funded) is a key strategy to reduce dispersed impacts that drive closures.

Risks of closure or restricted access: current conditions and forecasted developments that create the risk pathway

1 **DEIR finds operational fugitive-dust impacts significant & unavoidable:** the DEIR explicitly concludes that operational PM (fugitive dust) from OHV recreation is a significant, unmitigable impact at the program level. That finding alone creates a foreseeable regulatory and management risk: where monitoring or complaints show PM exceedances or public-health concerns, agencies and regulators commonly respond with restrictions, reduced allowable activity, or closures to protect air quality or public health. The DEIR's significant/unavoidable finding therefore is a proximate cause for future restrictions unless explicitly managed.

2 **Adaptive management and WHPP create authority to close or restrict:** the General Plan / DEIR and the WHPP embed monitoring, adaptive management, and closure as management tools (temporary/rotating closures, rerouting, buffers) to protect habitat and cultural resources. While these are necessary conservation tools, they provide the procedural authority that CA State Parks may use to limit OHV access; absent explicit constraints, replacement requirements, time limits, or funding commitments, closures can remain in place long term. In short: the Plan's resource protection framework both enables and lacks guardrails against extended displacement of OHV use.

3 **Increased visitation and capacity improvements concentrate risk:** new trail miles, staging improvements, and a Condor Mesa campground are likely to increase overall visitation and to concentrate use near nodes. Coupled with the DEIR's finding that distributed-riding acreage is being reconfigured (Trails-Only designations in sensitive areas), increased visitation in a smaller or more constrained distributed footprint will elevate erosion and fugitive dust generation at remaining open areas and thereby increase likelihood of monitoring-triggered restrictions.

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4 **Climate-driven wildfire, drought, and storm events increase fragility:** forecasted conditions (hotter, drier summers; more severe wildfire seasons; episodic storms) increase the frequency and scale of land remediation, hazard-reduction projects, and closures for safety and rehabilitation (post-fire stabilization). Such closures are often longer and more disruptive than planned short-term restoration closures. These realities raise the probability that access will be curtailed for extended periods unless restoration/equipment/funding is pre-positioned. (General plan context; see DEIR hazard/wildfire sections and project descriptions).

5. **Cultural resource discoveries and legal obligations can stop or reroute use:** the Plan's cultural resource protections (preserves, avoidance, surveys) are required by law; inadvertent discovery during operations or projects can trigger rapid restrictions (avoidance buffers, reroutes) and consultations that pause OHV access pending mitigation. Without an explicit replacement/restoration requirement, such protections can result in durable loss of OHV capacity.

6 **Air quality regulatory pressure (district rules, PM standards):** local air districts (e g , VCAPCD and others) have dust control programs and may condition approvals or require fugitive PM management plans (e.g., Dust Control Plans, Fugitive PM10 Management Plans) that could require restrictions on operations or stabilized surfaces; the DEIR's identification of significant operational PM makes such regulatory interventions more likely.

7. **Funding shortfalls and deferred maintenance:** General Plan and DEIR commitments are only effective if funded. If the Department lacks dedicated funding for monitoring, restoration, or alternate-trail construction, temporary closures can become effectively permanent due to resource constraints. The DEIR/Implementation chapter should therefore be required to identify committed funding sources or an OHV infrastructure reserve.

Recommendations: practical, implementable strategies to reduce the likelihood of closures or long-term restrictions and to maintain OHV access

The DEIR and General Plan must move beyond finding problems and authorizing closures; they must require **(1)** proactive operational controls that reduce the rate at which resources degrade, **(2)** binding monitoring –> response –> restoration protocols with explicit thresholds and timelines, (3) funding and replacement guarantees that prevent temporary closures from becoming permanent losses, and **(4)** physical investments that increase managed capacity (retained Condor Mesa trails and campground, connections) to diffuse rider pressure. Therefore our recommendations include:

A. Retain and prioritize expanded OHV access components (Condor Mesa + connectivity).
   1. Retain Condor Mesa trail development and RV campground in the Final EIR and make those components implementation priorities - Condor Mesa increases managed trail miles and camping capacity, which can draw concentrated use away from sensitive distributed polygons. The Final EIR should commit to building Condor Mesa and the listed trail connections as implementation priorities to proactively alleviate pressure elsewhere in the SVRA.
   2. Prioritize trail connections to Los Padres NF and formalize cross-boundary connectivity agreements - the Final Plan should preserve and implement the formalized trail connections (Stipa, Sterling Canyon-East Frazier-Tejon, Road Runner) given that dispersed connectivity reduces repetitive use concentration.

