



California Off-Road Vehicle Association

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December 16, 2022

California State Parks
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Submitted via email: planning@parks.ca.gov

Red Rock Canyon State Park Preliminary General Plan and Draft Environmental Impact Report

The following comments are based on the Preliminary General Plan Revision and Draft Environmental Impact Report for Red Rock State Park. We understand that the document is preliminary and will require approval by the Parks Commission for adoption. The Preliminary General Plan is accompanied by summaries of biological and cultural resource information; however, this is not detailed. We understand that there is additional resource information included in the draft EIR but this information also suffers from a lack of clarity. Much of the cited resource material seems unrelated to the questions at hand in the document, and may serve to confuse the public, rather than assist the public.

CORVA is an off-road vehicle organization with thousands of members throughout California that advocates to the preservation and protection of public land access for all forms of motorized recreation including OHV and 4WD. We strive to represent the interests of our members in the comments below. We have approached this project with the understanding that Red Rock Canyon is a State Park with a mission that is different from an SVRA. While SVRA's have a dual mission to provide quality OHV recreation and protect natural and cultural resources, other state parks operate under a mandate that emphasizes natural and cultural resource protection as a greater priority than off-road vehicle use. In addition, we recognize that a State Park must provide equal or greater opportunity for non-motorized recreation users and ensure conflicts of use between motorized and non-motorized users be avoided whenever possible.

Because Red Rock is located between the Jawbone/Dove Springs OHV areas, Randsburg and Spangler Hills OHV open area, there is an inherent or implied responsibility entrusted to State Parks honor long-standing agreements with the Bureau of Land Management to provide adequate and necessary access for OHV



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(non-street legal) registered vehicles to travel through the park as needed for connectivity between these areas. We appreciate that the Preliminary General Plan includes OHV designation of Sierra View Road and Red Rock Wash Road to meet this need. We question the designation of the adjacent Sensitive Resource Area because the quality of natural resources in that area is exceptionally low,

and the natural visitor experience is lowest in the park. This area is already highly impacted by development, and offers less visitor benefit due to proximity of Hwy 14, with no natural buffer for noise and effects of visual disturbance.

Most visitors to the area who seek a more significant OHV riding opportunity are likely to visit areas such as Dove Springs, Jawbone Canyon, or Spangler Hills, with a marked exception for 4x4 vehicles, which have historically enjoyed driving experiences in Red Rock State Park, most notably the Nightmare Gulch 4WD Trail. Because Red Rock Canyon State Park consists of an expanse of approximately 30,000 acres of desert all parties accept that it is necessary to designate a primitive road system that allows a wide range of visitors, including the elderly and disabled, to enjoy the park.

Green sticker use on Sierra View Road alone does not, however, address the historical use of green sticker use of vehicles that has existed even after the change in designation of the area from an SRA to a State Park. In addition to limiting transportation around the park a lack of green sticker access significantly restricts volunteer trail maintenance activities that have been performed for many years. This has been a key activity on routes of travel such as the Nightmare Gulch 4WD Trail. Appropriately trained and supervised volunteers have long provided a desperately needed supplement to Park maintenance activities and may require the use of green sticker registered vehicles. This should be allowed through a special use permit.

We submit that the current primitive road system, as shown on the attached map, serves to directly enhance the public's enjoyment of the natural, scenic, and ecological values of the park and is not an attraction in and of itself and is therefore consistent with the Public Resource Code. Stakeholder groups such as the Ridgecrest Roundtable, CORVA and a significant amount of others wish to express a great deal of concern that the Preliminary General Plan and Draft EIR reduces connectivity through the park, as well as limiting access to various points of interest such as Nightmare Gulch, Black Rock Canyon, and Roaring Ridge. Although the Preliminary General Plan offers a slightly expanded transportation system compared to previous concept plans, connectivity remains an issue.



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Motorized use of the baseline OHV trail system has occurred for over 40 years. Unaccountably, natural and cultural resources have been identified as being at some risk despite this lengthy history of use, even though the system has had little if any maintenance. In addition, the resource summary reports fail to recognize that significant storm events have undoubtedly caused far greater damage to natural and cultural resources in places such as Nightmare Gulch than road and trail use. It is apparent that these summaries concentrate on the effects of road and trail use to the exclusion of natural causes, nor do they present any comparison of the relative scale of effects from different impact to these resources. We submit that the effects of use of roads and trails by visitors are in fact negligible compared to natural storm events. This should be reflected in the draft EIR.

