

#9-1 California State Parks (CSP) appreciates your support for the ABDSP and the efforts that both the park staff and public have undertaken in its preparation. CSP concurs that the Cultural and Natural Management Plans are high priority. As state funding opportunities allow, we will expeditiously pursue completion of these plans. It is possible that the completion of these plans will be done in phases to allow the most critical resources issues to be addressed sooner. As discussed in the General Plan, these planning efforts will be subject to CEQA compliance, and appropriate public review, as focused projects under the General Plan.



CALIFORNIA
WILDERNESS
COALITION

The Voice for Wild California

September 13, 2004

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9-13-04

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**Re: Comments on the Anza-Borrego Desert State Park Preliminary
General Plan & Draft Environmental Impact Report**

Dear Environmental Coordinator:

The California Wilderness Coalition (CWC) thanks you for the opportunity to review and comment on the Anza-Borrego Desert State Park Preliminary General Plan & Draft Environmental Impact Report. CWC has more than 5,000 members and more than 200 member organizations and business sponsors. It is the only organization dedicated to protecting California's wild places and native biodiversity on a statewide level. Through advocacy and public education, CWC builds support for threatened wild places, from oak woodlands to ancient forests and deserts.

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At the outset, CWC wants to thank the Anza Borrego Desert State Park (ABDSP) managers for working hard to protect the irreplaceable natural and cultural resources that find their home within park boundaries and for thinking on a broader scale about the impacts across boundaries. CWC recognizes the challenges in managing the Park to protect its resources while providing recreational opportunities for the public to enjoy and learn from. We applaud the efforts of Park management to find a balance between the two in a sound document resulting from years of study and a great deal of public input.

CWC supports either the Preferred Alternative (PA) or Alternative 3 (the Environmentally Superior Alternative) with encouragement that the Cultural Resources and Natural Resources Management Plans be prepared immediately following approval of the GMP to provide a baseline for other management plans. Our specific comments follow.

9-1

#9-2 CSP thanks you for your support.

#9-3 CSP thanks you for your support of the proactive management goals for park resource integrity. The Natural Resources Management Plan will address a more detailed assessment of the flora and fauna within the park's varying ecosystems. This will enable future park managers to more effectively manage natural resources in the appropriate context.

#9-4 Anza-Borrego has met with Ocotillo Wells SVRA staff to make joint management a higher priority and to safeguard State Park resources, while preserving the mission of the Off-Highway Vehicle Area. Signage, law enforcement patrols, informational handouts, aerial recon and patrol, and personal contacts with users are all being implemented to protect the integrity of Anza-Borrego Desert State Park.

#9-5 As discussed in Sections 2.1.4 and 3.3.1.10, CSP agrees.

#9-6 The Department's Inventory and Monitoring Program is applicable to many types of planning efforts. CSP agrees that the determination of Carrying Capacity is just one effort that benefits from ongoing inventory and monitoring actions. CSP's intentions are to monitor the condition of natural and cultural resources so that neither visitor use nor other forces compromise the integrity of those resources.

Park Purpose, Mission, Vision, and Goals

9-2

CWC supports the Park Purpose, Mission, and Vision and finds that they are consistent with the mandates in the California State Parks' Mission and State Park classification, PRC §5019.53, to preserve and protect park resources. As a whole, CWC also supports the Park's stated goals and guidelines as they set forth a proactive strategy to protect its resources through management within park boundaries, participation in planning processes and partnerships outside of park boundaries where activities may impact park resources, and through acquisition of properties surrounding the park.

Management approaches

9-3

The precautionary and proactive approaches to management set out in the goals and guidelines are appropriate for protection and preservation of Park resources. For instance, taking steps to protect park resource integrity when in imminent danger even if the desired sound scientific data is unavailable (3-18), treating species not yet listed as though they are when they meet the criteria (3-23), and focusing on appropriate levels of biological organization, such as biological landscapes, to manage for the health of a species (3-23). CWC expects that the Natural Resources Management Plan will provide a more detailed assessment of the flora and fauna within each management zone and how management activities in that zone will affect the natural resources so that these management approaches will be effective in context.

9-4

Management of Park resources is also properly viewed within natural boundaries, such as watersheds and groundwater basins, rather than completely contained within artificial property lines. Although the jurisdiction of Park staff does not go beyond the Park boundaries, they can be a strong voice in activities happening outside of the boundaries and should be involved in planning processes, cooperative efforts to protect resources, etc. It is unclear, however, what will be done to minimize conflicts in land use at the boundaries of the Park. For instance, where the Park boundary meets the Ocotillo Wells State Vehicular Area, how does the Park ensure that off-road vehicles do not stray into the Park? CWC expects that this level of detail will be forthcoming in the Natural Resources Management Plan, and likely other specific management plans.

9-5

Acquiring land outside of park boundaries to enhance the integrity and preservation of natural and cultural resources is necessary. CWC is extremely supportive of efforts to acquire land to foster habitat connectivity and landscape (natural and cultural) linkages, minimize negative adjacent land use effects and eliminate adjacent land use conflicts.

9-6

CWC supports the Inventory, Monitoring, and Assessment Program in regards to Park carrying capacity. CWC suggests that this should be implemented through each subsequent management plan (i.e., natural resources, cultural resources, roads, camping, etc.), rather than only through management plans for proposed visitor-use projects.

#9-7 CSP agrees that restoration is a duty required of future park managers. Throughout the Existing Conditions and the General Plan Goals and Guidelines, there are references to restoring disturbed areas and protection of the Park's resources. Additionally, future management plans will address detailed restoration.

#9-8 Thank you for your support. As discussed later in Section 3.2.1, "the challenge of park managers is to provide public access to and enjoyment of the resources without sacrificing the very resources that the public values for recreational experiences." CSP believes that the General Plan provides the guidance necessary to protect the Park's resources.

#9-9 CSP has left the existing trail and other portions of Coyote Canyon as Backcountry Zone to allow continued visitor access into this area during the non-critical months. The entire trail is open to mountain bike use and vehicles can access all but the middle portion of the trail either by direct access or on the Lower Willows Bypass. Designation of a Cultural or Natural Preserve would preclude many of the current recreational users from accessing this site. Protection of valuable resources may be accomplished other methods including trail rerouting, limited camping or seasonal closures.