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Where needed, pursue MOUs with USFS to provide alternative capacity in high-demand periods.

B. Implement a transparent Operational Monitoring & Response Protocol (MRP) with numeric thresholds and a defined response ladder (draft language provided). Require as an enforceable Plan element (and CEQA mitigation) a site-specific MRP that includes at minimum:

1. Monitoring network & schedule
    a. Monthly (peak season) monitoring of: trail erosion indices, off-trail disturbance, and vegetation loss.
2. Numeric thresholds and a defined, escalator/ response ladder (example ladder)
    - **Level 1 - Operational controls:** when monitoring indicates mild exceedances (e.g., PM10 > X pg/m3 for 1 day or erosion index threshold breached for a single segment), implement speed limits, enhanced signage, targeted education/outreach, and deploy portable water suppression at staging nodes.
    - **Level 2 - Localized interventions:** if exceedances persist (e.g., PM10 > Y pg/m3 for 2 monitoring events or erosion index exceeds Level 2), implement temporary reroutes, seasonal restrictions limited to <30 days per season, and short segment closures combined with accelerated restoration work.
    - **Level 3 - Area closure with restoration guarantee:** only if Levels 1-2 fail for a defined duration (e.g., continued exceedance after 21 days) or if there is severe, documented habitat/cultural harm, allow temporary area closure but require a funded restoration plan, maximum closure timelines (e.g., reopen within 90 days after restoration criteria are met), and immediate alternative riding access.
    - Make numeric thresholds explicit in the Final Plan. The Final EIR should adopt an MRP mitigation (MM-AQ-OP-1 / MM-OHV-MONITOR) that binds these procedures.
3. Reopening criteria and maximum closure timelines
    a. For any closure imposed under management actions, require measurable reopening criteria (e.g., PM < Level 1 threshold for 7 consecutive days; erosion rating returned to passable standards; cultural resource mitigation actions completed). Limit closures absent declared emergency (e.g., wildfire) to fixed, pre-published maxima (e.g., 90 days) unless an extraordinary finding is made and publicly justified. The Final EIR should make these timelines binding to prevent indefinite loss of access.
4. Public reporting and oversight
    a. Publish monitoring data and responses online monthly and require an annual report that documents how often Levels 1-3 were invoked, the outcomes, and budgets used. Create an OHV User Advisory Panel to review closure decisions and restoration plans to ensure transparency and timely reopening.

C. Adopt a Least-Restrictive Sequence & Offset/Replacement Requirement before any permanent conversion

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1. Sequence: mandate that the Department exhaust operational controls first (speed limits, education, focused stabilization), then localized reroutes and temporary restoration; permanent area closures or conversion to Trails-Only or preserve status must be a last resort and require a documented trade-off analysis and public notice. Embed this sequence as enforceable policy/mitigation.
2. Replacement/offset requirement: before any permanent loss of distributed riding acreage or trail miles, require the Department to provide equal or greater OHV capacity (trail miles/staging/campground spaces) on-site or via a guaranteed off-site alternative within X miles. Include binding commitments to construct the replacement capacity and identify funding sources before the conversion is finalized. This prevents permanent net loss of opportunity.

D. Strengthen dust control & stabilization measures where they are feasible (targeted, not park-wide watering - although the DEIR finds full park-wide operational dust elimination infeasible, targeted, pragmatic dust controls can cut down the frequency of closures.)
   1. Targeted stabilization at high-use staging nodes and parking lots - pave or apply durable stabilization (rock surfacing, engineered stabilization mats, or stabilized surfaces) at staging areas, high-traffic parking, and campground aprons to reduce particle entrainment at the sources most responsible for fugitive dust emission. Coordinate with the local air district's Fugitive PM management plan options where appropriate.
   2. Strategic use of reclaimed water / portable suppression for short-term events - while continuous watering across the park is infeasible, targeted watering during high-use weekends at staging nodes or during ephemeral events can reduce acute PM spikes; these actions should be part of the Level 1 toolkit in the MRP.
   3. Vegetative buffers and surface treatments on sensitive polygons adjacent to staging nodes - where feasible, apply rapid stabilization/planting (seed and tackifier, hydroseeding).

