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Environmental Coordinator  
C/O Southern Service Center  
California Dept. of Parks & Recreation  
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Re: ABDSP Draft General Plan comments

Dear: Environmental Coordinator

On behalf of CORVA, our membership, the vast community of outdoor recreationists that we represent and myself as an individual, I am submitting these comments regarding the Draft for the ABDSP General Plan (GP).

*1.1.3 PURPOSE ACQUIRED*

*"...to make available to the people forever, for their inspiration, enlightenment and individual enjoyment, a spacious example of the plains, hills, and mountains of the Colorado Desert, embracing extensive zones of unimpaired natural integrity, and representing all the varied scenic, historic, scientific, and recreational resources of the region."*

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The above statement though noble in its intent to depict an unbiased and friendly management direction for this Park, in reality is not accurate. The current management of ABDSP has been incrementally excluding users and user groups from the Park. The community saw the need to hire the highly regarded Brooks Co. in 2001 to conduct a very comprehensive "Tourism Development and Marketing Plan for Borrego Springs". It was commonly called "What's the matter with Borrego Springs and how to fix it" This reports findings yielded numerous recommendations to ABDSP, it states, "During the research and interviews in developing this plan, we continually heard that Park personnel are doing everything they can to keep visitors, film crews and tours out of the Park - with the goal of preservation far outweighing the concept of sharing the Park - with visitors. We even got that feeling in speaking with various park employees".

*2.1.3.2 Federal Land*

*BUREAU OF LAND MANAGEMENT BLM*

*"Dedicated to protecting our lands for the people, not from the people."*

#129. A major function of any State Park General Plan is to state the existing park conditions and identify current issues. The purpose of stating these is to give the reader background information and reasons behind subsequent management actions prescribed in the General Plan. The Sections cited in your comment are accurate and reflect the current condition and/or issue at Anza-Borrego Desert State Park. Subsequent management actions prescribed in the “Plan Section” of the General Plan are intended to address these issues.

CSP has written a General Plan that, among other goals, fulfills the Mission of the Department and park purpose. The Department’s Mission and the Park’s purpose provide a balance between recreational opportunities and protection of resources (see “Department Mission” Section 3.2.1 and “Declaration of Purpose” Section 3.2.3.1). The Anza-Borrego Desert State Park General Plan indeed provides this balance. Please note the following examples of Goals and Guidelines (found in such Sections as 3.3.1.7), that provide for recreational use of Anza-Borrego Desert State Park. a) “Develop new visitor-use facilities to accommodate changing visitor uses, population demographics, and increases in visitation.” b) “Provide trails and roads that offer the opportunity for diverse visitor experiences while not compromising the integrity of park resources”, and c) “Ensure that appropriate recreational opportunities are available for people of all abilities, including seniors, children, and people with disabilities.”

*Although the BLM protects land for conservation and public use, this agency also allows for potentially impactful uses such as hunting, off trail equestrian activity.....*

#### *U.S. FOREST SERVICE*

*Hunting and off-highway use on U.S. Forest Service Land may have negative effects that cross from USFS land to ABDSP.*

#### *2.1.3.4 Other State-Owned land*

#### *CALIFORNIA DEPT. of FISH & GAME (CDFG)*

*The CDFG lands adjacent to the Park provide hunting opportunities that may have a negative effects on some animal and plant populations of ABDSP.*

#### *AGRICULTURE*

*Over consumption of water and deletion of the regional aquifers may eliminate much of the surface and subsurface water that supports the majority of the deserts biota.*

#### 129 *MINING*

*U.S. Gypsum Mine: This mine is a major source of dust and noise pollution.*

*Kennecott Mine: If developed as an open pit mine with cyanide processing heaps, this mine has the potential to become a significant pollution source and visual intrusion on the desert scene. Many small gold mining opportunities are still active southeast of Julian. These activities may have a negative effect on water quality, slope stability, and habitats of ABDSP*

#### *2.1.3.6 International Land*

#### *MEXICO*

*ABDSP is a major route for illegal immigration. The constant activity of illegal immigrants and Border Patrol vehicles is having a major negative effect on the natural resources of the park, especially the south end of the Park.*

#### *2.1.3.7 Transportation Corridors*

#### *AUTO*

*While the existing road system is critically important in providing vehicular access throughout the park, there can be negative effects to the park itself. Bighorn Sheep get run over by vehicle traffic and the roads inhibit the sheep's migration. People throw trash, littering the landscape. Traffic volume effects desert solitude and roadways slice across the natural scene with an artificial intrusion.*

#130. Please see Responses #44 and #12. Thank you for bringing forward the fact that CCC crews did work on a section of road through Coyote Canyon. A January 25, 1956 ranger patrol report confirms this fact. However, it only describes it as “an old C.C.C. road” running south off a rocky ridge at the northern end of Coyote Canyon from Terwilliger Valley into Coyote Canyon leading to Baily’s Cabin. It is the opinion of the project historian and archaeologist that it is not the most representative work of the CCC in the Park, and has lost much of its integrity. There are better examples of the CCC’s legacy in Box Canyon or at Borrego Palm Springs Canyon campgrounds.

*RAIL*

*Metropolitan Transit Development Board*

*The railroad includes tunnels and bridges that have fallen into disrepair and therefore, could be a safety hazard. Since it is currently non-active,, the railroad corridor has an uncertain impact to the Park; however; if put into use, it may have significant impacts to the Park's resources.*

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The preceding language reflects the current management direction of ABDSP. The public knows it, the local business community know it and the professionals at the Brooks Company discovered it. The Preservation mentality runs so deep in the management of ABDSP, it is now an unbalanced park. As long as the management of this park is allowed to guide it by "If, May, Could or Potentially cause Negative Impacts or Effects to the Park, it will never be a balanced Park. This scare tactic language is used extensively throughout the Draft. May, could and potential language should never replace sound and peer reviewed science.