#9-10 CSP agrees with the importance of the newly acquired Vallecito Ranch and that much of it has wilderness qualities. However, much work needs to be done to restore the ranchland habitat. Enormous quantities of non-native tamarisk will be removed in future resource management projects, requiring the use of heavy equipment, chainsaws, weed watchers, and herbicides. It is expected that large thickets of tamarisk will be removed with tractors and that large-scale pile-burns may be used to remove the exotic biomass from the system. The large agricultural fields on the east half of the ranch will be replanted with native mesquites, saltbush, and willows, and will require water from the existing ranch well for at least two to three years for re-establishment. These management efforts can be accomplished in the State Park designation, but would be greatly hampered by designation of State Wilderness or Natural/Cultural Preserve. Much of the ranch is a "work in progress." Subsequent to the restoration work, portions of the property may be considered for Natural or Cultural Preserve.

9-7 Restoration of degraded Park resources is only minimally mentioned throughout the Goals and Guidelines. According to PRC §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." Restoration is a duty required of State Park management and should be made more evident throughout the GMP.

Recreation

9-8 High quality recreation is defined as "that which is completely dependent on the 'high quality' of the natural and cultural resources within a State Park." Furthermore, "The degree of 'high-quality recreation' is directly proportional to the degree of success in preserving the state's most valued natural and cultural resources." (3-3). CWC supports Recreation Goal 1 to maintain the Park's qualities of solitude and wildness, with management decisions favoring the health and well-being of desert environment for its sustainable use. (3-41). CWC also strongly supports the incorporation of the "deeper" values in appreciating the desert environment in Park management decisions. (3-43). The vast desert spaces with its dramatic landscapes, changing colors, dark skies, and absolute quiet impact many of its visitors at a very spiritual level that cannot be accounted for with hard data. Often those values are overlooked when making management decisions, but with growing populations and stresses in everyday life, it is becoming ever important to have such places protected to which people can escape, calm, and rejuvenate.

Area-specific goals

9-9 CWC applauds on-going Park efforts to protect Coyote Canyon's sensitive resources, including the endangered bighorn sheep and Least Bell's Vireo, from continued threats of incompatible recreational use. CWC encourages the serious consideration of this area as a cultural/natural preserve in the forthcoming management plan, or at least, designation of the whole area as wilderness instead of leaving pockets of backcountry within wilderness.

9-10 CWC supports the goals for Vallecito Ranch. As documented in the General Plan, this area is extremely important ecologically, culturally and historically; it "contains a diverse number of resources that include wetland habitat [important to endangered species such as the bighorn sheep and Least Bell's Vireo], habitat connectivity [abuts the Sawtooth Mountains Wilderness area], archeological and historical sites, trails, and roads." (3-56). CWC is not convinced, however, that the Backcountry zone designation in both the PA and Alt 3 will reach these goals. Given the importance of the area and the existing knowledge of the valuable resources here, the goals of protecting and restoring those resources, and the fact that the southern boundary of the parcel adjoins an existing wilderness area, it would make more sense to designate this area as wilderness or a cultural/natural preserve.

#9-11 CSP concurs that the Cultural and Natural Management Plans are high priority. As state funding opportunities allow, we will expeditiously pursue completion of these plans. It is possible that the completion of these plans will be done in phases to allow the most critical resources issues to be addressed sooner. As discussed in the General Plan, these planning efforts will be subject to CEQA compliance, and appropriate public review, as focused projects under the General Plan.

#9-12 CSP agrees with your comments regarding inherent aspects of the wilderness designation. West of the Tamarisk Grove campgrounds, wilderness was not proposed in the Preferred Alternative due to the presence of SR 78 and utility easements. The existing San Diego Gas & Electric 69 KV power line passes through this area as well as telephone and an unused power easement. These uses are not conducive to wilderness but the site will be subject to the protection of natural and cultural resources per the General Plan Goals and Guidelines. CSP agrees that wilderness will be accessible to parks users immediately off the corridor roads. The consistency of the wilderness acreage throughout the document will be corrected to read 55,797 acres although this figure is an estimate, based on GIS data.

#9-13 CSP will allow greater public access to undeveloped natural lands in Anza-Borrego, particularly as public access is provided to new acquisitions. However, this new access will be planned in accordance with Park stewardship policies and the General Plan Goals and Guidelines. Throughout the General Plan Goals and Guidelines, there are references to restoring disturbed areas and protection of the Park's resources. For example, please note the Goals – Community 3, Interpretation 1, Cultural Resources 3, Link 1, Bio Processes 1, Biota 1, Hydrology 1, Soils 1, Geology 1, and Data 1. Implementation of the management plans may create new trails or roads but also may suggest rerouting or eliminating roads and trails in resource sensitive areas. The Natural Resources, Cultural Resources, and Interpretive Management Plan Sections specifically recommend the development of strategies to protect and preserve the Park's resources.

Preferred Alternative and Alternative 3 (Environmentally Superior Alternative)

9-11

CWC supports either the PA or Alternative 3 (the Environmentally Superior Alternative) with encouragement that the Cultural Resources and Natural Resources Management Plans be prepared immediately following approval of the GMP to provide a baseline for other management plans. When developed, CWC expects to be notified of the anticipated timeline for completion of subsequent management plans.

Wilderness

CWC strongly supports further designation of wilderness in the park¹, particularly when those areas are already roadless. A wilderness area is one “where the earth and its community of life are untrammelled by man and where man himself is a visitor who does not remain.” PRC §5019.68. In wilderness, “the imprint of man’s work [is] substantially unnoticeable,” and “outstanding opportunities [exist] for solitude or primitive and unconfined type of recreation.” *Id.* Wilderness is an almost perfect tool to protect and preserve natural and cultural resources while providing high quality recreation. Although Alternative 3 proposes less total acreage of wilderness than the PA, CWC recognizes that those “lost” lands will be protected as cultural/natural reserves instead and finds this acceptable.

9-12

In at least one place, Alternative 3 also proposes additional Wilderness not found in the PA. In the Tamarisk Grove Area, a gap between existing wilderness areas exist west of the campgrounds in the proposed Focused Use Zone 2. The PA proposes to manage this area as Backcountry Zone, while Alternative 3 proposes to manage this area as Wilderness. Because Wilderness already exists to the north, south, and west, a Wilderness designation would be more logical to protect natural resources and would prove more efficient in managing the areas.