E. Create an OHV Infrastructure Fund and require committed funding for monitoring and restoration
   1. Dedicated fund - create a General Plan Implementation requirement that a dedicated OHV Infrastructure Fund be capitalized (using campsite / entrance / staging fees, grants, and appropriations) and that the Fund hold a minimum reserve to finance restoration and to implement the MRP responses including rapid construction of alternative capacity. Link MM-OHV-1 in the DEIR to that funding commitment as an enforceable mitigation. This prevents closures from turning into permanent losses due to lack of funds.
   2. Funding triggers - require that the Fund provide funds for restoration BEFORE a closure is implemented (or concurrently) so that restoration work can begin immediately, shortening closure duration.

F. Institutional tools: mapping, mapping protection layer, and stakeholder oversight
   1. Map and label a "Critical OHV Infrastructure" GIS layer in the General Plan appendices (trails, distributed polygons, staging, campgrounds). Require that any

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change to that layer follow the IM-OHV sequence, trade-off analyses, replacement/offset, and funding commitments. This makes asset protection explicit and reduces administrative drift.

2. Establish an OHV User Advisory Panel with formal review rights on closure/reopening plans and monitoring reports. This provides user buy-in and faster conflict resolution.

Why these measures are needed and how the retained expansion elements help avoid closures

Retaining Condor Mesa and formalized trail connections is part of the solution: new, managed trail miles and staged camping capacity help channel riders into stable, maintainable corridors and away from sensitive dispersed polygons that drive closures. Thus, the DEIR should retain these components and accelerate their implementation, coupled with an MRP that ties monitoring to least-restrictive responses.

The DEIR's significant/unavoidable finding for operational PM means the plan - as currently drafted - faces a credible pathway to future restrictions unless the Final EIR converts monitoring findings into a predictable, funded, and least-restrictive program that emphasizes rapid restoration and replacement capacity when closures occur. The recommendations above narrow that pathway and make closures rarer and shorter.

To reduce the real and growing risk of closures and long-term restrictions to OHV routes and open riding areas at HVSVRA, we urge CA State Parks to incorporate the following into the Final EIR and General Plan:

A. **Retain and prioritize construction of Condor Mesa trails and campground and the other new trail connections identified in the Preferred Alternative**
B. **Adopt and make enforceable an Operational Monitoring & Response Protocol (MM-OHV-MONITOR) with numeric thresholds, a clear response ladder, reopening criteria, and maximum closure timelines**
C. **Adopt an Infrastructure Protection & Restoration Guarantee mitigation (MM-OHV-INFRA) that requires funded replacement/offset before permanent closures**
D. **Create an OHV Infrastructure Fund to finance timely restoration and replacements**
E. **Require public reporting and an OHV User Advisory Panel to oversee closures and reopenings**

These measures will materially reduce the odds that resource protection or air-quality interventions become permanent net losses of riding opportunity and will presen/e the HVSVRA's role as a durable destination for OHV recreation while responsibly managing natural and cultural resources.

DISCRIMINATION OF MEMBERS OF THE PUBLIC WITH DISABILITIES

California has enacted several laws to ensure social and economic justice for individuals with disabilities, focusing on equitable access to public spaces, including public lands. Current enforceable laws include:

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- **California Public Resources Code § 5070 et seq :** This code focuses on ensuring accessibility within state parks and recreational areas. It requires that state parks develop and implement accessibility guidelines to facilitate the use of public lands by individuals with disabilities.
- **California Public Resources Code § 1001:** this section of CA PRC acknowledges barriers that prevent Californians, including those with disabilities, from accessing and enjoying the state's natural resources and outdoor spaces. It emphasizes the need for safe, reliable, and affordable routes, including accessible transportation and pathways, to public lands.

Motorized recreation creates meaningful access to the health and social benefits of outdoor recreation. Restrictions on motorized access creates a disproportionate and discriminator/ impact on Americans with disabilities. It is imperative that CA State Parks consider the balance of needs of disabled persons to enjoy OHV recreation at HVSVRA- a legislatively designated motorized recreation area - with other management priorities. Cal4Wheel's membership includes hundreds of individuals who are unable to access public lands without the use of off-road vehicles and OHV routes due to disability and age (age is not legally factored into the equation of disabilities, however, restricted access for disabled persons irrevocably and simultaneously institutes restricted access for the elderly, which is yet another category of the public that is impacted by discriminatory management practices that could emerge through implementation of the DEIR / General Plan if proper protections for OHV access are not embedded into the plan).