GENERAL COMMENTS

- We support maintaining access and connectivity from both Hwy 14 and Red Rock Randsburg Road.
- We are concerned because the Preliminary General Plan and draft EIR fails to consider mitigation of impacts to cultural resources in the cultural preserves planned for Black Rock Canyon and Nightmare Gulch as a way to preserve access to these important areas.
- We appreciate that Onyx Ranch SVRA will undergo a separate management plan as we previously requested.
- We appreciate that several existing roads originally proposed as closed have been designated as non-motorized trails rather than being removed from the inventory.
- We support the accommodation of equestrian uses and the addition of proposed primitive camping sites at Opal Peak, Sierra View, Red Cliffs, and Last Chance Canyon.
- We request that State Parks address issues surrounding maintaining artificial and natural water sources for wildlife.
- We support the use of cherry-stems and corridors for motorized access to lands within proposed preserves as has been included in the Preliminary General Plan.



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BASELINE CONDITION

In the concept document's Introduction, under Project Background, it states:
"California State Parks will build on the foundation of work from previous efforts related to the General Plan Revision, including efforts in 2002/2003 and 2008/2009."

The concept map entitled Existing Conditions, and the eventual CEQA no action alternative must therefore reflect all decisions implemented since the previous 1982 General Plan, including depicting designated routes at the time of transfer since closed by State Parks, and must be consistent with no action alternatives from prior planning efforts.

We appreciate that route closures taken under emergency action have been removed from the Existing Condition map. Emergency closures were imposed upon the public with little planning and even less explanation, leading to rumor and causing mistrust between the agency and affected members of the public. The Existing Condition is now much more representative of the baseline condition as it exists today.

Preliminary General Plan and Draft EIS

CORVA strongly believes the Preliminary General Plan should include routes shown as closed, including Roaring Ridge Road, Black Rock Canyon Road, Last Chance Canyon Road, and Nightmare Gulch Road for the reasons we have described above.

Route Specific Comments Provided by CORVA

Nightmare Gulch: Given the long history of use and connection to the 4WD community, we propose that the utmost effort should be exerted to keep this trail open to motorized travel. If no other approach is feasible, we would support this route being retained as a "special use permit" route. This requirement would reduce the amount of travel through the Gulch. It would also provide an opportunity to educate permit applicants about how to avoid impacts to cultural and natural resources.

We remain unconvinced that the emergency closure of Nightmare Gulch in 2013 was needed as a public safety measure. Facts through the years contradict that explanation, as many other more serious washouts had previously occurred without necessitating an emergency closure. The fact this closure was implemented without consultation with the affected community further compounded the error. Fast forward



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this analysis to 202, and the public is being forced to potentially face closure of a well-loved trail because of this unsubstantiated closure has resulted in years of neglect of a previously well-maintained trail. State Parks is mandated with serving Californians, rather than ignoring and disregarding the needs of Californians. This mandate has been woefully ignored during the years Nightmare Gulch remained closed to motorized travel.

If the access road to Nightmare Gulch must be gated for resource protection, barriers should be placed at either end of the Gulch as close as possible to the mouth of canyon. This would allow better hiking access to the most scenic part of the Gulch which is only about $\frac{3}{4}$ mile long. Visitors are most likely to access this area from the South, which would be the best location for a parking area.

A parking area near the middle section of Nightmare Gulch trail as was shown should be added if possible. We recognize that the Snow White Mine presents an obstacle to establishing such a parking area. We recommend that relocation of the road or trail from El Paseo Road through this area around the Snow White private inholding be considered. This parking area would be located closer to the more scenic section of the Gulch.