Anza Borrego Desert State Park offers unusually simple access to wilderness areas by all visitors. People exploring the desert on foot, horseback, mountain bike, or vehicle can have a wilderness experience in many parts of the park by simply getting out of their car or off their horse or bike and walking away from the road. Nearly 100 miles of unpaved roads that border Wilderness or lie in a “corridor” between Wilderness areas provide such access. This level of access is more than sufficient for park visitors to experience the beauty and awe of Anza Borrego Desert, and should not be expanded.

9-13

With greater access to undeveloped natural lands, like Wilderness, CWC feels that it is absolutely necessary to restore disturbed areas to discourage continued trespass. Wilderness boundaries and open routes also must be clearly delineated on maps and on the ground (through signs, kiosks, etc.). Boundary delineation and restoration must be done

¹ It should be noted that the proposed Wilderness acreage is not consistent throughout the document and is reflected by the following figures: 55,797 acres (E.S. 2 and 3-15); 57,800 acres (4-3); 57,991 acres (Table 5-7). This should be corrected to reflect the accurate acreage.

#9-14 The proposed Cultural Resource Management Plan that would follow completion of the GP will conduct focused investigations of certain locations in the park for purposes of identifying potential new Cultural Preserves. Coyote Canyon is one such area of Anza-Borrego Desert State Park[®] where detailed future studies may result in proposals for designation of one or more new Cultural Preserves. The correct acreage is approximately 440 acres for the Cultural Preserve and the references you cited will be changed to reflect the correct amount of 440 acres. In the Preferred Alternative, the area near Tamarisk Grove would still be protected, although not with a “Natural/Cultural Preserve” status. The Preferred Alternative incorporates elements from Alternative 3 within the individual Goals and Guidelines that protect resources throughout the Park in all the management zones. For example, these elements include specific Guidelines for resource protection under Sections 3.3.1.1 Data Driven Management Decisions, 3.3.1.2, Physical Resources, 3.3.1.3, Biotic Resources, 3.3.1.4, Cultural Resources, 3.3.1.5, Interpretation, and 3.3.1.7, Visitor-use and Opportunities.

#9-15 CSP concurs – Please see Section 3.2.1. CSP concurs that ABDSP, has a more heightened standard for protection and preservation than other parts of the desert managed for multiple uses, and cannot be expected to allow uses that will degrade the natural and cultural environment.

9-13
(cont'd)

where existing and potential Wilderness areas border roads in the park and along the boundaries where park meets private or other agency lands, particularly Ocotillo Wells State Vehicular Recreation Area. The guidelines under Recreation Goal 2 cursorily mention these needs, but not to the degree of specificity that is necessary in preventing intrusions into Wilderness areas and restoring areas degraded by trespass. CWC would like to see these guidelines more prominently in the GMP, particularly given the great amount of Wilderness within Park boundaries.

Cultural/Natural Preserves

Wilderness goes far in permanently protecting our cultural and natural heritage, but some resources are of such a sensitive nature that additional protections are needed. Cultural and natural preserves provide for these additional protections by mandating that an area be managed to protect the complete integrity of the area. Under the PA, only one cultural preserve is proposed². Many of the areas proposed as preserves under Alternative 3 remain as Backcountry Zones under the PA, which would allow for the development of new roads and utility lines. These areas should, at the minimum, be designated as Wilderness Zones.

9-14

Alternative 3 would provide greater protection to places, like Coyote Canyon, with significant cultural and natural resources that are threatened by increased visitor use and incompatible recreational pursuits. CWC supports this level of protection and, if not approved within the General Plan process, encourages such designations in the Cultural and Natural Resources Management Plan processes. We are concerned, though, that in an area like Tamarisk Grove, management of a cultural or natural preserve may prove difficult because, as it is proposed in Alternative 3, it is sandwiched between a Focused Use Zone I area and a Focused Use Zone II area. More intensive uses of the land are allowed in these two zones than in a cultural/natural preserve, and thus, we would encourage the Park to consider re-zoning either one or both of the zones to the sides of the proposed preserve to be more consistent with management objectives of the preserve.

Recreation

9-15

In discussing recreation within State Parks, we must first start by laying out why an area has received the designation of Park and what that means. According to PRC §5019.53, a state park "consists of relatively spacious areas of outstanding scenic or natural character, oftentimes also containing significant historical, archaeological, ecological, geological, or other such values." As clearly laid out in the GMP, Anza Borrego Desert State Park consists of not one, but all of these. Because of these values, the State of California demands that management of the area be to preserve what makes the area outstanding. See PRC §5019.53. The Park, then, has more heightened standards for protection and preservation than other parts of the desert managed for multiple uses, and cannot be expected

² It should be noted that the proposed preserve's acreage is not consistent throughout the document: 428 acres in one section (3-17) and 2,600 acres in other sections (ES-2, 4-3 and Table 5-7). This should be corrected to reflect what we assume to be the accurate acreage of 2,600 acres.

#9-16 CSP agrees that different types of recreation cause differing effects on the level of visitor impacts to resources. It is also important to remember that the context and intensity of such impacts varies substantially with the characteristics of different sites and the number of users, not just the type of recreation.

#9-17 CSP agrees that access is provided to many remote regions throughout the Park. As new private lands are acquired, new access roads will be available to the public. Additionally, the Road and Trail Management Plans may change access within existing areas of the Park. Overall, trails and primitive roads are anticipated to increase but they may also be closed or rerouted to avoid sensitive resources. Please see Table 5.8. Additionally, mountain bikes are seasonally allowed along the entire Coyote Canyon trail.

#9-18 No new roads are currently planned or anticipated in existing and proposed State Wilderness. Primitive roadways are used as pathways of access for highway legal vehicles, equestrians, hikers, and mountain bikes. ABDSP possesses the largest State Wilderness areas in California. Although some roads might be attractive as routes in their own right, most are used as access ways into the remote backcountry of Anza-Borrego. As the General Plan is completed and approved, the Roads Management Plan will address the road system in more detail. Because the General Plan is a program level EIR and planning document, the specific details of the road system will be addressed under the public's scrutiny in the Roads Management Plan. Please also see Response #9-17.

to allow uses that will degrade the natural and cultural environment in unacceptable ways.