The impacts of nature such as the catastrophic 1993 storm that scoured and radically altered the landscape of the 100,000 acre Coyote Canyon portion of ABDSP isn't worth mentioning in this draft. This storm uprooted millions of tons of earth, soil and habitat that actually and factually caused severe impacts to numerous species and biota. This area has recovered. This is what nature has been doing for hundreds millions of years and will continue to do. Yet the continual trumpeting of the "Fragile Species" and the endless insinuation that mans presence could, may and/or potentially negatively impact the species has reached a level that is blatant and insulting.

*CIVILIAN CONSERVATION CORPS*

*The "Triple Cs" would work on a number of key federally funded public works construction and resource conservation projects throughout the park from 1933 to 1942.*

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Many types of projects are mentioned here including the automobile road through Sentenac Canyon and Yaqui Pass in 1932. Missing however is the thorny issue of Coyote Canyon Road. The CCC built the Coyote Canyon Trail into a road during the fall and winters of 1933 and 1934. I mentioned this fact to Historian Alex Bevil that I met at one of the ABDSP GP meetings. He was interested and wanted more info. I suggested that he further contact Historian Phil Brigandi who is referenced in the draft. Why was this fact has omitted? Coyote Canyon Road is a County road and a RS2477 Right-Of-Way that belongs to San Diego County. ABDSP has been in a continual quest to extinguish this road and continues to do so by seeking additional Wilderness surrounding this road in its Alternative 3 Plan.

On BLM/USA patent dated 6/24/1975 stated under exceptions and reservations,"That right-of-way for a road over the E1/2NE1/4 said section 36 and all appurtenances thereto, constructed by the United States through, over, or upon the lands herein described, an the right of the United States, its agents or employees, to maintain, operate, repair, or improve the same, so long as needed or used or by the United States."

*Principle Historic Period Themes*

#131. The General Plan provides for and encourages all visitor interests mentioned in your citation. Please refer to Table 6.6 “Management Zone Matrix” in the General Plan for a listing of some major recreational uses and their corresponding zones. In particular, please note “Camping”, “Equestrian Use”, “Motorized Vehicles”, “Mountain Bikes”, and “Hiking”. Other interests mentioned in your citation are associated with one or more of these “major” forms of recreation.

*Native American Contact With Euro-American Explorers and Settlers 1769-1900s*  
*Mexican Pioneers and Settlers 1821-1848*  
*Anglo-American Pioneers and Settlers 1827-1848*  
*Early Anglo-American Military Engagements 1847-1890*  
*Development of Early Transportation Linkages 1848-1940*  
*Prospectors, Homesteaders, Ranchers and Real Estate Developers 1872-1970*  
*Creation and Early Admin of ABDSP 1932-1942*  
*Modern War, the Space Race and Scientific Exploration 1941-1973*  
*Postwar ERA 1946-1966*

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I want to make a point as to impacts regarding Coyote Canyon. Starting in 1995 with the Public Use Plan (PUP), this huge area of the park has experienced less impact and use from man, than any other year, for literally, thousands of years. Native American sites and dwellings are still visible in the canyon. These early inhabitants, who were hunter/gathers impacted this area. History is clear that the Spanish, Mexicans, Anglo Settlers and the like impacted this area with ranching, farming and mining. This area has experienced considerable use by man. This era ended when the Bailey's granted over their remaining properties in the 60s & 70s. From there on, impacts were narrowed down to the recreation and those folks that used Coyote Canyon Rd. Recreation took a major hit when ABDSP used the PUP to sever the road to through traffic in 1995. This has caused a sharp decline in visitors to this area, where it now experiences less use and impacts than any other time prior to 1995 and back for literally thousands of years. Yet the current management of ABDSP continues the siren for more protection, more Wilderness and less visitation of man.

*2.2.6.1 The Visitor Experience*

*The Park Attracts a diversity of visitors. It attracts those interested in Wildflowers, birds, bighorn sheep, reptiles, amphibians, geology, paleontology, astronomy, history, Native Americans, ethnography and solitude.*

*The Parks also attracts people who are interested in driving on paved and primitive roads, walking, hiking, horseback riding, mountain biking, hang gliding and flying airplanes.*

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The very first meeting of round one in Borrego Springs of the public General Plan meetings clearly let the attendees witness what ABDSP envisioned as recreation. Clay Phillips who facilitated this first meeting said that recreation was a major part of ABDSP GP. The segment of this meeting with its slide show that described what recreation is, was devoid of driving on any roads, horseback riding, mountain biking, hang gliding and flying airplanes.

When Mr. Phillips was asked to define what recreation was at the end of the meeting, he mentioned that the slide show that displayed nature walks, hikes, interpretive talks etc. as depicted on the slide show, represented recreation. This mentality confirms the attitude of ABDSP as experienced by these recreational groups. Go somewhere else, we don't want you!

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*2.2.7.2 CURRENT VISITOR INFORMATION*

*An average of 600,000 people visit ABDSP each year, with annual attendance during the last ten*

#132. Please see Responses #86 and #88. The “Tourism Development & Marketing Plan for Borrego Springs, completed by Chandler, Brook, & Donahoe, Inc. (October 2001) discusses a negative relationship between Anza-Borrego Desert State Park staff and the local community. However, CSP is one of the top employers in Borrego Springs, providing jobs for many of the areas residents. These residents are consumers, homeowners and community members whose families participate in community activities. Park staff would rather live in a community with friends rather than foes and therefore, work hard to keep this relationship amicable. As stated in the Department’s Mission, the challenge is not only to allow for outdoor recreation, but also to preserve the state’s extraordinary biological diversity and protect it’s most precious natural and cultural resources. Because the Park staff is striving to meet diverse public needs and desires, not all of those needs and desires can be met in a way that satisfies all users.