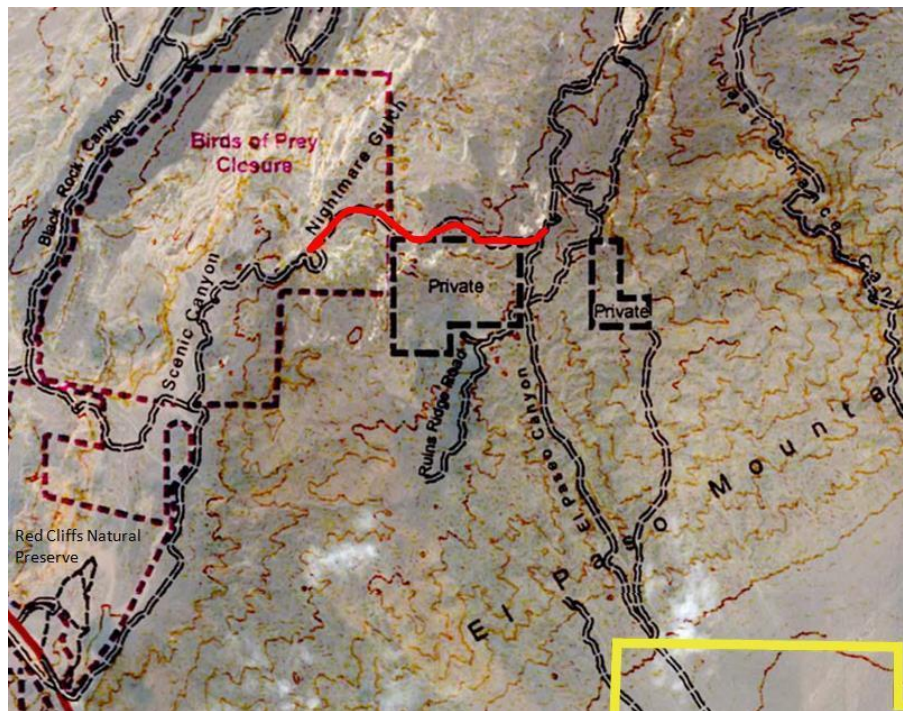


Figure 1 – Potential access route to Nightmare Gulch trailhead. This would be closer to the Gulch than the proposed hiking trail.



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Black Rock Canyon Road: we understand that Black Rock Canyon Road has a cultural resource site in a location that would make rerouting or relocation of the route exceedingly difficult, however we recommend that Black Rock Canyon Road remain open to the rock waterfall feature, which is located outside the proposed cultural preserve. The length and location of the route are unlikely to make it attractive as a hiking trail. Equestrian stakeholder groups may wish to comment on its suitability as an equestrian trail.

Black Rock Canyon Road skirts the edge of a proposed Natural Preserve and a proposed Cultural Reserve which allows it to avoid sensitive resources in the core of this preserve. Rather than close the entire length of the road to limit interior access the route should be remain open at CA14 and terminate near or at the head of the rock waterfall obstacle. Also access to the canyon should remain open to vehicles from the Joshua East Road southwest to the approximate boundary of the Proposed Cultural Preserve

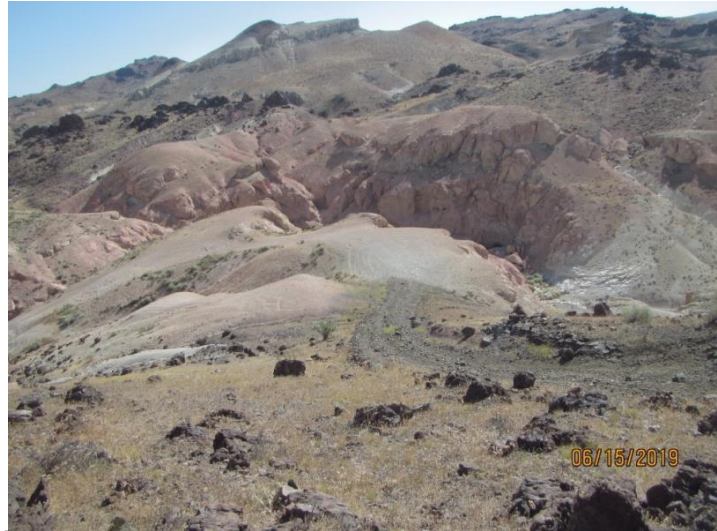
Iron Canyon Road: We appreciate the addition of Iron Canyon Road to the Revised Concept plan. Together with Tufa Point Road this allows a greater range of visitors to visit this scenic area.

