



July 10, 2012

AECOM

Attn: Chris Mundhenk, Project Manager

2020 L Street, Ste. 400

Sacramento, CA 95811

chris.mundhenk@aecom.com

Submitted via email: chris.mundhenk@aecom.com

Dear Mr. Mundhenk:

RE: Scoping Comments for the Carnegie State Vehicular Recreation Area General Plan Environmental Impact Report

Thank you for this opportunity to comment on the Notice of Preparation (NOP) issued on May 10, 2012, regarding the Environmental Impact Report (EIR) for the Carnegie State Vehicular Recreation Area General Plan and Tesla Expansion Project in Eastern Alameda County.

Greenbelt Alliance is a membership-based, non-profit public benefit organization that has been active in the San Francisco Bay Area for more than fifty years. We work to make the nine-county Bay Area a better place to live by protecting the region's greenbelt and promoting the development of livable, walkable, transit-oriented communities in the region through public policy development, advocacy, and education.

The NOP indicates that the intention of the Off-Highway Motor Vehicle Recreation (OHMVR) Division of the California Department of Parks and Recreation (CDPR) is to expand the Carnegie State Vehicular Recreation Area (SVRA) into the Alameda-Tesla acquisition land ("Tesla Park") to extend off highway vehicle (OHV) activities into these currently untouched 3,478 acres of open space.

Greenbelt Alliance is deeply concerned about the proposed expansion and the potentially significant impacts of this action. We also have concerns about the intended structure of the EIR. If OHMVR proceeds with an EIR for this expansion, the following issues deserve particular attention:

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Lack of Need for the Project:

It is unclear why the CDPR is pursuing the conversion of Tesla Park from its current condition as a protected natural area into an area for OHV activities. The State Parks Department 2008 Outdoor Recreation Report clearly identifies non-motorized low impact recreation opportunities as top priorities. In a time of fiscal crisis throughout California and particularly within the CDPR, this expansion appears unnecessary and ill-conceived. The EIR should thoroughly demonstrate why this expansion is needed at this time.

Inadequacy of Program Level Environmental Review:

The proposed acquisition lands contrast greatly with the lands already included in the existing SVRA. Tesla Park does not bear the same semblance and characteristics as the lands of the Carnegie SVRA, which has endured decades of erosion, vegetation damage and other environmental degradation from permitted motorized recreation use under State Parks management. Despite past attempts, Tesla Park has never been successfully approved for motorized vehicle use, and in its current state remains an untouched haven for many native animal and plant species as well as a critical habitat corridor for diverse wildlife.

As such, it would be inappropriate for the EIR of the General Plan Update to study the potential environmental impacts to these two very disparate sites within the same review. A program EIR is not sufficient for this site-specific decision. A project-level EIR analysis specific to the Tesla Park area must be completed before any decision is made regarding the expansion of off-road vehicle use and impacts into the area.

Impacts on Air Quality:

The Global Warming Solutions Act (AB 32) of 2006 mandates that California reduce its greenhouse gas emissions to 1990 levels by 2020. SB 375 of 2008 provides further policy mandates to reduce vehicle miles traveled. The expansion of the motorized trail system into Tesla Park would conflict greatly with the goals and stipulations of AB 32 and SB 375. Allowing off road vehicle activities into Tesla Park will significantly increase the amount of greenhouse gas emissions generated in the area, as well as the amount of other pollutants released into the air. Many OHVs are equipped with two-stroke engines that do not burn fuel completely and produce contaminants such as nitrogen oxides, carbon monoxide, ozone, and aldehydes in amounts many times greater than those of modern cars. The EIR should thus include an extensive and thorough study of the emissions that would be generated by OHV use in the site area and include measures to fully mitigate these impacts.

In addition, the air pollution, greenhouse gas emissions, and vehicle miles travelled of the project will have significant impacts on the health of neighboring communities. These impacts should be analyzed in a full Health Impact Assessment. This assessment should examine, among other things, how the project's proposed uses and generation of additional vehicle traffic to the project area could impact obesity, heart and lung disease and mortality rates, safety for bicyclists and pedestrians, and the number and rate of automobile accidents.

Impacts on Water Quality:

The existing OHV uses at the Carnegie SVRA have resulted in documented water quality and erosion impacts. As the Tesla Park area is located in the Corral Hollow Creek watershed, it contains a delicate and biologically significant system of intermittent and ephemeral streams

that would be damaged by soil erosion and pollutants generated by a motorized trail system in the area. Plans for the Tesla-Alameda area should thus be designed in a manner that avoids any further impact. The EIR should provide a thorough overview of past water quality impacts as well as the actions to resolve existing water quality issues.