#133. The “Wilderness Zone”, along with road corridors bisecting these wilderness areas, provide for comparable recreational opportunities as the “Backcountry Zone” (See Table 6.6 – “Management Zones Matrix”). For example, “Open camping,” “(horseback) riding on designated unpaved roads and trails,” “motorized vehicles allowed on designated roads (technically outside the designated Wilderness Zone),” “parking along primitive park roadways,” “mountain bikes allowed on designated roads and trails only,” and “off-trail hiking” is allowed in both the Wilderness Zone and Backcountry Zone. The Wilderness Zone, however, provides an additional level of protection to park resources that is commensurate with the importance of those resources to the Park (see PRC Section 5093.31 for a description of wilderness Areas).

years ranging from 424,000 to almost 900,000. Eighty five percent of the attendance occurs in a 6-month period between November and April. Almost half (279,000) visit the Visitor Center and Borrego Canyon. Attendance in outlying areas of the Park range from a high of 80,000 in Coyote Canyon to a low of 3,000 at the Horse Camp.

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These numbers seem incredibly inflated. The Park needs to substantiate where these numbers came from. Since Coyote Canyon is closed for 4-months of the year, this means that each month that it is open averages 10,000 visits per month or approximately 333 visits per day. The Brooks Report said, "Many local residents and businesses feel that Park staff would like to see fewer and fewer visitors - after all, that would mean less work and less 'destruction' of the Park. Just the thought of additional signage directing people to Palm Canyon or to the Visitors Center evokes fear of trampled areas and far too many people and the demise of the Bighorn Sheep." I'm sure that these inflated numbers that ABDSP uses to trumpet negative impacts to the Park is a source of concern and/or humor with the local residents. Where, when, how and what criteria was use to calculate these visitation numbers?

#### WILDERNESS

There are approximately 404,000 acres of land currently classified as State Wilderness within the Park. This accounts for approximately two-thirds of the Park. State Wilderness Areas are designated using the National Park Service wilderness model, where the handiwork of humans is virtually non-existent and natural processes prevail. Wilderness units are usually over 5,000 acres in extent. Paved roads, motorized vehicles, power lines, pipe lines, radio towers and buildings are not to be found within such wild areas.

Many miles of primitive roads traverse the Park at junctures between different Wilderness Areas, although motorized vehicles or powered equipment of any type are not allowed within the Wilderness itself. The road "corridors" between Wilderness Areas are managed as if they were "Backcountry", with camping allowed adjacent to roads and in locations where no damage will occur to native vegetation.

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According to the Brooks Report it states, "Current impressions and comments by park employees lead the general public and others to believe the attitude at the park is geared for more preservation than one of sharing this incredible asset. They should be provided with national Park training so they can better understand the balancing act between preservation and keeping the public asset available to visitors"

The Draft (in this section) mentions that the road corridors between Wilderness areas are managed as if they were "Backcountry", with camping allowed adjacent to roads. The Management Zone Matrix of Table 6.6 (located in the back of the Draft) describes the allowed uses of the "Back Country Zone" and clearly spells out more than an adequate levels of protection for each use, which the majority of those that attended the eight public general plan meetings embraced.

The Preferred alternative is highly restrictive Wilderness. The majority of the participants who attended the eight General Plan meetings were in opposition.

Alternative 2 as described on page 4-8 completely twists the definition of Backcountry Zone as defined in the Matrix and tweaks it into a destructive Alternative thereby giving it a poison pill

#134. Please see Responses #12 and #37.10. CSP acknowledges that CORVA disputes the closure of the Coyote Canyon road to vehicular traffic. However, the General Plan is not designed to resolve those disputes but to provide guidance for future use and development of the Park.

#135. CSP has not chosen Alternative 3 as the Preferred Alternative. Please see Figures 7.6 and 7.9.

#136. At Anza-Borrego Desert State Park, the “shared-use” areas referred to are most often unpaved roads and trails. For example, unpaved roads are shared by licensed motor vehicles, equestrians, hikers, and mountain bikers. Trails are shared by the same except for motor vehicles. These shared uses occur regardless of wilderness area or state park designation. As noted in Response #146, access for all “major” forms of recreation is provided for and encouraged in both designations.

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and destroying it in biased favor of its Preferred Alternative 3 that creates more unnecessary Wilderness, that it clearly states is harmful to several forms of recreation. This Park has enough Wilderness already, it doesn't need the additional layers of protection and preservation. What it has is more than adequate and many feel is already excessive.

### 2.3 PLANNING INFLUENCES

*The Coyote Canyon Public Use Plan was prepared in 1995. This document (and the results of five years of monitoring) shaped the decisions of the Plan Section as it relates to this portion of the Park.*

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During the GP planning process, the Coyote Canyon PUP was a major topic in which the public repeatedly asked the Park staff which included Dave Van Cleve, Matt Fuzie and Mark Jorgensen when it was being released. Near the end of the process, Park staff told the public that the Coyote Canyon PUP and its monitoring was finally complete and it would be available to the public in the spring of 2002. Absolutely no one in the public received any notification of its release or even that it was finished. The public did not become aware of it being finished until reading in this Draft that Parks has used the PUP to shape the Draft.