Pinnacles Road: We appreciate that Pinnacles Road has been added to the system, however it is a dead end route that lacks a connection between El Paseo Road and Last Chance Canyon Road. The user created segment that was not included provides one of the few opportunities for a connection to Last Chance Canyon Road. This segment could be improved by adding full bench construction along the contour line as the trail descends into Last Chance Canyon. The natural barrier at the intersection of Last Chance Canyon Rd (gatekeeper) has held up well over the years and has long protected this route from inexperienced users. It is a unique route and one of only expert level opportunities remaining within Red Rock State Park.



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Pinnacle Road as it descends toward Last Chance Canyon Road

As an alternative the user created section of Pinnacles Road could be classified as a multiuse/hiking trail that ends at the proposed Cudahy interpretive site. For some reason this was not included in any of the concepts. This would be a pleasant hike through the spectacular rock formations along the trail.

Cudahy Creek Road: We deeply appreciate that Cudahy Creek Road has been retained as part of the primitive road system. Unfortunately, it is a dead-end route that does not provide the much-needed connectivity to Last Chance Canyon Road. This *is the only viable route* that connects the western part of the Park with Last Chance Canyon Road and points further east via Pleasant Valley Rd.

In addition, Cudahy Creek Road was in existence since as early as 1967 (USGS maps) and despite little if any maintenance it is in excellent condition. It has a very gentle grade except where the route exits the canyon and joins El Paseo Road, and that segment exhibits little if any erosion because it is located on bedrock.

Cudahy Creek Road has less entrenchment, erosion, or tread wear than most other routes in the park. Because it follows a drainage there are a number of dry creek crossings, but the channel is not incised and the approaches and departures at crossings are shallow, have a natural rock surface and there is little if any evidence of bank erosion.



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We understand that there are two major concerns related to connecting Cudahy Creek Road to Last Chance Canyon Road at the Cudahy historical site. One is the dry creek crossing; the other is the presence of the Cudahy historical site. With respect to the dry creek crossing, this could be mitigated with a seasonal closure. The crossing could be improved by reducing the approach and departure angles and if necessary, in channel work to improve the natural bottom hardening. Unfortunately, a hydrology report for this area was not available so we are unable to provide informed comments on this topic. We maintain that the public benefit of having this route connected to the rest of the system and elimination of a dead-end route far outweighs potential impacts from the stream crossing.

With respect to potential impacts from a Cudahy/Last Chance Canyon Rd connection, the present wood post barriers are intact and are providing an effective barrier protecting this site. Adding a more durable barrier such as welded steel pipe fencing would provide adequate protection for this important site.



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Typical creek crossing on Cudahy Creek Road. The road is in excellent condition, and there is little if any evidence of resource damage due to the crossing.

Establishing a route around the Cudahy Site to connect the North and South sections of Last Chance Canyon Road.

We previously recommended Improvement and extension of the mining claim access road adjacent to the Cudahy site to establish connectivity through this critical area. As support we provided a 2007 study by California Geologic Survey that identified a potential route, see the attached map, as #1 in Figure below.



