Re: Proposed Expansion of Carnegie State Vehicular Recreation Area onto 3400-acre Tesla site

Dear Director Mangat:

This letter is written on behalf of the Citizens Committee to Complete the Refuge and the Ohlone Audubon Society. We are part of a broad coalition of local groups, individual, officials and agencies which opposes the California State Park Off-Highway Motor Vehicle Recreation (OHMVR) Division’s plan to open the Alameda-Tesla area to Off-Highway Vehicle (OHV) use as an expansion of Carnegie State Vehicular Recreation Area (CSVRA).

The area that the General Plan Update proposes to expand existing CSVRA activities onto is a large and relatively undisturbed area, also referred to as Tesla. The Tesla site provides a unique mosaic of habitats for numerous federal/state listed species and an incredible array of special status species, which speaks to the importance of permanently protecting, preserving, and restoring the natural resources of entirety of the Tesla site for current and future generations of Californians.

The site is known to support a thriving population of the federal and state listed California tiger salamander and California red-legged frog, and other special status amphibians. The vast and relatively undisturbed nature of the site makes it an ideal location for these amphibians to thrive as they can safely travel from their summer estivation sites to breeding ponds. These species have been reported to travel up to a mile or more from estivation to breeding sites. Development, roads and trails fragment their habitat and make overland travel for these species perilous.

The site also supports breeding Golden Eagle and Burrowing Owls as well as countless other special status, native, migratory and nesting avian species. We are all well aware of the tragic impact of the wind farms in the Altamont Area on the Golden Eagle population. Tesla is an area where Golden Eagles can breed and forage free from harm. The Burrowing Owl population is undergoing alarming decline in Alameda County due in part to the rampant development that is removing vital habitat. These are just a few of the species that have found refuge within the boundaries of Tesla.
We have been extremely concerned about the lack of transparency and accountability that has already impacted the resources that exist on the CSVRA site. Annual habitat monitoring reports that are crucial to assessing the impacts of OHV use on water quality and natural communities have been often been missing in action, despite the fact that the site supports federal and state listed species. However, even under the best of circumstances OHV use is well documented to have significant adverse impacts on natural communities.

There is a fundamental flaw in the underpinnings of the efforts to expand OHV use onto the Tesla site, and that is the lack of transparency that existed at the time the Tesla site was acquired by OHMVRD and the fact that there was no public review process. Had a public review process occurred as it should have, the remarkable historic, cultural and natural resources of the site would have been disclosed. The impacts of OHV use on these resources assessed, and the conclusion that the site is not appropriate for OHV use would have been inevitable. It would have been concluded that the Tesla site is only appropriate for permanent protection and passive recreation.

The State Parks and Recreation Department of the State of California holds the deed to the Tesla park land. There are countless reasons why Tesla should not be incorporated into an expansion of CSRVA, the lack of accountability within the existing Carnegie aside. The Tesla site possesses incredible historic and cultural resources, and as important, increasingly rare natural and scenic resources. It is fitting that the State preserves these dwindling resources for the benefit of current and future generations.

Carnegie SVRA is in the midst of an EIR and General Plan process. We have expressed concerns regarding the adequacy of that process (previous comment letters attached). We request that you hold further action on this process until you can review its adequacy and appropriateness given the overall objectives and responsibilities of the State Parks Department. Viable alternatives do exist to permanently preserve the Tesla park land. We ask that you work with the local agencies and the community to find a solution that ensures that the Tesla park land is permanently protected now and for future generations.

Sincerely,

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Vice Chair

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