This is a complete breach of trust and further erodes this Parks credibility with the public. It has displayed once again a less than ethical and honest relationship with the public. CORVA has an on going dispute with Park that the PUP is illegal in that it violated granted Road Right of Way easements when Parks closed the 3.1 mile section of Coyote Canyon Rd. to motorized use with the implementation of the PUP in 1995. We refute the recent assertion by Chief Legal Council of Parks, Tim LaFranchi who stated on 11/1/02, "none of these exceptions (easements & Right-Of-Ways) include Coyote Canyon Rd. or are located in the vicinity of Coyote Canyon Road". CORVA's recent research proves contrary to this assertion.

### 2.3.5 PUBLIC INVOLVEMENT

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*The majority of the written and verbal comments received during this process indicated a general desire for the Park to stay as it is with no new facilities or operational changes of any kind.*

The Park in its quest for more Wilderness and Preservation have devised and picked preferred Alternative 3, which has been chosen over the input and wishes of the majority of the public. Are the tax payers being served? This park is increasingly becoming the park for an elite few minority and paid for by the majority.

### 2.4.7 RECREATIONAL ISSUES

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*Some active and passive uses of the Park may conflict with each other in areas of shared use.*

The Park currently has 405,000 acres that are Wilderness which can only accommodate passive uses, yet ABDSP promotes these conflicts by hindering access to these areas for the public. According to the Brooks Report, "The Park is a public asset, paid for by visitors and residents

#137. The General Plan provides for this goal. The following are examples of goals or guidelines that promote strong working relationships with varied user groups: “work closely with recreational groups to ensure that their specific needs are addressed and incorporated into management decisions, where feasible and appropriate” (Page 3-37) as well as “Encourage and develop volunteer groups and work programs that are consistent with park needs and values” (Page 3-40).

#138. In the past, utility companies have proposed power and water lines through the Park. Had the proposed crossing areas been “backcountry” (similar to a State Park designation) instead of wilderness areas, they may today contain power line or water line utilities and easements.

#139. The process of implementing any goal or guideline of the General Plan begins with the approval of the plan by the State Park and Recreation Commission. Because of the programmatic nature of the plan, the timeline and means for implementing goals and guidelines is not specified. These are often determined by future planning efforts (such as management plans indicated in the General Plan – See Section 3.4), by superintendent order, or as the need arises, and based on availability of staff and funding to implement these General Plan guidelines.

136 alike: of the 650,000 acres, only a small fraction is disturbed by visitors - so promote it to them."

3.2.3.2 PARK MISSION STATEMENT

To develop and maintain partnerships that are effective in helping to meet the objectives of the Park. (This was bullet point 7 of 9)

137 Currently the Park has only established partnerships with conservancies and groups that promote land acquisition. To be balanced the Park needs to establish partnerships with responsible recreational interest based groups that represent all forms of recreation currently allowed within the park. This includes motorized, equestrian, hang gliding etc.

3.2.4.4 BACKCOUNTRY ZONE (BZ)

Overview, Purpose & Intent, Camping, Facilities, Social Experience and Activities. (These parameters are all individually described in this section)

138 What is described here is twisted and distorted in Alternative 2 as written in 4-4-3 on page 4-8. This distortion of adding potential utility lines and facilities through the Park is absurd. The common mantra of "may cause an adverse impact on bighorn sheep habitat and wilderness qualities is echoed again with the unfounded fears of numbers of utility trucks and utility-type facilities within the Park would have the potential to increase significantly. Lets get real. Will ABDSP ever allow utility lines and other facilities to be built in this park?

PAGE 3-37 RECREATION

Guideline: Work closely with recreational groups to ensure that their specific needs are addressed and incorporated into management decisions, where feasible and appropriate.

Guideline: Minimize user conflicts . Facilitate discussions among competing user groups. As appropriate, consider the management measures including, but not limited to special designations of routes or areas for specific user groups.

139 Guideline: Ensure that appropriate recreational opportunities are available for people of all abilities, including seniors, children, and people with disabilities.

\* moving the alignment of trails and roads

How, when and where is this process to begin? So far this is just lip service, but if the Park has the gumption to follow through with these guidelines, it would begin the process of changing its negative image with the community.

3.3.1.9 COMMUNITY INVOLVEMENT and MARKETING

#140. Thank you for your input. The General Plan guidelines you cite provide direction to the Department for many of the actions mentioned. Please see Response #54.

*State Parks are integral members of their communities, sharing responsibilities for local and regional issues that include youth development, economic health and planning. The community must be as a part of the decision making process and must stay connected to the Park.*

*Guideline: Promote interaction between the Park, local communities and non-park lands.*

Here's where the Park needs to really take an honest look at itself and take the recommendations of the Brooks Report to heart:

"We recommend that the Park aggressively step up to marketing efforts in terms of personnel, signage, and outreach efforts. We quite frankly, were shocked at how few people (even in Southern California) even know the park existed. This increased marketing presence could be enhanced through a variety of vehicles, here are some initial ideas:

a. Through internships, Americorps, or Conservation Corps, staff/volunteers would travel throughout the region to talk about the park, its wildlife, fauna and its prehistoric history. This can be done with a slide or PowerPoint presentation and actual fossils, live animals and/or plants from the region. An incredibly fascinating program could be put together easily and would garner incredible interest. The front page article of the Parks tabloid squeezing 500 million years of history into a single year would make a fascinating presentation of its own! The program would be available to Kiwanis, Rotary and other service clubs, schools, environmental education centers, chambers of commerce (dinners and luncheons) at tourism conferences, colleges, etc. This type of program should be implemented and produced year round.

b. A trade show booth should be put together that would include photographs, history and stories about ABDSP. This could be a cooperative effort with the Chambers of Commerce and/or the Natural History Association. The "booth" or display would be placed in regional malls, convention center common areas, large office building foyers, transit stations, airports and other high traffic areas on a rotating basis.

c. The Park should promote itself in the other state parks through the distribution of the newsprint tabloid, and displays in other parks – including National Parks in the state.

d. The Park should do everything it can to help market its vendors, such as San Diego Outback Tours, a park vendor. This promotes "responsible" and low-risk tours of park areas (in terms of park damage and personal risk) and helps the economy of the area. The park is an important tool for the region: its existence, with some marketing, can provide the basis for importing millions of dollars in spending to the region and to California, which translates to increased tax revenues, which in turns provides additional funding to the parks system.