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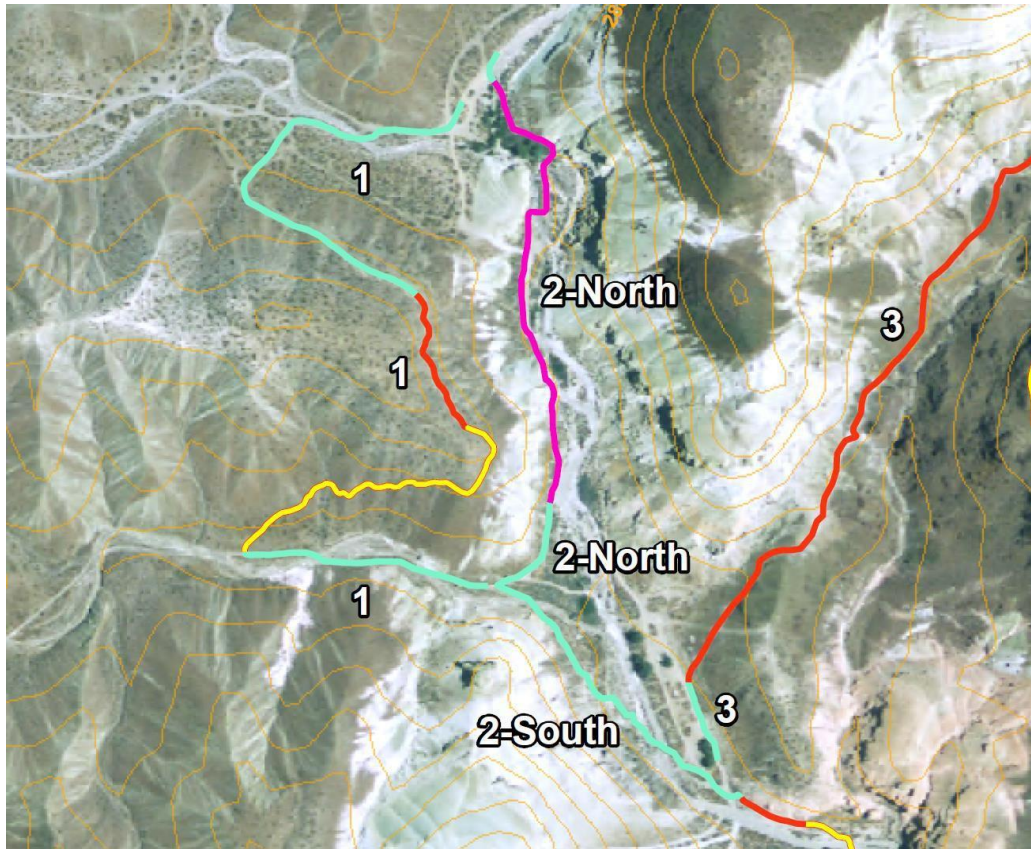


Figure showing trail #1 relocated around Cudahy Camp

We acknowledge that the cross slope in this area would make construction of the new section (yellow) difficult, particularly as a full width road that would allow 4WD vehicles. We suggest that this route be constructed as a single-track motorcycle route. This would require a much narrower bench cut and with proper trail design techniques this could be sustainable. We suggest that this reroute be included as a potential future project in the draft EIR, to be completed as a site specific CEQA project separate from the General Plan Revision.

Unnamed Route Parallel to El Paseo Road

We previously addressed an unnamed trail that runs parallel to Ed Paseo Road. It originates near the intersection of El Paso and Pinnacles Roads and connects to El Paseo Rd near the Snow White Mine. The approach to this trail has excessive grade but this could be addressed by improving the approach at the El Paso intersection.



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The unnamed trail appears to have had little use. Although the first quarter mile has excessive grade it has a naturally hardened rock surface that has held up extremely well over the decades with little if any trail widening, gully erosion, or soil loss.

The trail surface is 6"- 8" jagged rock which makes it unattractive as a hiking or equestrian trail. The trail runs along the ridge top and has outstanding views of Last Chance Canyon and the Nightmare Gulch drainage. Ideally it would be retained as a trail for street legal or green sticker registered vehicles. As a minimum it should be retained as a hiking trail as proposed, although with the rough, rocky surface and remote location it would receive little use.

