



**California Four Wheel Drive Association, Inc.**

*Over 55 years advocating for recreation*

December 9, 2019

California Department of Parks and Recreation  
Attn: Katie Metraux, Planning Manager  
1725 23<sup>rd</sup> Street, Suite 200  
Sacramento, CA 95816

email: [info@redrockgp.com](mailto:info@redrockgp.com)

Dear Planning Team:

This letter is submitted on behalf of the California 4 Wheel Drive Association (Cal4Wheel) and its membership concerning the request for comments for the *California Department of Parks and Recreation Red Rock Canyon State Park General Plan Revision*. Cal4Wheel represents clubs and individuals within the State of California that are part of the community of four-wheel drive enthusiasts.

While the main focus of Cal4Wheel is to protect, promote, and provide for motorized recreation opportunities on public and private lands, many of our members participate in multiple forms of recreation; including but not limited to hunting, fishing, camping, hiking, horseback riding, bicycle riding, and gem and mineral collection.

We recognized the positive health and social benefits that can be achieved through outdoor activities. We also recognize that motorized recreation provides the small business owners in the local communities a significant financial stimulus. And, our members are directly affected by management decisions concerning public land use.

Our members subscribe to the concepts of: 1) public access to public lands for their children and grandchildren; 2) condition and safety of the environment; and 3) sharing our natural heritage. The general public desires access to public lands now and for future generations. Limiting access today deprives our children the opportunity to view the many natural wonders of public lands. The general public is deeply concerned about the condition of the environment and personal safety. They desire wildlife available for viewing and scenic vistas to enjoy. They also want to feel safe while enjoying the natural wonders. Lastly, the public desires to share the natural heritage with friends and family today as well as in the future. How can our children learn and appreciate our natural heritage when native species are allowed to deteriorate and historic routes are routinely blocked or eradicated from existence?

**8120 36th Avenue  
Sacramento, CA 95824  
[Office@cal4wheel.com](mailto:Office@cal4wheel.com)**

**[www.cal4wheel.com](http://www.cal4wheel.com)**

**(800) 4X4-FUNN  
(916) 381-8300  
Fax (916) 381-8726**

Many Cal4Wheel members have routinely visited the Red Rock Canyon State Park and adjoining region since the early 1950s and are concerned with pending changes to the regional access. We encourage the Planning Team to fully consider the continued motorized access in Red Rock Canyon SP and maintain the existing network of motorized routes within the park, with special consideration for the routes that cross the boundaries of adjacent public lands historically used by motorized recreation.

In 1994, the California Desert Protection Act (CDPA) was signed into law. The law provided for certain lands within the California Desert Conservation Area, administered by the Bureau of Land Management (BLM), to be transferred to the State of California and incorporated with the existing Red Rock Canyon State Park. The intent of this action, as defined by the CDPA, was to provide protection of the region's outstanding scenic and scientific values.

Following the CDPA, the BLM began the process of transferring 20,500 acres (Last Chance Canyon Addition) to California State Parks. The result of which effectively tripled the size of the Park. A Memorandum of Understanding (MOU) was developed between the two agencies so that land not yet conveyed, or not able to be immediately conveyed due to encumbrance of unpatented mining claims, might be properly managed. The MOU gave the California Department of Parks and Recreation management responsibility for all 20,500 acres, regardless of the status of conveyance, with the exception of the mining claims.

Additionally, California Assembly Bill 3594 of 1974 created the California Recreational Trails System, which was amended in 1975. This system is governed by Division 5, Chapter 1, Article 6, Section 5070 of the Public Resources Code. Element (e) of this system concerns "Trails and areas for off-highway recreational vehicles".

Two major components of the act were the re-authorization of the "California Recreational Trails Committee" and the requirement to develop a "California Recreational Trails System Plan". These two requirements of the act are:

"5070.7. The director shall cause to be prepared, and continuously maintained, a comprehensive plan for the development and operation of a statewide system of recreation trails."

"5075.5. The director shall prepare a guidebook, including trail maps, describing the system."

The Parks and Recreation Department published the Trails Plan in May of 1978 in the form of a summary volume and four element volumes. Off Highway Vehicle Recreation, and Hiking and Equestrian Trails were two of the elements. As of the summer of 1990, a guidebook has never been published.