Note: ABDSP is currently in litigation with San Diego Outback Tours that the Brooks Report has praised.

e. The park should also establish partnerships with local organizations and businesses to cross-

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**#141.** The Department does not imply or infer potential land acquisitions. However, the Department can legally acquire land from willing sellers. Please refer to Section 3.3.1.10 for a description of the types of land acquisitions that the Department would consider should they become available. This Section also describes the beneficial reasons behind land acquisitions for park purposes and visitor uses.

market the park and to provide educational tours and workshops, to promote stewardship of the park. The park should help fund the Activities Guide, the Map brochure and other marketing efforts as part of a "team approach" rather than a stand alone entity. This would reduce overall costs and provide a stronger marketing presence.

f. Park employees should visit National Parks to see how "visitor oriented" parks operate. Current impressions and comments by park employees lead the general public, area residents and others to believe the attitude at the park is geared far more to preservation than one of sharing this incredible asset. They should be provided with National Park training so they can better understand the balancing act between preservation and keeping the public asset available to visitors.

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g. Finally the park needs to do a much better job of community outreach within Borrego Springs. As is typical of a small rural communities, hard feelings sometimes run deep and the park, as a state-run organization, is not immune to that. Park staff should be much bigger part in the community and should play a much more active role so that partnerships can be developed and fostered.

Note: ABDSP should have a partnership/agreement/understanding with its immediate neighbor that also is managed by State Parks. This is Ocotillo Wells SVRA. They have equipment on site that ABDSP does not have. In the advent of emergencies such as flash floods that have caused road damage within ABDSP, this equipment and its operators should be authorized to make timely repairs that will also save tax payer dollars.

### *3.3.1.10 REAL PROPERTY ADDITIONS and MANAGEMENT.*

*California State Parks has responsibility for the protection, preservation and management of all real property (land) owned by California State Parks: (Re: acquisition, see PRC 5016-5016.1)*

*Goal: Acquire land from willing sellers that will enhance the visitor experience and/or the integrity and preservation of natural and cultural resources.*

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*Guideline: California State Parks will consider the following types of land acquisitions, should they become available.*

*\* Minimize negative adjacent land use effects (e.g.: light pollution, noise, protection of viewsheds and sense of solitude, protection of regional aquifer, significant poaching and trespassing).*

*\* Eliminate adjacent land use that conflicts with park purposes.*

*\* Eliminate inholdings to ensure more effective land management.*

I find it very problematic that a park of this size, that has stated that it's understaffed and its rangers are already covering way to much acreage, feels so strongly to promote this cycle and acquire additional land. Prudence would tell any other entity that enough is enough.

#142. Thank you for your involvement and dedication in assisting with trail and road issues and projects. The Department recognizes the benefits that park volunteers provide, among them cost savings and facilities maintenance and improvement. As prescribed in Section 3.4.2, the Roads Management Plan will have “input and advise from user groups”. The Department recognizes CORVA, among other user groups, as having an interest in providing this input and advice.

#143. The Department recognizes the importance of this area to potential visitor use. Hence the Goal stated in Section 3.3.2.2: “Support efforts to make The Carrizo Impact Area safe and preserve the scenic beauty of this areas as well as the historical integrity of the wartime landscape as is safe for park staff and visitors.”

#144. Please see Response #12, #36.16 and #37.10. CSP has reviewed the deeds sent by CORVA and additional deeds in our ownership files. None of these deeds supports CORVA’s contention that vehicular access is required as a public right of way, and, as noted previously, CSP provided a letter with our analysis to that effect. Although the Dudek report identified alternate bypass routes, it also identified substantial adverse environmental affects to natural, cultural and scenic resources that each of the proposed bypasses would cause. To pursue these bypass routes would compromise the Department’s Mission and they are not under consideration for further study.

141 Also, as previously pointed out earlier in my comments, is this park trampling over grant agreements as outlined in the deeds from previous inholders. By doing so, ABDSP is apparently in violation of certain aspects under Real Estate Law.

The three bullet points noted of several listed, indicate an insatiable appetite by ABDSP to acquire additional land. The language here clearly implies that ABDSP is thirsting for OWSVRA and the popular Truckhaven Mud Hills on its eastern border which is west of the 86S Hwy and Salton City.

Many people feel that this compulsiveness to acquire more land needs to be reigned in.

3.1.3.11 INFRASTRUCTURE and OPERATIONS

*Guideline: Develop a comprehensive management Roads Management Plan and Trails Management Plan ( to include issues such as maintenance, volunteer efforts, resource impacts, clearly defined regulations, etc.) The following criteria will be evaluated and addressed within these plans.*

*\* Roads and trails or portions of roads and trails, may be closed or rerouted as a result of the findings of the Roads and Trails Management Plans, or when resources are being damaged or compromised.*

142 The responsible organizations and clubs that represent equestrian, motorized and mechanized use have been waiting in the wings for ABDSP to adhere to these suggestions. We are and have been ready and willing to volunteer on trail and road projects. And there have been numerous times that our volunteerism has been needed. But the current management of this park has continued to ignore us and is unwilling to embrace us. The time to have volunteer agreements and efforts with these user groups is way over due.