9-16
9-17

Visitors to the Park approach their enjoyment of it through different recreational pursuits. Some are more compatible with the protection and preservation of sensitive desert resources than others. Those that have a lesser impact are likely those that meet the definition of "high quality recreation," that which the Park aspires to provide. Park staff has experienced a fair amount of controversy over the appropriateness of vehicular access throughout the Park and it should be commended for its efforts to meet the public's contrasting visions for the park. Currently, 100 miles of paved public roads facilitate park access and 410 miles of unpaved roads exist throughout the Park for vehicular, equestrian, and mountain bike access. Equestrians also have almost 100 additional miles to explore on the Pacific Crest Trail, California Riding and Hiking Trail, and Lower Willows Bypass Trail. Mountain bikes can also access the Lower Willows Bypass Trail.

9-18

According to Public Resource Code §5019.53, "Improvements which do not directly enhance the public's enjoyment of the natural, scenic, cultural, or ecological values of the resource, which are attractions in themselves, or which are otherwise available to the public within a reasonable distance outside the park, shall not be undertaken within state parks." Although not all would agree, roads are improvements, and thus, their creation and maintenance fall under the purview of this code. Roads may enhance enjoyment of Park resources for some by providing easier access to farther-reaching areas, but they also degrade others' enjoyment of the same resources by diminishing their wilderness experience. Roads are attractions themselves. Clearly, a rising number of off-road users are getting involved in land management planning processes to ensure roads, paths, and trails throughout the desert exist for their enjoyment. The roads themselves are what attract those users to an area. Various off-road opportunities including dirt roads, trails, and open areas exist outside of park, including the adjacent Ocotillo Wells State Vehicular Area. Given that roads do not always directly enhance the enjoyment of Park resources, they themselves are an attraction, and various opportunities to ride on roads, trails, or in open areas exist within a reasonable distance outside of park boundaries, the Park need not undertake the construction of new roads or undertake to maintain all that currently exist.

The General Plan reflects this understanding of PRC §5019.53. Under the PA, no existing roads will be closed, and no new roads will be created. Although not stated, it seems safe to assume that under Alternative 3, some roads would need to be closed to be consistent with management parameters for cultural/natural preserves. Either alternative will be consistent with the aforementioned section. Given the definition of high quality recreation, however, approval of Alternative 3 would be more logical because closing some roads in sensitive areas would prove more successful in preserving valued natural and cultural resources.

California State Parks Response

#9-19 CSP concurs with your comment with the exception that a cultural preserve is proposed in both Alternative 1 & 2.

#9-20 Thank you for the clarification and additional information on RS 2477. Please also see Responses #6-10, 6-11, and 6-12.

Alternatives 1 and 2

9-19

CWC opposes Alternatives 1 and 2, as both alternatives would sacrifice too much of the Park's valuable resources by concentrating visitor use in larger, more developed areas than those in the PA or Alternative 3. They also allow for more development of facilities, roads, and utility corridors. These alternatives also do not offer the heightened protection of sensitive resources through the increases of wilderness and cultural/natural preserve designation that the PA and Alternative 3 offer. Neither alternative proposes cultural/natural preserves. Alternative 1 proposes no increase in wilderness. Alternative 2 proposes just over 1,000 acres of new wilderness. These alternatives fail to meet the Park's purpose, mission, and vision, and the mandates in the California State Parks' Mission and Public Resources Code State Park classification, PRC §5109.53, because they could not meet the main goal of preserving and protecting the Park's natural and cultural resources while providing high quality recreation. Instead, these alternatives would force recreation and preservation to become at odds.

RS 2477

9-20

Because various commenters raised the issue of RS 2477 with the first release of the General Plan, CWC feels the need to address it here. Revised Statute (RS) 2477, a provision of the 1866 Lode Mining Act, is a widely misunderstood law that congress repealed 28 years ago. Intended to facilitate development of the West, the concise statute reads, "The right-of-way for the construction of highways over public lands, not reserved for other uses, is hereby granted." RS 2477 was repealed in 1976 with the passage of the Federal Land Policy and Management Act (FLPMA). FLPMA required applications and a permitting procedure for granting rights-of-way over public lands, but "grand-fathered" rights-of-way constructed under RS 2477 between 1866 and 1976. In order to qualify as a "grand-fathered" RS 2477 right-of-way, a public highway must have been built between 1866 and 1976, and the road constructed must have run over federal public lands that were, at the time of construction, not reserved for any other purpose. These are specific and clear criteria. Historic use alone does not qualify a route as an RS 2477 right-of-way.

A federal district court in Utah issued a ruling earlier this year that upheld the Bureau of Land Management's standard for validating RS 2477 right-of-ways on federal public lands. Southern Utah Wilderness Alliance v. Bureau of Land Management, Civ. No. 96-CV-836 TC (D. Utah, 2004). The standard upheld by the district court stipulated that a route must have been constructed (not simply created by repeated use) for some public purpose, in addition to having been constructed between 1866 and 1976 on unreserved federal public land. Under Judge Campbell's ruling, routes created for a private purpose like mining or access to private property are *not* RS 2477 rights-of-way. Routes originally constructed over private lands are *not* RS 2477 rights-of-way. Despite the complaints of off-road vehicle groups, Anza-Borrego State Park is within its right in regulating use of the roads and trails within the park, including Coyote Canyon. Moreover, it is not the responsibility of Anza-Borrego State Park or the California Department of Parks and Recreation to inventory, identify, validate, or in anyway acknowledge RS 2477 claims.

California State Parks Response

#9-21 Please see Response #9-1.

9-21

Conclusion

CWC supports either the Preferred Alternative (PA) or Alternative 3 (the Environmentally Superior Alternative) with encouragement that the Cultural Resources and Natural Resources Management Plans be prepared immediately following approval of the GMP to provide a baseline for other management plans. We applaud Park Management for its efforts in creating a GMP that incorporates years of study and a great deal of public input on how to balance the needs of its visitors with protection of the environment. We look forward to reviewing each specific management plan as they are developed. Thank you for your serious consideration of our comments and please feel free to contact me if you have any questions.

Sincerely,

Bryn Jones
Desert Program Director
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bjones@calwild.org

#10-1 Thank you for your support.

#10-2 Tamarisk removal is somewhat controversial due to its staff and funding requirements but the coordinated tamarisk removal efforts at ABDSP are successful as implemented so far.

#10-3 Please see Responses #6-12, #9-17, and #9-18.