### **Hiking and Equestrian Trails Element**

The "Hiking and Equestrian Trails Element" has a section titled "The Plan for California". On page 50 there is a map of California titled "California Trail Corridors" which is defined as:

*"State trail corridors are linear zones of urban and rural landscape of unspecified width, within which specific hiking and equestrian trails can be located. Such corridors should be viewed as long-range planning tools to link natural, historic, and recreational resources to the state's urban population, we (sic) well as providing areas for potential loop and spur trails near urban landscapes."*

## **Off Highway Vehicle Recreation Element**

The Off Highway Vehicle Recreation element did not have a Trail Corridors plan or map. In a section titled "Land", it identified the state OHV parks and forty-nine other OHV parks of which nineteen were publicly operated. It also noted the large portion of state that is controlled by the USFS and BLM and available for OHV use.

In the section titled "Roles and Responsibilities", the roles of the Forest Service, the BLM, and the State Park System are described. On page 60 of this section, the plan states that:

*"The California State Park System will allow off-highway vehicle use as a secondary function at selected other units of the State Park System."*

*"Off-Highway vehicle use will be permitted for utilitarian transportation at the following units of the State Park System:*

*"Anza-Borrego Desert State Park - Designated routes of travel; there are some 600 miles of trail that may be used by off-highway vehicles."*

*"Red Rock Canyon State Recreation Area - Designated routes of travel through the state recreation area, to other off-highway vehicle routes."*

Although the Off Highway Vehicle Recreation element of the "Trails Plan" does not contain an OHV Trail Corridor Plan, it does state in Appendix 1:

*"The California Recreational Trails Plan is a policy plan intended to assist and guide trails development throughout the state."*

Of particular interest to motorized recreation are the Last Chance Canyon, Nightmare Gulch, and Dove Springs sections within the Draft General Plan and Cal4Wheel submitted comments addressing the continuance of motorized access to areas of the Park as outlined in the various "Concepts".

Red Rock Canyon State Park issued an Emergency Closure of Nightmare Gulch on October 9, 2013. The Emergency Closure was issued as a result of summer storm damage which caused significant damage to the existing route. While the closure is temporary, before any trail repair can be performed an environmental assessment is required. The storm damage on the Nightmare Gulch section was negligible and easily corrected while the storm damage to Last Chance Canyon area was significant and not as easily corrected.

While it is understood that some factors (raptor breeding season and Dove Springs is a permanent spring, a desert rarity) are involved that may potentially limit access, consideration of establishing a loop route which provides access to Dove Springs should be part of the draft plan developed.

Historically, the desert region is subject to periodic monsoon events which over time, along with geomorphic events, have altered the geologic landscape of the region and helped create the unique features of the region. Human interaction has also been part of the region, including filming/movie production, mining and recreation. The vegetation growth varies depending on annual rainfall which recovery quickly following disturbances. Over time, the terrain has changed and existing motor route conditions vary.

With the aforementioned as a basis, Department of Parks and Recreation has released four "concepts"; each with a different "purpose and need" statement related. Ironically, none of the four concepts and their individual "purpose and need" appear to coincide with the overall stated intent of the "purpose and need" to develop a General Plan revision for Red Rock Canyon State Park. Noting that a General Plan serves as a blueprint for future decisions about land use, facilities, recreation opportunities, and management of natural, cultural, and physical resources, among other topics, and is required by the California Public Resources Code (PRC §5002.2), one would think that the four concepts would have a direct correlation to addressing changing conditions, analyzing the latest information and data, and incorporate lands that have been added to Red Rock Canyon State Park since the existing 1982 General Plan was approved. Yes, a lot has changed in 35 plus years and a lot remains viable, 35 plus years later.

In reviewing the four proposed concepts, it is easy to eliminate Concept #3 and Concept #4 as not in accordance with the initial stated rationale for acquiring the Red Rock Canyon SP additions via the California Desert Protection Act in 1994.

Cal4Wheel members have a long history with recreation opportunities afforded by state and federal land managers in the region. They enjoy the prime resource values of the unit, and do not degrade these features, so future generations have the same experience and opportunity. They want appropriate development (management) in the park which enhances appropriate public use and provides for necessary management needs.

Under California Public Resources Code (PRC) Section 5019.53, each state park shall be managed as a composite whole in order to restore, protect, and maintain its native environmental complexes to the extent compatible with the primary purpose for which the park was established. Within that framework, Red Rock Canyon State Park was designated and expanded with assurances that existing access would be afforded to the public. Concepts #3 and #4 proposed to eliminate existing access and reduce overall public access to the region.

