

# STEWARDS OF THE SEQUOIA

Non Profit 501c3  
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July 31, 2019

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

Emailed to info@RedRockGP.com

Re: Comments Red Rock State Park General Plan Revision Issues

Dear Ms. Metraux,

Please include these comments in the public record and consider them as you revise the Red Rock State Park general plan and draft alternatives.

State Parks held public meetings on March 26 and 27 to release their "preliminary planning concepts" for the Red Rock State Park General Plan. We find the "existing conditions" and four "concepts" to be a travesty in planning for many reasons some of which are listed below.

1. We object to State Parks developing a Preferred Concept until they first develop a range of concepts that address issues raised by the public and which are based on correct data.
  - All of the State Parks draft concepts contain flawed information such as showing motorized trails as existing non motorized, such as Nightmare Gulch..
  - State Parks has failed to develop a concept in response to comments regarding the need to keep Nightmare Gulch open to motorized use.
  - State Parks also failed to provide a concept to provide more motorized access as requested by the public and to address increasing use of motorized routes.
2. Under CEQA 210002.1 the State Parks is required to identify significant effects of the project and to indicate the manner in which those significant effects can be mitigated. Yet State Parks has refused to address any issues on Nightmare Gulch or Last Chance Canyon, or how they might be mitigated. While we have repeatedly asked State Parks for all documentation regarding Nightmare Gulch, State Parks has failed to provide to the public any valid justification for their continued 2013 temporary closure of the route. Instead claiming there are safety issues,, but without showing any specific safety issues. Indeed there are numerous videos of many stock jeeps safely driving the entire length of Nightmare Gulch route after the landslide which prompted the subsequent safety closure of the route. State Parks has also failed to provide the reports that the Audubon Society was required to make to BLM and State Parks annually, on the conditions and trends of sensitive resources in Nightmare Gulch per the Record of Decision in the 1982 Red Rocks Plan. State Parks must make those reports available to the public now as part of the review process for this plan revision.
3. State Parks knows that many organizations, including Stewards of the Sequoia, Bakersfield Trailblazers, Ridgecrest Geargrinders and Trails Off Road, have been working with State Parks for

five years in writing to remove the temporary closure on Nightmare Gulch. Furthermore State Parks feels that motorized access is so important that it designated a primitive motorized road system including Nightmare Gulch in their current Red Rock General Plan, which may also be referenced on drawing #17498 on Page 33 of the current Red Rock State Park Plan. Also the 1985 MOU Appendix IIII between State Parks and the BLM states that Nightmare Gulch is open to vehicle use. However each of the Red Rock State Parks new "concepts" list Nightmare Gulch as an existing non motorized route. This is clearly untrue.

Nightmare Gulch has been a motorized route for many decades and continues to be one. The Red Rocks Plan 1988 Amendment 6 confirms Nightmare Gulch is an existing route open to motorized use. While Nightmare Gulch may be under a temporary closure that State Parks has been dragging their feet on for five years, and for which there appears to be no valid justification, Nightmare Gulch is still a motorized route and State Parks knows it. The new State Parks "existing conditions" map is therefore false as well as all other "concepts" since they are showing Nightmare Gulch motorized route as non motorized.

At best State Parks has acted in an arbitrary and capricious manner by claiming motorized routes such as Nightmare Gulch are non motorized routes. At worst State Parks is ignoring public input, intentionally misleading the public, closing routes illegally and seeking a pre determined outcome in violation of CEQA.

4. Based on the large amount of input Stewards of the Sequoia and others have provided to State Parks in favor of motorized routes and Nightmare Gulch in particular, we fail to see how State Parks did not have at least one "concept" with Nightmare Gulch open to motorized use. This also smacks of a pre determined outcome.
5. We feel State Parks claiming that existing motorized routes are non motorized is just a continuation of their anti motorized bias, which has been evident during the ongoing five year temporary closure of Nightmare Gulch while State Park turned away motorized volunteers, and illegally closed many other motorized routes in the park over the past several years.
6. CEQA section § 21002 requires State Parks to consider feasible and reasonable alternatives, but State Parks has not offered any options for continued motorized use of Nightmare Gulch. Clearly it is feasible to continue to allow motorized use of all existing routes including Nightmare Gulch and Last Chance Canyon. It may be that there are issues on these routes, but State Parks has not shown any willingness to discuss any specific issues or how they might allow continued motorized use of Nightmare Gulch or Last Chance Canyon routes. State Parks is fully aware of the importance of these primitive motorized routes to the public and the economy. State Parks Superintendant Dingman claimed at the recent public meeting that he proposed Nightmare Gulch route to allow motorized use but it was rejected. How could it be rejected when it has clearly never been considered or any mitigation discussed? This is another clear violation of CEQA.
7. Under the State Parks Forward Initiative and Transformation Program, State Parks is supposed to increase public access. Closing motorized routes such as Nightmare Gulch would be contrary to these initiatives. State Parks needs to have "concepts" that increase public access in the Red Rocks Park plan.
8. None of the "Concepts" show what is being changed. They do not show what routes are being closed or where there is a change in use. As such the "concepts" are misleading. Nebulous statements are made in each 'concept' such as that "some primitive motorized routes would become non motorized" or "potential new non motorized routes'. What routes? State Parks needs to fully disclose in writing what routes are being closed or have a change of use, and then discuss this with the public at planning meetings prior to drafting alternatives.
9. State Parks makes value judgments as if they are selling the proposal to the public, such as there being "minimal changes to the motorized route network" in concept #1. However State Parks clearly does not understand the value of routes. The loss of any motorized routes is not a minimal

change. Over the past thirty years far too many motorized routes have been closed in California Deserts, concentrating use and needlessly increasing environmental impacts. That State Parks would close Nightmare Gulch or claim it is non motorized is especially troublesome. This route has been adopted by a motorized group for thirty years. The State Park "concepts" must clearly show specific route changes and refrain from value judgments in their plan..