Current California law and PRC demonstrate California's commitment to social and economic justice for individuals with disabilities, ensuring their right to access and enjoy public spaces, including public lands, on an equal basis with others. **We assert again, the exigence that CA State Parks must modify the DEIR / Plan to omit any potential for extended or permanent closures and restrictions to existing open OHV routes and riding areas, camping, and other recreation infrastructure within HVSVRA in order to mitigate risk of litigation and remain compliant with existing law.**

FALSE ASSERTION OF GOVERNMENT OWNERSHIP OF FEDERALLY-MANAGED PUBLIC LANDS

As noted above, State Park lands in California are public lands, meaning they are owned by the citizens of the state as a collective. The California Department of Parks and Recreation (California State Parks) is the managing authority, but it does not "own" the land in a private sense. Rather, the department manages these lands on behalf of the public, ensuring they are protected, stewarded, and available for public use under the framework of state law.

The California PRC (Sections 5001-5077) defines the roles and responsibilities of the State Parks Department, emphasizing its duty to manage the parks for public benefit, preservation, and enjoyment. This aligns with the concept that state parks are public assets held in trust for current and future generations.

Additionally, state parks in California are classified under the broader concept of public trust lands, which means they are managed in the public interest, reflecting shared ownership by all citizens. By legal statute, the land belongs to the people of California, with the State Parks Department merely acting as the permitted land manager that happens to currently hold responsibility for facilitating operation of these legally endowed public lands that are owned wholly by the citizens of California.

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Thus, we are alarmed and dismayed that there are statements within DEIR that assert that the CA State Parks "owns" HVSVRA, which is in fact, merely managed by CA State Parks. Additional statements within the DEIR attribute ownership of public lands to the US Forest Service (USFS) and other federal agencies. In order to protect the vested rights and ownership that American citizens possess through the endowment of our treasured public lands, and to ensure accurate language that aligns with PRC and the US Constitution, each of these false statements within the DEIR must be corrected. Erroneous references to state or federal ownership of public lands are found in the following:

- Project Description (Section 2), Subsection 2.2.1 Location and Regional Context; Easements and Other Uses, page 2-10:
  - *"The South Entrance on Hungry Valley Road Is on land owned by USFS and DWR, while the entry kiosk is on State Parks' land"*
  - This must be corrected to state USFS- and DWR-managed public lands... and State Parks-managed public lands…"
- Project Description (Section 2), Subsection 2.2.1 Location and Regional Context; Easements and Other Uses, page 2-10:
  - *"A set of USFS parcels near the southwestern corner of the SVRA separate a parcel of land owned by State Parks from the rest of the SVRA."*
  - This must be corrected to state "…set of USFS-managed parcels... and …a parcel of public land managed by State Parks…"
- Approach to the Analysis (Section 3), Subsection 3.0.3 Environmental Analysis Format; Regulatory Framework, page 3.0-2:
  - *"Local regulations generally are not applicable to the Proposed Project because Hungry Valley SVRA is owned and operated by the State of California and therefore is not subject to compliance with policies or ordinances established by Los Angeles, Ventura, or Kern counties."*
  - This must be corrected to state Hungry Valley SVRA is public land that is managed by the State of California…"
- Approach to the Analysis (Section 3), Subsection 3.4.2 Regulatory Framework; Public Resource Code, PRC Section 5097, page 3.4-10:
  - *"As used in this section, "public lands" means lands owned by or under the jurisdiction of the state or any city county district, authority or public corporation or any agency thereof."*
  - This must be corrected to state "... "public lands" means lands **owned by the collective citizens of the United States and managed under the jurisdiction** of the state or any city, county, district, authority, or public corporation or any agency thereof."

Please note, the examples noted above do not reflect a complete list of all false assertions of state-owned and federally-owned public lands within the DEIR. There are dozens of additional erroneous references to state or federal ownership of public lands blighted throughout the DEIR and supporting documents. The items in need of correction as noted above are not intended to be a comprehensive list of all such references. The examples cited above, along with all additional erroneous references, must be corrected.

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Again, it is critical for CA State Parks to carry at the forefront of all managerial operations and implications for HVSVRA (as well as all units within the CA State Park system) that state and federal agencies do not own our public lands. State and federally managed lands are a part of the public endowment, as all public lands are owned by the citizens of the USA (the public); CA State Parks, the Forest Service, the BLM, and all other state and federal agencies are merely contracted to manage those lands within the defined scope of limited authority that is granted by PRC, the US Congress, and the US Constitution. Thus, we assert the exigence that CA State Parks correct each item of erroneous language that states implicitly or explicitly that any state or federal agency owns our public lands.