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Sept. 13, 2004

- 10-1 The ABDSP General Management Plan will serve as the vision of the future, and help the public see the direction the ABDSP will be going.
- 10-2 The Sierra Club, San Diego Chapter, Desert Committee supports the Preferred alternative, with the preservation of the wilderness, and wild areas in ABDSP.
- 10-2 We support the use of mechanical and chemical means to eliminate tamarisk from ABDSP, and a high priority should be given to improving the wetlands/riparian areas with the removal of tamarisk.
- 10-3 There are an adequate number of roads for ORV use in the ABDSP, and no new roads should be built. The biological and cultural resources in Coyote Canyon should be protected and no new roads built in or through the canyon. There is currently several ways to access Coyote Canyon, and any additions to the roads would have a negative impact on the area.

Thank you,

Larry Klaasen
Sierra Club, San Diego Chapter, Desert Committee
3820 Ray St.
San Diego CA 92104



#11-1 California State Parks (CSP) recognizes that open camping at ABDSP is a unique and valuable recreational experience to a variety of user groups. That is why it is available in the Backcountry and Wilderness Zones.

#11-2 Thank you for your support.

#11-3 CSP agrees that management plans and detailed site-specific plans are needed to understand the potential for environmental impacts at a detailed level. However, CSP respectfully disagrees that the “true impacts” of the General Plan cannot be addressed at the program level. Park-wide issues and management concepts must be dealt with at the program level to ensure consistency and the protection of park resources. Subsequent planning efforts must comply with the General Plan and will be subject to full CEQA compliance.

#11-4 Thank you for your support. It is the goal of CSP to protect the Park’s resources while providing high quality recreation to the public.

#11-5 Some of the most popular wild flower viewing areas are located in Borrego Springs, outside of the Park boundaries. The Area-Specific Goals and Guidelines were developed for specific geographic sites with the park that warrant special management goals for a number of reasons, including sensitive resources and/or recent acquisition. Throughout the General Plan Goals and Guidelines, there are references to protection of the Park’s resources. For example, please note the Goals – Community 3, Interpretation 1, Cultural Resources 3, Link 1, Bio Processes 1, Biota 1, Hydrology 1, Soils 1, Geology 1, and Data 1.

#11-6 CSP welcomes input from the California Native Plant Society in preserving areas portrayed in California’s Wild Gardens, including the Lucky 5 Ranch. Please see Response #9-1.

California Native Plant Society

San Diego Chapter P.O. Box 121390 San Diego, CA 92112

Tina Robinson
Southern Service Center
CA Department of Parks and Recreation
8885 Rio San Diego Drive, Suite 270
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September 13, 2004

Re: Anza-Borrego Desert Park General Management Plan

Dear Ms. Robinson:

11-1 The San Diego Chapter of the California Native Plant Society has reviewed the draft
11-2 Environmental Impact Report for the Preliminary General Plan for Anza-Borrego Desert
11-3 State Park. Members of our Society from a variety of chapters enjoy the natural, cultural,
geologic, and the dark sky resources of Anza-Borrego State Park. The open camping
concept is a State resource of significant value to the citizens of the state and visitors
from around the world. Our organization has been contacted in the past by out of state
visitors hoping to obtain information on botanical resources within Anza-Borrego Desert
State Park. This General Plan appears to balance the needs of people with the protection
of the environment and we support the preferred alternative. Until more detailed
management plans described in section 3.4 are developed, our comments are limited. It
will be the more detailed plans that lay out the management requirements for various
locations such as the Lucky 5 Ranch area and sensitive resources throughout the park. It
has been our experience that the detailed plans are needed to understand the true impacts
of a general plan.

11-4 The Preliminary General Plan clearly lays out the guiding language used to arrive at the
preferred alternative. There has been a balancing of recreation desires with the
requirement for cultural and natural resource protection within a State Park. It is clear
that a great deal of study and public input has been involved in the plan.

11-5 Large numbers of people come to the park to enjoy the spectacular wildflower displays.
Section 3.3.1.7 discusses this aspect of use of the park and the potential for loving to
death fragile desert flowers yet we could find no “Area-Specific Goals and Guidelines” in
Section 3.3.2 that involves some of the more frequently visited wildflower display areas.
Will the Natural Resources Management Plan address this issue? The wildflower display
areas do not necessarily overlap with sensitive resources. It is not clear how
determination of carrying capacity and dispersal of visitor use will be approached.

11-6 The Lucky 5 Ranch area is another area rich in wildflower resources although in this case
mountain wildflower species are involved. Again the species are not necessarily sensitive
yet the profusion of flowers is a sight rarely seen in our county. It isn't clear from the
goals listed in 3.3.2.4 that the wildflower areas portrayed in California's Wild Gardens



Dedicated to the preservation of California native flora

#11-7 Tamarisk removal is constrained by staff and funding requirements but the coordinated tamarisk removal efforts at ABDSP are successful as implemented so far. The Park staff continues to eradicate exotic species, such as tamarisk, invasive grass, and Brassica, in the most effective manner possible and seeks volunteer assistance as well. Tamarisk and other exotics are removed in the upstream sections of given drainages first.

11-6
(cont'd)

will be preserved. Prompt completion of the Natural Resource Management Plan would be appreciated.

11-7

Park staff has done a laudable job at tamarisk removal in the park yet large amounts of the species continue to expand in the southern part of the park. Is the State actively pursuing the use of biocontrols for tamarisk control in Anza-Borrego Desert State Park? How will invasive grass and Brassica be dealt with?

Thank you for your attention to these details. Should you have any questions, please do not hesitate to contact me at cindyburrascano@cox.net or (858) 558-2191 x203.

Sincerely,



Cindy Burrascano
SD Chapter Conservation Chair

#12-1 California State Parks (CSP) thanks you for your support.

#12-2 CSP agrees that the purpose of ABDSP (Section 3.2.3.1) is to preserve not only the natural resources but the cultural and scenic resources while providing opportunities for high quality recreation that support a healthy natural environment.

#12-3 The figure of 55,797 acres is correct. Section 4.1 will be changed to 55,797 acres.

#12-4 On-site facilities would allow for concessions with neighboring communities (helping to fiscally support them), while encouraging consistency of park interpretive themes & overall mission. Depending on the type of concession and service it provides, facilities may better serve the public either on or off site. Each concession proposal would need to be evaluated prior to approval before determining whether or not on-site facilities were appropriate. In regard to Section 4.1, the statement simply addresses a cumulative issue that may occur if Alternative 3 were implemented. If recreational activities were reduced substantially in ABDSP, it is likely that the demand for similar activities would be increased outside Park boundaries in a spillover effect. Such spillover would potentially impact resources on other lands.