Impacts on Biological Resources:

Tesla Park is located in the upland Coastal Mountain Range between Mount Diablo and Mount Hamilton. As part of the Diablo Range, Tesla Park serves as critical habitat corridor and an important link in the preservation efforts in the region. Tesla Park is also located within the Corral Hollow Creek watershed, which acts as a primary water source feeding the diverse plant and wildlife populations of the area. The watershed supports a surprisingly wide range of sensitive wildlife and plant species, including many that are threatened, rare and managed, such as the California Red Legged Frog, the California Tiger Salamander, and the Tule Elk.

Use of motorized vehicles in the area would contribute to the loss of habitat for these species in numerous ways, including conversion of native vegetation to road or trail surfaces, fragmentation of habitats due to road/trail system development, interruption in migratory patterns from loss of habitat connectivity, and direct mortality due to inevitable vehicle collisions. Given the unique biological diversity of Tesla Park, and the potentially damaging effects motorized vehicle use in the area could have on the habitat of many sensitive plant and wildlife species, the EIR must thoroughly evaluate all potentially significant project impacts on the biological resources of the area.

Effects of Climate Change on Project Area:

A substantial body of research demonstrates that greenhouse gas emissions are causing profound changes to California's environment, including increased wildfires, changing hydrological regimes, and increased heat-related public health threats. The EIR must include a thorough analysis of the full range of potential climate change effects on the project area, including changes to water supply and quality, public health risks from increased temperatures, threats to local agriculture from invasive species and other stressors, and impacts on habitats and species. The analysis should address the extent to which the effects of the project are more severe under changing climatic conditions (e.g. increased health impacts of air pollution and higher vulnerability of endangered species under increased temperatures) as well as whether the project may expose new residents to harmful or dangerous conditions (e.g. new hydrological threats)¹. It should also examine how the project may interfere with proposed and adopted climate adaptation strategies (e.g. land use measures that reduce energy demand during periods of peak usage).

As part of this analysis, the EIR should examine all documents related to the California Natural Resources Agency's *2009 California Climate Adaptation Strategy*², including its extensive bibliography; the California Energy Commission's Public Interest Research Program's climate science program; climate research by The Nature Conservancy; and the Stockholm Environment

¹ This should build upon the EIR's assessment of other current hazards such as potential for landslides. See California Geological Survey's "Susceptibility to Deep-Seated Landslides in California" (2011)
<http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2011/05/20/MN8C1JIE3N.DTL>
<http://www.conservation.ca.gov/CGS/information/publications/ms/Documents/MS58.pdf>

² <http://www.climatechange.ca.gov/adaptation/>

Institute's CalAdapt/Google Earth demonstration prototype, which provides geographically-specific climate impact data.

Impacts on Cultural Resources:

The Corral Hollow Canyon and Tesla hold a substantial place in our regional and state history. It has a well-documented cultural presence of indigenous peoples and contains an array of prehistoric artifacts that should be protected for their archaeological significance. The resource inventory for the General Plan and EIR must fully evaluate the indigenous cultural history of the Carnegie SVRA and Alameda-Tesla Expansion Area. An appropriate trail access plan and visitor management strategies should be outlined within the General Plan to ensure cultural resource preservation.

Growth-Inducement Effects:

The project appears to have many growth inducing components. Tripling the size of the Carnegie SVRA will bring additional recreationists to the area, putting pressure on surrounding lands for services to support these new visitors. It will also increase the amount of park and offsite law enforcement, emergency service, and park maintenance staff needed, creating pressure for additional housing and other services in the area. Some ranches and ranchettes along Corral Hollow - Tesla Road, which cover at least 500 acres, have already been converted to employee housing that is maintained by OHMVR funds. The EIR must study how these and other elements of the project may induce additional growth in the area and the environmental impacts of that induced growth.

Conclusion:

Tesla Park is a treasure for the San Francisco Bay Area and the State of California. The approval of this project would have devastating effects on the park and erode the ecological fabric of the entire San Francisco Bay Area region. We therefore urge the OHMVR to thoroughly investigate the full range of environmental impacts, mitigation measures, and alternatives for the project. This assessment will demonstrate that the project should -- and must -- be rejected to help protect the long-term viability of our historic and natural resources.

Thank you for your consideration of these comments.

Sincerely,



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