There is a need to have a cooperative agreement with the parks neighbor OWSVRA. Use of their heavy equipment on site at OWSVRA is funded by the tax-payers and comes under the same umbrella of State Parks. The time to expedite trail and road repairs that will save tax-payers dollars is needed. Inconveniences of closing off sections of the park to visitation will also be reduced.

3.3.2.2 CARRIZO IMPACT AREA

*Because of the potential danger of uncovering unexploded ordinances, the public is denied access to one of the Park's most scenic areas.*

143 The historic Mormon Battalion Trail runs thru this area and yes it's a shame that the public can't at least visit this famous area and relive its history. The shame is, that ABDSP under it's current management has denied the offer by the military to clean up this area of unexploded ordinance. State Parks should reopen talks with the military and clean this place.

3.3.2.3 COYOTE CANYON

144 *The area supports valuable scenic vistas as well. With the exception of several miles of park*

#145. Please see Responses #37.2, #54 and #114.

#146. Please see Response #38.

roads, the majority of Coyote Canyon is designated State Wilderness. A 3.1 mile-mile section of the canyon remains closed to vehicle use in order to protect these sensitive resources. The Coyote Canyon Public Use Plan was produced by California State parks in 1995 and evaluated by the University of California in 2002.

As stated earlier, ABDSP falsely led the public in 2001 that the PUP with its monitoring and suggestions would be available to the public in the spring of 2002. This never materialized in its smoke and mirror scheme to lock up this canyon from most members of the public. Parks has ignored grant deeds that have stipulated that "**The public has the right to use the De Anza Trail**". The De Anza Trail and Coyote Canyon Rd. are one of the same.

144 In 1987 a bypass around the Lower Willows section of Coyote Canyon was successfully completed by realigning the road. This can be done for the closure area as well. A feasibility study released in 1999 by Dudek & Associates clearly proposes several routes that can bypass the 3.1 mile closure area.

The study mentions that to do so would involve realigning the road in existing State Wilderness which is not permitted. Many feel that this was done in 1987. The current management of the park denies that the realignment went through Wilderness at that time. This will be challenged. This reroute should commence to restore this historic Right Of Way and County Road.

The public has been denied too long of the use of this road. The Parks assertion that this use of the road is a detriment to the Bighorn Sheep and the Vireo is based on emotion and inconclusive facts.

The need to add additional Wilderness acreage in (actually the majority of what is called out in this plan) Coyote Canyon, is a direct and calculated strategy to deny historic Right-Of-Way use of this road

#### 3.4.2 ROADS MANAGEMENT PLAN

#### 3.4.3 TRAILS MANAGEMENT PLAN

145 *This plan will be developed separately from the General Plan and will serve as a tool for park management, with input and advice from user groups to make decisions about road conditions and priorities changes over the years.*

The organizations that represent and support responsible recreation request to be fully informed and involved in this process. We have felt denied and excluded in many decisions in the past and present. We are stakeholders as well. Include us as your partner as you do various other groups. We have experienced various forms of discrimination.

### 4 ENVIRONMENTAL ANALYSIS

#### 4.1 SUMMARY

146 *California State Parks is the lead agency responsible for preparation of the proposed ABDSP General Plan in compliance with the California Environmental Quality Act (CEQA) as required by the Public Resources Code Sections 5002.2 and 21000 et. Seq. This Environmental Analysis Section and other sections of this document constitute the first tier Environmental Impact Report*

#147. Please see Response #100. CSP respectfully disagrees. The general consensus at the public workshops was support of the Preferred Alternative.

(EIR) as defined in Section 15166 of CEQA Guidelines.

\* Extend existing Wilderness by approximately 9%. This results in approximately 57,800 acres classified as a Wilderness sub-unit in addition to State Park designation, thereby providing further protection to resources and wilderness values.

\* The amount of acreage of Natural or Cultural Preserves would be approximately 7% more. In addition, approximately 44,500 acres would be classified as a cultural and/or Natural Preserve sub-unit to the existing State Park Classification, thereby potentially significantly limiting recreation activities, such as highway-legal vehicle use, equestrian use, open camping, off trail hiking and overnight camping.

146

The preferred Plan allows for existing recreation activities to continue while providing protection to sensitive Park resources. The Environmentally Superior Alternative provides greater protection to cultural and natural resources but has the potential to significantly affect existing recreation activities within ABDSP.

Why isn't the Plan fully addressing the EIR, but instead calling this the "First Tier" of the EIR? Why is it not fully forth coming and when will the public be informed of its conclusion? The Park in its desire to adopt the most restrictive plan, acknowledges that it will be causing significant affects to recreation. The public deserves a full and forth right evaluation to its loss of recreation within ABDSP. The "potential to affect recreation" is not sufficient. This plan needs to clearly address the loss to recreation and mitigate its loss by providing and/or making up for this loss somewhere else in the Park. What types and exactly where in the Park is recreation going to be affected? What specific roads and trails will be affected? What specific areas of the park that the public is currently able to visit, will be lost for public visitation or at least restricted upon implementation of the GP?

#### 4.4.3 ALTERNATIVE 2

This plan is totally lacking in describing this alternative. How can this summary section adequately describe a viable, and again what the majority of the public supported, Alternative with only one paragraph?