SUMMARY OF RECOMMENDATIONS TO ACHIEVE A LEGALLY AND PROCEDURALLY COMPLIANT GENERAL PLAN

To avoid unintended consequences from implementation of the HVSVRA General Plan update, Cal4Wheel recommends that the DEIR incorporates the following:

1. Explicitly state within the DEIR that existing designated OHV routes, riding areas, campgrounds, and other recreation infrastructure are of equal value to the natural resources that are cited for protection in the DEIR.
2. All existing recreational infrastructure be categorized as protected infrastructure, not to be restricted, minimized, closed to access, degraded in functional value, or destroyed as a result of General Plan implementation, nor subsidiary Plans (WHPP, SOP, etc.) that extend from General Plan directives for HVSVRA operations.
3. Add the language as noted below (with details in pages 3-11 above) into the following sections of the Preliminary General Plan / Draft EIR:
    a. General Plan - Purpose & Goals: Insert “Policy GP-OHV-1” (Primary Purpose) into the opening Purpose/Goals chapter and into the Recreation Goals. (DEIR Project Description / General Plan Update text; see NOA Project Description and Purpose statements.)
    b. Land Use & Implementation - insert “Policy IM-OHV-1” and require mapping of Critical Park Infrastructure as an Implementation action and add MM-OHV-1 to the Implementation/Financing section. (DEIR Land Use Areas / Implementation chapters; see Preliminary General Plan Land Use Area mapping.)
    c. WHPP Appendix - add MM-OHV-MONITOR language to the WHPP and require the WHPP to adopt the Monitoring & Response Protocol and reopening criteria as enforceable components of the Plan. (WHPP Appendix / DEIR Biological Resources chapter.)
    d. Air Quality chapter - add MM-AQ-OP-1 (Operational Air Quality Monitoring & Response Protocol) and cross-reference to MM-OHV-MONITOR so air-quality triggers invoke the least-restrictive sequence and the restoration obligations. (DEIR Air Quality chapter; see Draft EIR conclusion identifying significant/unavoidable operational PM impacts.)
4. Add MM-OHV-MONITOR (Operational Monitoring & Response Protocol) to the Air Quality, Biological, Cultural, and Recreation chapters as enforceable mitigation (include numeric thresholds, ladder, reopening triggers, reporting, timelines).

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5. Add MM-OHV-INFRA (OHV Infrastructure Protection & Restoration Guarantee) as a binding mitigation requiring: documented trade-off before any permanent conversion, funded replacement/offset, mapped Critical OHV Infrastructure layer, and maximum reopening timelines for temporary closures.
6. Explicitly retain Condor Mesa trail/campground and connectivity components in the Final Plan and identify a funding and schedule commitment for their implementation; treat their early completion as an implementation priority to proactively alleviate increased, concentrated use in other areas of the SVRA.
7. Require creation of the OHV Infrastructure Fund in the Implementation chapter with seed funding identified prior to plan adoption.
8. Require public reporting and an OHV User Advisory Panel to oversee closures and reopenings
9. Modify the DEIR / Plan to omit any potential for extended or permanent closures and restrictions to existing open OHV routes and riding areas, camping, and other recreation infrastructure within HVSVRA in order to mitigate risk of litigation and remain compliant with existing law
10. Correct each item of erroneous language that states explicitly or implicitly that any state or federal agency owns our public lands - revise with clear language that accurately cites that HVSVRA as well as any other referenced state- or federal-managed public lands are in fact solely “managed” by each respective agency

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CLOSING

Thank you for your serious and thorough consideration of these comments. We request that CA State Parks:

1. Include each recommendation and revision in the Final EIR/General Plan
2. Publish draft redlines showing how the mitigation and policy language will be inserted
3. Provide a written response in the Final EIR explaining where and how each measure has been accepted, modified, or rejected, with supporting rationale

We would like to close by once again calling your attention to the vested interest that Cal4Wheel, other members of the outdoor recreation sector, local governments, and the general public have as vested stakeholders of CA State Parks and HVSVRA. We encourage CA State Parks to uphold their alignment with PRC, the CA State Parks mission and operating guidelines, and CA State Parks responsibility to manage our public lands within the scope of Constitutionally- and PRC-granted boundaries as contracted managers of our nation's public lands - the citizenry's prized national heritage.