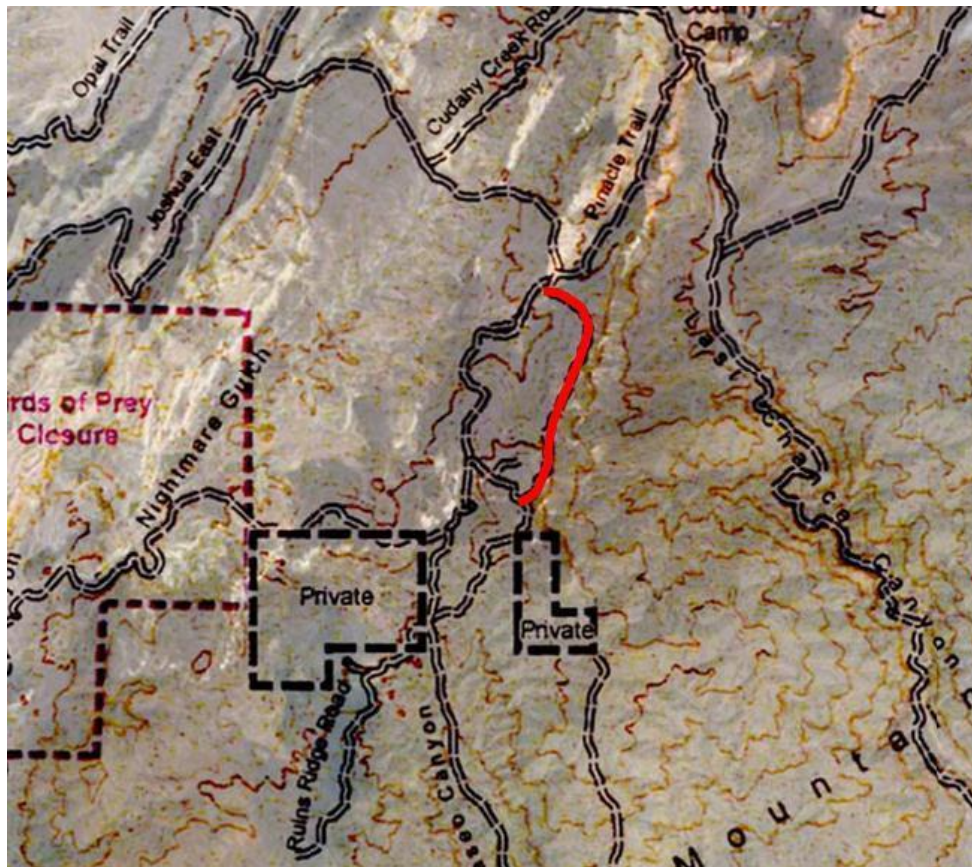


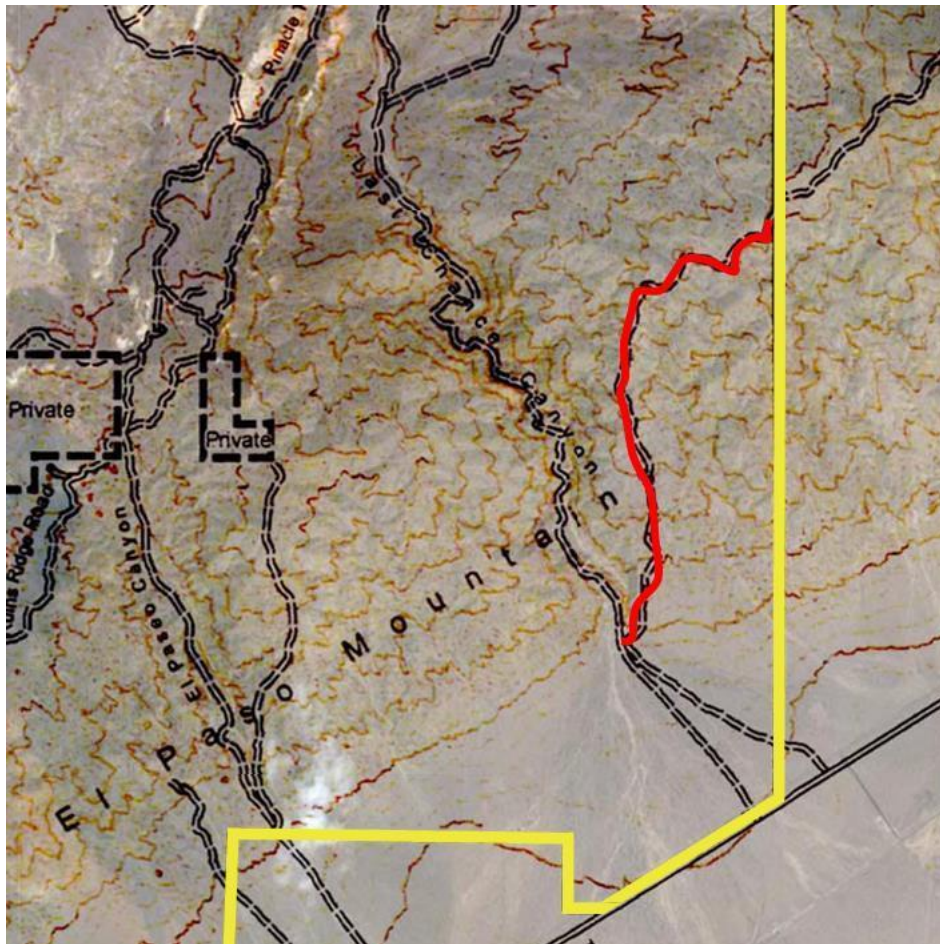
Figure 2 - Unnamed trail adjacent to El Paseo Rd