When reviewing Concept #1, the stated need and purpose is: "Red Rock Canyon State Park presents a stunning landscape for auto-oriented exploration. Red Rock Canyon State Park should provide an extensive, sustainable, primitive route network to maximize access to destinations in vehicles. This concept would require approval by the State Park and Recreation Commission to change the classification from State Park to State Recreation Area."

As noted in the documentation leading to the designation and future land acquisitions, a core tenet recognized existing “auto-oriented exploration” (motorized access) as a value for the current and future needs of the Red Rock Canyon SP. With State Park administrative process changes, those values have been relegated to “state recreation areas”. It is Cal4Wheel’s believe that factors that lead to designating and expanding Red Rock Canyon SP more than 35 years ago endorsed the “auto-oriented exploration” concept as a valid rationale for designation. As such, Concept #1 provides many of the basic desires endured by generations of recreationists visiting the region. Overall, motorized access is a principle means of public use and enjoyment of many other State Park lands within the system. As such, predesignation as “state recreation area” is an arbitrary condition impeding consideration, analysis and adopting either Concept #1 or Concept #2.

When reviewing the differences between Concept #1 and Concept #2, there are a few striking differences. One interesting difference is the designation of Sensitive Resource Zone and Limited Use Zones. Within Concept #1, much of the north and east portion of the Park is labeled as a Limited Use Zone. This area also includes a network of routes. In Concept #2, much of that area is designated as a Sensitive Resource Zone, while including substantially the same route network. However, Concept #2 does have an area, possibly the largest contiguous area, that is proposed for designation as a Limited Use Zone. That area has limited routes associated.

In reality, the zone designations do not match with traditional (historic) use patterns. Designation of Sensitive Resource Zone and Limited Use Resource Zone are suspect and provide for no benefit to on-the-ground management. The overly restrictive management prescriptions associated with designation of “Sensitive Resource Zone” limits management options in dealing with natural disasters (cyclic changes) to the desert natural environment.

Cal4Wheel is encouraged that some new Focused Use Zones are proposed. These are considered developed areas to meet public desire for camping opportunities, a much needed addition to the Park. However, Focused Use Zones are not a substitute or replacement for the ability to access remote regions of the Park.

The proposed Equestrian and Hiking Trailhead at Nightmare Gulch/Scenic Canyon is a welcome, albeit short-sighted, opportunity to provide for desired public access. Please note, Nightmare Gulch is designated as a Birds of Prey Natural Preserve. As such, motorized activity is restricted. And yet, the trailhead facilities are located well within the motorized access restricted zone.

Cal4Wheel recommends that careful consideration be given to include motorized access to Nightmare Gulch by way of the historic route outside active birds of prey nesting seasons. Similar accommodations have been designed for other similar instances in other federal and state management plans throughout the nation.

While Cal4Wheel does not directly represent private property owners, it is notable that proposed Concept #1 is the only proposal that acknowledges private property and the right of access to the property. Cal4Wheel encourages careful consideration to accommodate routes of travel that provide legal access to private property.

Overall, a designed system of routes to access various area of the Park is necessary to provide for public enjoyment and adequate management of the Park resources. It is understood that sensitive archeological resources may be in the region. National Historic Preservation Act Programatic Agreements have allowed for continued access to routes adjacent to archeological resources where adverse impact is minimal. And, barriers are frequently constructed to maintain the integrity of archeological sites.

In closing, Cal4Wheel submitted the above comments during previous public comment periods. Sadly, we fail to see those comments reflected in the current proposed plan. Cal4Wheel requests the final plan be modified to reflect continued use of a designated motorized trail system within Red Rock State Park that interfaces with adjoining motorized routes on neighboring public lands. We believe that providing for a designated system of well-marked routes will enhance the visitor experience for ALL visitors (motorized, equestrian, hiking and others) while providing for resource and cultural protection to the Park.

Cal4Wheel members, and the general public, enjoy visiting the scenic wonders afforded protection for public use. We encourage the future development of the general plan to acknowledge and provide for the desired public access and recreation experience offered by State Park units.

Thank-you for the opportunity to provide comments for consideration of the Red Rock Canyon State Park General Plan Revision.

Sincerely,



John Stewart  
Natural Resources Consultant  
California 4 Wheel Drive Association