California Four Wheel Drive Association would like to be considered an interested public for the proposed DEIR and General Plan update. Information can be sent to the following address and email address:

Rose Winn
California Four Wheel Drive Association
8120 36th Avenue
Sacramento, CA 95824
rwinn@cal4nrc.com

Sincerely,

Rose Winn
Natural Resources Consultant
California Four Wheel Drive Association

References

1. California State Parks. Off-Highway Vehicle Division. Hungry Valley SVRA General Plan Update and Environmental Impact Report, https://www.planhungryvalley.com/ .
2. U.S. Off-Road Vehicles Market Size by Vehicle (ATV, SSV/UTV, Off-Road Motorcycles, Snowmobiles), By Application (Utility, Sports, Recreation, Military), Industry Analysis Report, State Outlook, Growth Potential, Price Trends, Competitive Market Share & Forecast, 2018 - 2024. https://www.qminsights.com/industry-analysis/us-off-road-vehicles-market
3. California State Parks. Natural Resource Management. Accessed and referenced October 2024. https://www.parks.ca.gov/?page_id=22197#:~:text=California's%20State%20Park%20System%20encompasses,of%20the%20state's%20ecological%20regions.

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111912

Comment Letter O5

October 2, 2025

Katie Metraux, Project Manager
California Department of Parks and Recreation
Off-Highway Motor Vehicle Recreation Division
P.O. Box 942896
Sacramento, California 92496

Re: Comments on the Draft Environmental Impact Report for the Hungry Valley State Vehicular Recreation Area General Plan

Dear Project Ms. Metraux:

Thank you for providing us the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Hungry Valley State Vehicular Recreation Area (HVSVRA) General Plan update. Our organization works to protect Los Padres National Forest (LPNF), which is adjacent to the HVSVRA.

State Parks intends to formalize various trail connections and remove the existing barriers between LPNF and the HVSVRA along those routes. We are still concerned that, without proper restrictions on HVSVRA trails that connect to LPNF trails, there may be an increase in unauthorized use of designated LPNF routes or trespass off designated routes. As we pointed out in our scoping comments, both East Fraizer OHV and Tejon OHV are only open to motorcycles between May 1 and November 1 and are closed to other types of OHVs at all times (see the Motor Vehicle Use Map for the Mt. Pinos, Ojai, and Santa Barbara Ranger Districts of the LPNF in Exhibit A of our scoping comment letter). Conversely, the connecting route in the HVSVRA (Sterling Canyon Trail) is open to other types of OHVs in addition to motorcycles, though it is still unclear to us whether there are any seasonal restrictions on use within the HVSVRA.

We understand that State Parks will eventually develop a Road and Trails Management Plan at a later date. Such a plan will require additional environmental review and public comment periods, and we look forward to participating in that process. We hope that our concerns about future formalization of trail connections between LPNF and HVSVRA can be addressed in that plan. This will require that HVSVRA trails have vehicle and seasonal restrictions that mirror the LPNF trails they

connectto. The installation of physical width-based vehicle barriers on motorcycle-only routeswill be crucialto prevent trail damage and to decrease the likelihood of trespass.

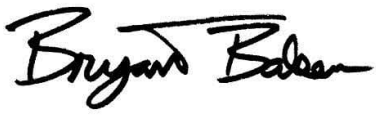
Additionally, we recommended in our scoping comments that State Parks update the General Plan in a way that better facilitates wildlife movement across the HVSVRA and reduces impacts of OHV use on wildlife where possible. We appreciate the development of the draft Wildlife Habitat Protection Plan (WHPP) and may submit additional helpful information to State Parks prior to the draft being finalized and adopted. We maintain that incorporating into the new General Plan the same requirements for lighting, fencing, facility siting, and protection of existing wildlife crossings (such as culverts) found in the Ventura County Habitat Connectivity and Wildlife Corridors Overlay Zone ordinances (see Sec. 8109-4.8 - Habitat Connectivity and Wildlife Corridors Overlay Zone in the Ventura County Non-Coastal Zoning Ordinance) would better allow wildlife to move across an already fragmented landscape. For example, the draft WHPP and DEIR state that "[n]ew fencing is always installed in a way that encourages wildlife passage." We appreciate that State Parks is considering wildlife movement when installing fencing, but both documents should have more detailed information and requirements about exactly how and what type of fencing is installed going forward. We continue to urge State Parks to coordinate and consult with the County of Ventura Resource Management Agency as the General Plan update proceeds.