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Trail EP 107 is not included in any of the concepts. We previously commented on this trail. The reason for deletion of the trail is listed on the map as “resource issues” however no detailed information is provided. This trail is a two-track route that connects the Burro Schmidt Tunnel area with lower Last Chance Canyon. The plan needs to provide enough information to support the claim of “resource issues”; otherwise, the trail should be retained on the system.



Trail EP 107



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Summary

When considering acquisition and development of properties to expand off-highway vehicle recreation opportunities, the department may prioritize properties that have potential to serve large urban areas such as the Bay Area and Central Valley, offer potential recreational opportunities for off highway vehicle recreation, and potential opportunities for motorized access to nonmotorized recreation. Properties for consideration may include areas within existing State Parks and State Recreation Areas, including, but not limited to, Henry Coe State Park.”

SB 155, Signed by Governor Newsom, October 2021

This bill, SB 155, was designed to expand off-road opportunities in the state. The Red Rock Canyon State Park Preliminary General Plan provides an unparalleled opportunity for State Parks to realize the intention of SB 155 and find ways to fully incorporate motorized recreation into the Preliminary General Plan.

While reviewing both the Preliminary General Plan and Draft Environmental Impact Report it becomes clear that most of the material was prepared prior to the passage of SB 155, and additionally incorporated portions of documents or reports barely relatable to the current conditions, as they were prepared many years earlier. But since the Preliminary General Plan and Draft Environmental Impact Report were released for comment to the public in 2022, this obligates State Parks to incorporate the most recent and relevant criteria in the proposed plan. The lack of inclusion of any reference to SB 155 or include any proposal to how this plan incorporates the intention of SB 155 is unacceptable.

In addition to the lack of mention or reference to SB 155, there is a disturbing thread of anti-OHV and anti-4WD material that was allowed to be included in the documents. We reference; *“While the mode of travel within the Park has been via motorized vehicles, a visitor’s experience of the Park could be richer if other modes are considered. Enjoying vistas, discovering special places, and exploring unique environments can be enhanced through non-vehicular modes of travel such as walking, hiking, and horseback riding.”* (page 2-87/88) Subjective statements such as this do not have a place in State Parks documents as they clearly introduce an bias against the enjoyment of motorized recreation.

Additionally, *“The Park will be a welcoming place to all visitors, and outreach efforts will strive to connect with a broader cross section of Californians who can be enriched with the experience, understanding and appreciation of this special place.”* (page 4-4)



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“Hiking trails enrich visitors' experience by bringing them physically closer to nature. Hiking allows access to places away from roads, slowing down the visitor's pace through the Park and revealing the landscape from a different perspective. While existing roads are “walkable,” they are designed primarily for vehicular traffic. Trails that are designed for hiking function differently from these roads because it considers the view and experience from a pedestrian scale. Trails designed for hiking promote a more intimate experience that incorporates experience at all sensory levels uninterrupted by the noise or the glass panels of a car.” (page 2-88)

Again, statements such as these hold no valid place in documents presented to the public by State Parks. The bias exhibited and presented to the public is unfortunate and must be removed from the document. For many visitors, wheeled forms of recreation enhance visitation to the park and enable wider areas of the park to be experienced. Instead, we welcome State Parks to include motorized recreation as an integral part of the Red Rock Canyon State Parks experience.

It is inherently clear that the current Preliminary General Plan and Draft Environmental Impact Report is cobbled together from various documents, reports and studies produced for previous attempts to produce a general plan. Not all those studies are up-to-date, additionally patterns of recreation were changed as a result of the pandemic years with more people traveling and exploring throughout the state. These changes must be reflected in the proposals moving forward. Otherwise, what we see is a rehash of previous ideas with a predetermined outcome that was crafted to exclude as much motorized recreation opportunities as possible. While this would please some who call for the elimination of motorized recreation opportunities, it does not reflect the greater need for access to state parks for all Californians.

Sincerely,

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