10. While State Parks has not yet done a usage study or recreation demand study, it is quite obvious that there was far more motorized use on routes such as Nightmare Gulch and Last Chance Canyon than non motorized use due to them being so remote, as well as having a very short non motorized season of use due to extreme heat.  
What justification does State Parks have for closing motorized routes to the majority of users? Why would State Parks deny access prohibiting the majority of the public from accessing the scenic Nightmare Gulch as they have been able to enjoy on this motorized route for generations? There is a clear need to do a recreation demand study. However there are numerous studies available which show motorized recreation to be the largest and fastest growing form of recreation.
11. What consideration has State Parks given to the negative economic impacts of closing routes to historic motorized use? Economic studies such as "Outdoor Recreation" by the USDA and "How Big Is Outdoor Recreation" by the Bureau of Economic Analysis and "Outdoor Recreation Economy" by Outdoor Recreation Association, all found motorized recreation to be the largest form of recreation by far and the largest recreation contributor to the economy. The Red Rocks area communities and Kern County cannot afford to lose this motorized economic income by closing motorized routes and connectors.
12. There has been no discussion of increasing or reducing motorized access during the planning process thus far, merely repeated statements by State Parks that they are working on it. Where is the documentation? Where is the "concept" with more motorized use? State Parks needs to clearly identify any issues it may have with motorized use in writing and open this up for discussion with the public during the planning process prior to developing "concepts" or alternatives.
13. Conditions have changed since the 1982 Red Rock General Plan in as much as motorized use of the park has increased dramatically, indicating the need to preserve all existing motorized access and increase motorized access.
14. The State Parks "Summary of Comments Received in Response to Notice of Preparation for the Red Rock Canyon State Park General Plan Revision (October 2018)" listed the following public comments, yet none were addressed in any preliminary concept-
  - Open more trails for OHV use
  - Open OHV access to Dove Springs
  - Reopen Nightmare Gulch for OHV use
  - Preserve historic OHV routes for future generations of motorized users and the disabled
  - Take into consideration the technical advances in OHVs, increase of OHV use, and increased popularity of extreme sports since the time that the General Plan was written in 1982

<https://www.redrockgp.com/s/Scoping-Summary-RRCS-Plan-Revision.pdf>

We look forward to State Parks addressing the above by-

- Providing the public with Red Rocks State Park map #17498 and 1982 plan Appendix in order for the public to be able to comment on the current plan route status.
- Developing a full range of concepts including one keeping all existing motorized access routes and another concept increasing motorized access routes in response to comments from the public and to address increasing need for motorized routes now and for future generations.
- Revising "existing conditions" concept to show all motorized routes including Nightmare Gulch as existing motorized routes.
- Showing Nightmare Gulch as an existing motorized routes, even in "concepts" where it is proposed to be closed to motorized.
- Identifying specifically what routes are changing use or closed to motorized use for each "concept"
- Identifying significant impacts and how they may be mitigated for any issue State Parks may have

- and incorporating that into "concepts".
- Releasing to the public all reports since 1988 which the Audubon Society was required to make under a CMA to BLM and State Parks annually on the conditions and trends of sensitive resources in Nightmare Gulch per the Record of Decision in the 1982 Red Rocks Plan.
  - Showing how State Parks is going to confirm with State Parks Forward mandate to increase public access in the Red Rocks plan.
  - Showing how State Parks has considered economic impacts of closing routes to motorized use.
  - Hosting another round of public meetings to release and discuss the above new and revised concepts, documents, issues and possible mitigation.

Thank you for considering our comments and we look forward to State Parks to providing a full range of concepts as well as revising the "existing conditions" and other "concepts" to comply with CEQA and providing the information required for the public to take part in developing the Red Rock State Park plan alternatives.

Sincerely,

Chris Horgan  
Executive Director  
Stewards of the Sequoia  
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CC: State Parks Director Lisa Mangat  
Brian Robertson, OHMVR Division Chief  
Ted Cabral OHMVR Commissioner  
Jerry Grimsley Ridgecrest Geargrinders  
Jeremy Rowell, Bakersfield Trailblazers  
Joe Rodrigues 395 Jeep  
Ed Waldheim, Friends of Jawbone  
Amy Granat, CORVA  
Lorelei Oviatt, Kern County Planning  
Supervisor Mick Gleason  
Congressman Kevin McCarthy  
Assemblymember Shannon Grove  
Mark Cave, California Four Wheel Drive Association  
Steve Williams, Kern County Sherriff

*"Since being founded in 2004, Stewards of the Sequoia continues to be the largest on-the-ground organization of volunteers in the Sequoia National Forest. Our crews have maintained over 3300 miles of trails and have planted hundreds of trees in reforestation projects. We represent in excess of 3000 members whose activities include camping, hunting, fishing, hiking, mountain biking, motorized recreation, boating, windsurfing, rock climbing and horse riding"*

Promoting Responsible Recreation & Environmental Stewardship