147

This plan does this by lacing it with, " Backcountry land-use designation in Coyote Canyon would permit new roads and utility facilities that may cause an adverse effect on bighorn sheep habitat and wilderness qualities".

This is not accurate and neither is the insinuation that "Backcountry has the potential to allow new roads and utility lines through the Park. The number of utility trucks and utility type of facilities within the Park would have the potential to increase significantly"

These two poison pills, which are not accurate, are the mechanisms or means to destroy Alternative 2. This should be the alternative chosen. This allows for the protection that the Park needs without restricting its enjoyment and access by the public.

#### 4.4.4 ALTERNATIVE 3 - ENVIRONMENTALLY SUPERIOR

#148. Please see Response #40.

#149. Please see Responses #40 and #147.

#150. Per CEQA Guidelines, an NOP is required to be sent to interested agencies. Please see Responses #11, #12 and #37.10. Additionally, the information regarding the Coyote Canyon PUP was available during the public comment period.

*But while Alternative 3 provides additional protection to sensitive resources, it has an adverse effect on certain existing outdoor recreation activities including high-legal vehicle use, equestrian use, mountain bike use, and open camping. These activities would be restricted within the Natural/Cultural Preserve Zone. **This alternative could cause a significant impact to recreation and is not within the public's level of acceptable change.***

148

This plan calls out nearly 60,000 additional acres of Wilderness, Natural and Cultural preserves. This acreage would clearly sever access and recreational pursuits that the public seeks. As mentioned, it could cause a significant impact to recreation and this is not within the public's level of acceptable change. My assertion is that this plan WILL cause a significant impact to recreation. At the very first GP public meeting in Borrego Springs, Clay Phillips mentioned that Recreation was one of three of the main components of the GP. Why does recreation have to yield so much to resource protection? There is no reason that the GP can't address resource protection and also protect recreation.

Throughout the Draft is language insinuating that additional resource protection measures may come on line in the future. This is very worrisome. The public has witnessed a one way ratchet mechanism under the current management that is geared towards more and more wilderness, preservation and resource protection and less and less towards recreation and access. Whose park is this?

#### *4.5.3.7 RECREATION RESOURCES (RR)*

##### *Impacts*

*Management zone designations and sub-unit classifications associated with allowable visitor use has the potential to adversely affect recreational activities as a result of cultural, natural and aesthetic resource protection. Development, maintenance, erosion, dust and resource degradation may also have an adverse affect on visitor experience.*

149

##### *Mitigation RR2*

*California State Parks will make available to the public alternative recreational activities that are compatible with resource protection in areas within ABDSP that contain sensitive natural and cultural resources.*

It's obvious that ABDSP is hell bent on pushing extreme resource protection, wilderness and preservation at the expense of recreation. The will and input of the tax-payer is being driven over by ABDSP with this draft and its language that calls out for more of the same in the future.

150

#### *4.6 PUBLIC COORDINATION*

*A Notice of Preparation (NOP) was circulated through the State Clearinghouse to local city and county planning offices as well as to affected special interest organizations and individuals.*

The public needs to be notified as well as the local governments with any issue that may even

#151. CSP appreciates the public participation that has helped to form the Anza-Borrego Desert State Park General Plan. Please also see Responses #11 and #40.

150 conceivably affect their interests involving ABDSP. The Park failed in these efforts when it withheld the Coyote Canyon PUP that it promised to be available to the public the spring of 2002. The PUP is a critical component of the Draft Plan and yet it was not made available to the public. It's a shame that a 650,000 park that is owned supposedly by the public taxpayer is served in this manner.

151 On behalf of the literally tens of thousands, if not millions of concerned citizens that share the very concerns and issues as stated in these comments, we can only hope that the California State Department of Parks and Recreation, fully comprehend and evaluate the preferred plan and the direction that ABDSP is intending to go

Sincerely,



Jim Arbogast, VP Land Use

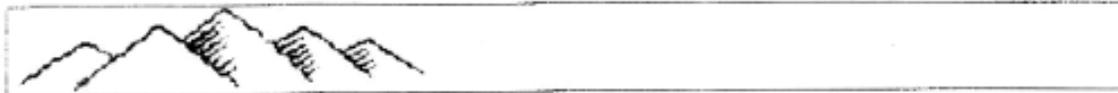
Cc: David P. Hubbard , Environmental/Land Use Attorney  
Pete Conaty, CLORV Exec. Dir.  
CORVA BOD

Note: Certified Mail Receipt # 7001 1940 0004 9160 8406

#152. Please see Response #100.

#153. Please see Responses #65 and #93.

#154. Please see Responses #40 and #54.



California Equestrian Trails & Lands Coalition

March 10, 2003

SENT VIA FAX: 619.220.5400

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

REGARDING: Anza-Borrego Desert State Park General Plan/Draft EIR

Dear Sir or Madam:

The California Equestrian Trails & Lands Coalition (CET&LC) is a broad ranging equestrian organization representing all the major pleasure horse organizations in the State. Our collective membership is 46,000 and we try to reach a consensus on any agency plan such as the ABDSP Plan/ DEIR. We have been working closely with our member organizations and have developed the listed comments from those individual organization responses.