SAN DIEGO AUDUBON SOCIETY

4891 Pacific Highway, Suite 112 • San Diego, CA 92110 • 619/682-7200 • Fax 619/682-7212

Statement of the San Diego Audubon Society
to the California State Park and Recreation Commission
concerning the

Anza-Borrego Desert State Park General Plan

August 3, 2004

Dear Commissioners:

12-1 | The San Diego Audubon Society, representing over three thousand local members, endorses the Preferred Plan option for the draft General Plan for Anza-Borrego Desert State Park as presented by the Department of Parks and Recreation, with the following comments.

12-2 | We urge that the main management goal of the park be specifically stated as the protection of desert ecosystems. Non-destructive, non-disruptive forms of recreation are acceptable as long as they are compatible with this primary goal, as specified in the Park's Declaration of Purpose (section 4.4.2).

12-3 | We endorse the new wilderness area additions that are indicated in the draft Preferred Plan; we concur that this is the best means to help preserve the Park's unique resources. We are uncertain, however, why the Executive Summary (p. 6) states that there will be 55,797 acres of new wilderness, whereas the figure in Section 4.1 (p. 207) is given as 57,800 acres?

12-4 | We urge that any privately operated commercial facilities that are deemed necessary to support Park visitors be located outside the boundaries of the Park. All such facilities can easily be located in the communities of Borrego Springs, Ocotilla Wells, Jacumba, Ocotilla, Ranchita, and Shelter Valley, who would welcome the business. We do not feel that there is a need for such facilities to be permitted within park boundaries. In this context, we are puzzled by the new wording that has been inserted into the last sentence of section 4.1, which seems to be saying that adverse environmental impacts from recreation activities outside the Park are more undesirable than having such impacts occur inside the Park?

#12-5 Designating the area as such, allows for existing uses (i.e. visitor center, campground, etc.), while enabling future building for research and educational facilities; localizing development to areas with diminished impacts. Designation of a larger area does not necessarily mean that the entire area would have facilities, only that facilities could occur anywhere within that area. The Headquarters area is central to the Park and requires greater flexibility in its planning. Site planning within this area will also be designed with environmental constraints and resource protection per the General Plan Goals and Guidelines.

#12-6 Although access in Coyote Canyon will be decided during planning for the Management Plans, it is not anticipated that the Middle Willows portion of Coyote Canyon would be reopened to motorized vehicles, nor that the Lower Willows Bypass or northern section of Coyote Canyon would be closed to motor vehicles.

#12-7 The Park has been working with the community of Borrego Springs for a number of years to address the problem of water overdraft by agriculture and golf courses. That partnership will continue.

#12-8 Actually, the park staff has been conducting biological surveys on the ranch property for years, with permission of the former owner. These surveys led to CSP setting the property as a number 1 acquisition priority. Critical habitat for the Endangered Peninsular bighorn sheep and valuable nesting habitat for as many as 51 pairs of least Bell's vireo have been documented on the property. Both will be managed for as top priorities. Restoration of bighorn, absent from Vallecito Ranch for decades, is a prime goal of CSP and CA Dept. of Fish & Game. "Habitat altering uses" will not occur in all lands designated as "Backcountry." Backcountry is the same status as State Park designation, hardly a give-away status.

#12-9 A new airport will not be constructed. The Vallecito Ranch had an existing airport runway and two hangers. The site may be important as a secondary landing site for the Park airplane and for search and rescue operations since the site is located at some distance from the other landing sites.

#12-10 Thank you for your support.

Comment Letter 12 – San Diego Audubon Society

12-5 In a similar vein, we wonder why the entire Headquarters – Borrego Palm Canyon area needs to be designated FUZ-I, the most permissive development category? We oppose this. Surely most of the several hundred acres here could be designated FUZ-II, or even designated as backcountry.

12-6 We reiterate our strong opposition to any road of any type going through Coyote Canyon. Our opposition here is in the interests of preserving Big Horn sheep access to water sources. We regret that a circulation element is not yet prepared; we hope that when completed it will show only non-motorized trails through Coyote Canyon.

12-7 We remain concerned about the present overdraft of groundwater in the Borrego Valley. While not being caused by the Park, the Park is likely to be adversely affected by this situation. We call on the Commission to communicate with the San Diego County Board of Supervisors urging them to adopt a land use plan for Borrego Springs that will sharply cut back on water use in the valley, and in the process protect groundwater-dependent resources in adjacent areas of the Park.

12-8 Within the new Vallecitos Ranch acquisition, we urge that a biological survey be carried out to identify significant habitat areas, and that such areas be removed from the Backcountry category and given a higher protected status. Designating all of the Ranch to habitat-altering uses seems inappropriate.

12-9 We strongly oppose any provisions for placing a new airport and support structures within the Park, as seems to be suggested in Table 5.8, in FUZ-I. There are already at least two paved airstrips within the Park's outer boundaries; why are any more needed?

12-10 We appreciate the diligent work of staff in preparing a balanced plan that takes into account the interests of all user groups, while maintaining the primary goal of natural resource protection. We urge the commission to adopt a General Plan for Anza-Borrego Desert State Park that incorporates the above considerations.

Thank you for the opportunity to comment on this important planning process.

For the San Diego Audubon Society,



Philip R. Pryde

Conservation Committee desert specialist, and Member, Board of Directors

#13-1 The District under which Anza-Borrego Desert State Park[®] (ABDSP) is administered has one permanent staff archaeologist and three other archaeologists hired by contract. In addition, the park has a successful volunteer program called the Colorado Desert Archaeology Society who compliment the work of professional archaeologists by assisting with cultural studies and site monitoring in the park. Members of the Colorado Desert Archaeology Society are given training on archaeological field and lab techniques. The park also has an active archaeological site steward program that currently consists of 26 individuals, all of whom have been extensively trained. The site stewards are now regularly visiting areas of the park chosen by the District Archaeologist to monitor the condition of archaeological sites therein.

#13-2 California State Parks (CSP) recognizes that the Cultural Preserve designation affords a higher level of protection for archaeological sites and other cultural properties, in particular, by precluding camping and roads and trails. However, it is also the opinion of CSP that a wilderness designation and focus-use designation provide good protection for historical resources in the park, while permitting quality recreational opportunities. CSP also felt it would be prudent to study specific areas in the park with known high cultural sensitivity in greater detail during a subsequent management plan process, i.e., management plans will be subsequent to approval of the General Plan. Many of the park areas you cited in your letter of 8/29/04, e.g., Coyote Canyon, Hapaha Flat, Indian Hill, Piedras Grandes, and others, would be the subject of a focused cultural resource management plan. The results of these more focused studies may result in proposals to designate additional Cultural Preserves within the park.