Lastly, we support the Reduced Intensity Alternative as the DEIR identifies it as the environmentally superior alternative. We urge State Parks to select this alternative when finalizing its decision.

Thankyou for considering our comments on the DEIR. Please send us all future documents related to this project, and please do not hesitate to reach out if you would like to discuss any of the above issues in further detail.

Sincerely,

Bryant Baker, M.S.



Director of Conservation & Research
Los Padres ForestWatch

Comment Letter I-1

Gmail **Hungry Valley SVRA General Plan and EIR <lnfb@planhungryvalley.com>**

Hungry Valley SVRA General Plan Update and Draft EIR - Comment Period Closing Soon

Tiger Clifton <in2boarding1@msn.com> Thu, Sep 25, 2025 at 12:10 PM
To: Hungry Valley SVRA <info@planhungryvalley.oom>

When will the motocross track be open for riding? Thanks for the update. Tiger
Sent from my iPhone

On Sep 25, 2025, at 11:00 AM, Hungry Valley SVRA <info@planhungryvalley.com> wrote:

<image.png>

The Hungry Valley SVRA General Plan Update and Draft EIR Public Review Comment Period is Closing Soon

The 45-day comment period for the Draft EIR began on August 18, 2025, with the publication of the Notice of Availability (NOA), and will end on October 2, 2025. A virtual public meeting was held on September 16, 2025. If you were unable to attend the meeting you can access a recording on the project website.

Please use the comment form on the project website, or send your written responses via hard copy or email, including the name of a contact person, to the following:

Katie Metraux, General Plan Manager
Off-Highway Motor Vehicle Recreation Division
RO. Box 942896
Sacramento, California 94296
Email: info@PlanHungryValley.com

Visit the project website for additional information and updates.

We look forward to hearing from you!

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2 attachments

Imw-pna
370K

Imaga.pna
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Comment Letter I-2

DeBrito, Danny

From: Squarespace <form-submission@squarespace.info>
Sent: Thursday, October 2, 2025 12:51 AM
To: DeBrito, Danny
Subject: Form Submission - Public Comment Form - Hungry Valley SVRA General Plan Update Public Comment

Sent via form submission from *Hungry Valley*

Name: Aubrey Mollenauer-Vogelsang

Email: aubluvs4x4@yahoo.com, accepts marketing: true

Subject: Hungry Valley SVRA General Plan Update Public Comment

Message: Many of the ideas in the General Plan Update are progressive and look great on paper. Once put into practice, I could only hope they turn out just the same. I am mostly concerned about the new land acquisition aka Condor Mesa Area. Giving access to the park from Frazier Mountain Park Road AND building a RV park with full hook ups taking away from the allure of the natural aesthetic, views and experience. It may also have an impact on the area's limited resources. Many visitors know it's dry campingand that brings in a certain type of visitor to the park: those who don't mind roughing it for a weekend. They are aware that they bring water and power to the park of their own if they must have it. There is currently plenty of space for RV campers in most of the campgrounds. Ifyou are addinga place for anyone to have easy access and to just hook it all up, then you bring in a different clientele. In my opinion, those people are disrespectful and take things for granted. Soon after the RV area is up and running, the Rangers will see destruction, disrespect and trouble in the park. My other main concern is the water to run that area. Water is our most precious resource and there is not enough of it to start providing itto a Recreational Vehicle Park when the community barely has enough and is underwater restrictions. The existing community already struggles with keeping the wells full, clean, usable and functioning. The desire to create waste pits in the ground to have a service come clean sounds hazardous, unnecessary and potentially a waste of money. There are no city sewers for itto flow to, so septic pits are the only place for waste. It's as if they are just adding more pit toilets. Plus there are a couple of dump stations a few miles away that everyone uses. This RV Park proposal is really my only qualm with the GP.
I like to hearthatthe roadswill be repaired or redone, thatthe Motocross Track issues will be addressed, Air space will be created, and better communication will be established around the park. I think EV charging stations are a great addition. I like thatthe maintenance buildings will get repaired or replaced as well as some of the existing facilities. I am happy to see that the EIR is being taken seriously.
I appreciate the public comment opportunity as do my fellow 4x4 enthusiasts. Thankyou!
~Aubrey Mollenauer-Vogelsang

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