After careful review of all Alternatives, the CET&LC offers a "qualified" support of Alternative 2 for the following reasons:

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- 1. In contrast to the Preferred Alternative, the Focused Use Zones (total of 5,200 acres) would allow for the development of recreational facilities, including equestrian campgrounds and staging areas, needed to accommodate increased visitation based on the projected population growth.
2. Currently, 68% of the ABDSP is designated as Wilderness. The Preferred Alternative would increase Wilderness to more than 77%. Significant new Wilderness areas would encapsulate existing State Highways. This is problematic because management of Wilderness presupposes no vehicle traffic. The largest proposed Wilderness addition is along the De Anza Trail. The De Anza Trail is a historic route and was the main access to Borrego Springs from Anza and because of this historic route, the area should remain as Backcountry. To designate more Wilderness would restrict the access to the Park by requiring the decommissioning of roads.
3. In contrast to the Preferred Alternative, Alternative 2 would have about 207,000 acres of Backcountry Zone. This Zone provides the visitor with the most freedom, with fewer camping restrictions.

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As stated above, we are "qualifying" our support for Alternative 2. Below are problems that are common to all the Alternatives, except the "No Project" Alternative.

- 1. The designation of the San Felipe area as "Cultural Preserve" will severely impact the long established use of the area for the PCT staging area. Overnight camping is long established for those who drop or pick up PCT users.
2. The CET&LC supports the rights of equestrians to access all roads, trails and washes and to ride "cross country".
3. Under the heading Recreation, there is a guideline "Assess current and potential recreational activities for compatibility with State Park, Wilderness, Cultural Preserve and other land designations." How are these designations prioritized? Who will make the decisions regarding prioritization? What criteria will be used? How has it been developed? How has CSP preserved pre-existing Wilderness rights (definition of federal historic wilderness users)?

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#155. The positive correlation between the establishment of invasive exotic plants and the human-induced disturbance of soils and vegetative cover is clear (Hobbs and Huenneke 1992). Many researchers have documented soil disruption, plant trampling, and erosive effects of equestrian activity (Widner and Marion 1993). Furthermore, the ‘weed-free feed’ policies and considerations of the National Park Service, Bureau of Land Management, and National Forest Service emphasize the need to further identify horse feed as among the potential vectors of exotic plant invasion. These are all major issues for Park management. Please also see Section 2.2.1.3; Section 3.3.1.3: Exotic Biota: Goal 2: Guideline 2; and response to comment #36.

#156. The General Plan is a management tool that can be used well into the future. In this case, “less is more” in that the General Plan provides well defined Goals and Guidelines and land use management zones and criteria for park managers. The General Plan was developed to protect resources and allow recreational activities. Please see Response #40.

#157. Yes, the public’s access and the public’s resources will be allowed different and dynamic levels of protection under the General Plan. These will be primarily developed under the management plans and new recreational opportunities will also be developed.

#158. Please see Responses #36 and #156.

- 155 4. There is no data or resource information given in the Plan to support the restriction of horses to roads and trails. Page 2-43 states that "equestrian" traffic may erode habitat. The statement "*Equestrian trails, staging areas, horse waste, and the associated spread of exotic vegetation are major issues involving montane habitats...*" is not quantified with any data. The Goals and Guidelines in section 3.3 states that "*Land management actions will be based on sound scientific data...*" It appears that equestrian use is a very small portion of the visitor use in the Park. The only number given for equestrian visitors is on page 2-92 which cites 3,000 visitors (less than 1% of the total annual visitors) to the "horse camp".
- 156 5. The General Plan Draft EIR is a "programmatic" level planning document and as such should be general in nature and provide the basic back-drop for site specific plans. This plan is an example of a bureaucracy run amuck. There are too many levels, too much emphasis on "preservation" issues that can be best addresses on a site-specific basis. All of the future (seven) additional plans seem to be directed toward determining what other limitations will be put on recreational users of the Park.
- 157 6. Alternative 3 was determined to be the most "environmentally superior" but not chosen as the Preferred Alternative it would significantly affect existing recreational activities and "*is not within the general public's level of acceptable change.*" (page 4-8) Then State Parks maintains that sensitive resources can be adequately protected through the site-specific management defined in the Preferred Alternate and furthermore that the subsequent planning efforts may result in the establishment of additional preserves. In other words, the public's level of acceptance will be incrementally changed. This seems to be a rather subversive way to eventually reduce the recreational use of the Park.
- 7. Table 6.7 states that Alternative 2 has the potential to impact more natural resources and offers the least amount of resource protection. Area identified as significant resources can be protected at a site-specific level. We in the Coalition try to reach a balance between natural resource and recreational uses, not one over the other.
- 8. Table 6-7 also indicates that "potentially significant" impacts can only be avoided, minimized and/or mitigated to a level below significance in the Preferred Alternative or Alternative 3. This is simply not true. All alternatives, even the no project alternative allows for site-specific resource protection.

158 We urge the Park planners to simplify the plan, protect the recreational uses and users and to emphasize site-specific resource protection where need based on sound data collection and sound science. We likewise support the use of a Recreational Advisory Committee that can reflect the views of the various user organizations. You will find several statements similar to other equestrian organization responses but this is the consensus of the collective Coalition.

Sincerely



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#159. Please see Response #69 and the note above. No official extension was granted by CSP.

#160. Please see Response #92.

#161. Please see Response #93.

#162. These are not relevant to the General Plan but may be addressed in the future Trail Management Plan. Additionally, these are existing conditions and not relevant under CEQA.

#163. Trail access rights are not environmental issues and therefore are not subject to CEQA. However, provisions for backcountry camping and support for backcountry travel will be addressed in the Camping Management Plan. The potential environmental impacts associated with Camping will be addressed under CEQA.

#164. The Trail Management Plan may restore some gentle use on historic trails or keep the historic trail intact and provide a parallel route along the same corridor. Portions of many of these historic trail corridors remain inaccessible on private land but CSP will endeavor to keep trail access open along these corridors when in accordance with resource management guidelines.