San Diego County Archaeological Society, Inc.

Environmental Review Committee

29 July 2004

To: Environmental Coordinator
 Southern Service Center
 California Department of Parks and Recreation
 8885 Rio San Diego Drive, Suite 270
 San Diego, California 92108

Subject: Draft Environmental Impact Report
 Anza-Borrego Desert State Park Preliminary General Plan

Dear Sir or Madam::

13-1 | The San Diego County Archaeological Society (the Society) is a non-profit educational organization that has been in operation for over 30 years. Our members are both historic preservation professionals and local citizens with an avocational interest in regional history and prehistory. Members of the Society recognize that Anza-Borrego Desert State Park possesses extraordinary cultural, natural, recreational, and scenic values for this region. The Society strongly urges California State Parks to continually protect and maintain these values with sufficient staffing, funding, and administrative support.

13-2 | The current General Plan recommends only one new Cultural Preserve for Anza-Borrego Desert State Park. It is the position of the Society that one Cultural Preserve is insufficient and short-sighted, given the vastness of the park and the large numbers of significant archaeological sites therein. It is common knowledge in the region that places within the park such as, Blair Valley, Clark Dry Lake area, Coyote Canyon, Harper Flat, Hapaha Flat, Indian Hill, Indian Canyon, Lower Borrego Valley, Mountain Palm Springs, Piedras Grandes, Rockhouse Canyon, and others, possess large numbers of sensitive and highly significant archaeological sites, historic properties, and traditional cultural places. The park general plan and staff of California State Parks must recognize those places as holding unique and significant cultural values, and offer an effective land management policy to appropriately protect these places in public trust. Use of the Cultural Preserve sub-unit classification and, perhaps, other protective measures, are warranted for such sites as the ethnographic villages and gathering areas in Coyote Canyon, the ethnographic village and cemetery in Hapaha Flat, the powerful and sacred rock art sites in lower Blair Valley, Indian Hill, Piedras Grandes, Clark Lake area, etc., the innumerable occupation sites throughout the park, the gathering areas and unique cultural features found in Harper Flat, the World War II era sites in the park, and others.

13-3 | The Society is also concerned about the existing “open camping” policy of Anza-Borrego Desert State Park. Such a policy does not allow for appropriate protection of sensitive cultural and

#13-3 ABDSP is unique within the California State Park System in being able to provide a wilderness experience and permit camping and other recreational activities in vast areas of the park. Visitor surveys, letters, and comments during public hearings for the General Plan demonstrate the open camping policy is very popular with the visiting public. It is the intention of CSP, as specified in the General Plan, to initiate planning efforts that study the current camping policy in close detail and the current level of protection provided to historical resources. These proposed management plans will follow approval of the General Plan and offer a means to carefully examine recreational uses in the parks and the condition of archaeological sites and other cultural properties within recreation areas. These management plans will then lead to the formulation of specific measures to treat resource problems and identify means to enhance the visitor experience while protecting resources. The closure of certain areas to camping and the designation of cultural and natural preserves are some of the management measures that could result from investigations conducted during the future management plans. Thank you for your continuing interest in the management of historical resources within ABDSP.

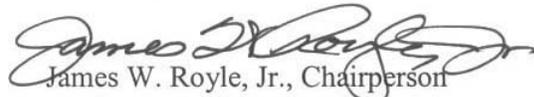
Comment Letter 13 – San Diego County Archaeological Society

13-3
(cont.)

natural resources for which the park is famous and for which the public loves the park. The result of the open camping policy is ongoing degradation of highly significant archaeological sites, geologic features, historic building remains, vegetation, and wildlife habitat. Given the vastness of the park, it is the position of the Society that closing a relatively small number of locations to open camping does not represent a hardship on the visiting public. We assume park staff is well aware of areas in need of protection from uncontrolled camping. Areas of the park, such as, Lower Willows, Middle Willows, Upper Willows, Grapevine Canyon, Hapaha Flat, Indian Canyon, Indian Hill, Lower Borrego Valley, Mountain Palm Springs, Piedras Grandes, and others, are excellent examples of places where open camping has resulted in continuing degradation to cultural sites, unauthorized collection of cultural remains, damage to vegetation, and a diminution of scenery and natural aesthetics. We strongly recommend that California State Parks review the open camping policy in Anza-Borrego Desert Park, and seek modifications to the policy to further the Department's stated goals of stewardship and resource preservation.

Thank you for the opportunity to comment upon management policies of this important State Park. The Society looks forward to receiving a reply to our comments.

Sincerely,



James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: SDCAS President
File

#14-1 California State Parks (CSP) welcomes the support of community organizations such as Save Our Heritage Organization and your letter of concern for the cultural resources of Anza-Borrego Desert State Park[®] (ABDSP). CSP believes that the Mission of the California State Park System and the purposes for which ABDSP was founded provide a strong foundation of preservation and protection for the archaeological sites and historic properties in the park. CSP also feels the protection measures outlined in the Goals and Guidelines section and the proposed future planning efforts demonstrate that cultural resources will receive appropriate treatment and protection as a result of the General Plan.

#14-2 See Response #13-2.



Save Our Heritage Organisation

2476 San Diego Avenue • San Diego CA 92110 • 619/297-9327 • www.sohosandiego.org



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Bruce Coons,
Executive Director

August 11, 2004

Environmental Coordinator
Southern Service Center
California Department of Parks and Recreation
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

RE: RESPONSE TO THE JULY 2004 EDITION OF THE ANZA-BORREGO DESERT STATE PARK PRELIMINARY GENERAL PLAN & DRAFT ENVIRONMENTAL IMPACT REPORT

14-1

Save Our Heritage Organisation (SOHO) is sending this letter of comment on the General Plan for Anza-Borrego Desert State Park because of our concern over 1) a lack of new Cultural Preserves and 2) open camping and hiking in the park, resulting in an overall lack of protection for historic resources within the park. There are over 4,000 known historic and prehistoric cultural resources within Anza-Borrego Desert State Park. These resources include rock art, sleeping circles, midden sites, historic features and structures, and sensitive ceremonial areas. Although their presence within the State Park provides a level of protection, these unique, sensitive resources receive no special protection in the General Plan Team's recommendations.

14-2

The current General Plan recommends only one new Cultural Preserve for Anza-Borrego Desert State Park. It is the position of SOHO that one Cultural Preserve is insufficient to preserve the unique and highly significant cultural resources present in the park. We also believe it to be short-sighted, given the vastness of the park and the large numbers of significant archaeological sites therein. Places within the park such as Blair Valley, Clark Dry Lake area, Coyote Canyon, Harper Flat, Hapaha Flat, Indian Hill, Indian Canyon, Lower Borrego Valley, Mountain Palm Springs, Piedras Grandes, Rockhouse Canyon, Campbell Ranch, Tulloch Ranch, and others, possess many sensitive and highly significant archaeological sites, historic properties, and traditional cultural places.

#14-3 CSP believes that a Wilderness designation, the goals & guidelines contained in the General Plan, and other CSP regulations provide good protection for archaeological sites and historic properties in the Park. The General Plan specifies that future planning efforts in the form of various Management Plans will be conducted within the Park upon approval of the General Plan. A Cultural Resources Management Plan and a Camping Management Plan, for example, will be excellent platforms by which CSP can carefully investigate visitor-use patterns at areas with sensitive cultural resources (such as those you cited in your 8/11/04 letter). Work on the latter Management Plans can then serve as a means to propose effective site-protection measures, including the potential for creating new Cultural Preserves.

#14-4 The Department's *Resource Management Directives* and the *California State Parks Cultural Resources Management Handbook* direct State Parks staff to consult with local Native Americans about parks projects and seek their advice on land management decisions. CSP has a policy to assist local Native Americans in maintaining their traditional cultural practices, for example, by allowing the gathering of plant materials within park lands.

#14-5 Archaeological site surveys have been conducted by CSP with assistance from trained park volunteers within the newly acquired Campbell Ranch parcel. In addition, Colorado Desert District contracted with a local cultural resources consulting firm to perform a focused investigation of historic ranching sites and features on the Campbell Ranch parcel. A local Kwaaymii elder, has provided information about the lands within and adjacent to Campbell Ranch. The Focused-Use Zones proposed for the Campbell Ranch parcel in the Preferred Alternative are situated upon an area where mid- to late-twentieth century ranch features are already located. You are correct, however, that areas important to local Native American, in particular, the Kwaaymii, are located within this new parcel. CSP is aware of the locations of these traditional cultural places. Currently, there is no public access to this new parcel.

The Tulloch Ranch parcel is not addressed by the current General Plan document, as its purchase had not been approved prior to preparation of the document for recirculation. It is our understanding some archaeological site surveys have already been conducted within the Tulloch Parcel. No proposals for use of the Tulloch parcel will be determined by California State Parks until thorough environmental reviews are conducted there, including archaeological studies and biological studies. Section 3.3.1.10 addresses new acquisitions in the General Plan.

#14-6 See Response #13-3.

- 14-3 It is critical that the staff of California State Parks recognize those places as holding unique and significant cultural values; these locations require appropriate management policies to protect them in public trust. Use of the Cultural Preserve sub-unit classification and implementation of other more restrictive measures are mandatory actions for such sites as the ethnographic villages and gathering areas in Coyote Canyon; the ethnographic village and cemetery in Hapaha Flat; the powerful and sacred rock art sites in lower Blair Valley, Indian Hill, Piedras Grandes, Clark Lake area, and in many other locations; the gathering areas and unique cultural features found in Harper Flat; the World War II era sites in the park; the traditional trails, sites, and gathering areas in the newly-acquired Campbell Ranch; the unique mountain village complexes in the Lucky 5 and Tulloch Ranch areas, also newly-acquired; and the innumerable occupation sites throughout the park. In addition, consultation with Native Americans to identify sacred lands and traditional cultural areas is critical for the protection of these resources. Anza-Borrego Desert State Park provides Native Americans with the opportunity to maintain traditional cultural practices.
- 14-4
- 14-5 We are particularly concerned that the new acquisitions, including Tulloch Ranch and Campbell Ranch, will not be properly inventoried for prehistoric and historic cultural resources before they are opened for public use. Consultation with Native Americans is also an essential element of cultural resource management. Both of these areas contain traditional gathering areas, Native American trails, and traditional cultural properties held sacred by local native people. Unrestricted camping, horse camping, and off-road vehicle activity have an enormous adverse impact on sensitive cultural resources, and these should not be permitted in traditional cultural locations. These ranches also contain features related to our ranching history. These should be inventoried and protected before any public access is permitted.
- 14-6 SOHO is also concerned about the existing “open camping” policy of Anza-Borrego Desert State Park. This policy does not allow for appropriate protection of sensitive cultural and natural resources. The pristine, natural and cultural values of the park are its greatest appeal to the public at large; imagine how contradictory it seems for activities to be allowed that will destroy the greatest assets of the park. The result of the open camping policy is ongoing degradation of highly significant archaeological sites, traditional cultural locations, sacred sites, geologic features, historic building remains, vegetation, and wildlife habitat. Given the vastness of the park, it is the position of SOHO that eliminating open camping in a relatively small number of locations will not represent a hardship on the visiting public. We assume park staff is well aware of areas in need of protection from uncontrolled camping. Areas of the park such as Lower Willows, Middle Willows, Upper Willows, Grapevine Canyon, Hapaha Flat, Indian Canyon, Indian Hill, Lower Borrego Valley, Mountain Palm Springs, and Piedras Grandes are excellent examples of places where open camping has resulted in continuing degradation to cultural sites, unauthorized collection of cultural remains, damage to vegetation, and a reduction of scenic and aesthetic values.

California State Parks Response

#14-7 Please see Response #14-3. Open Camping is an extremely popular activity in ABDSP for visitors with varied interests. Future planning efforts will allow CSP to redirect open camping away from areas with high resource sensitivity without precluding the activity altogether.

14-7

We strongly request that California State Parks review the open camping policy in Anza-Borrego Desert Park. Modifications to the policy are mandatory to further the Department's stated goals of proper stewardship and protection of cultural resources.

Thank you for the opportunity to comment on the General Plan. SOHO anticipates a detailed reply to the comments in this letter.

Sincerely,



Bruce Coons
Executive Director