



California Off-Road Vehicle Association

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Red Rock State Park Issues of Concern

The following comments are based on the Preliminary Planning Concepts for the Red Rock State Park General Plan Revision that were first provided at the March 26 and 27, 2019 public meetings (Concepts document). We understand that Concepts #1-4 are preliminary, however they are not accompanied by enough resource information for the reader to provide informed comments on these concepts. In addition, the maps on which the concepts are based are incomplete and do not reflect the actual existing condition of the transportation system as depicted on Red Rock Canyon State Park maps (attached).

We greatly appreciate the extension of the comment period. This has provided time for us to perform additional field work with the assistance of Parks staff, which was especially fruitful. We have also been able to locate supplemental material that has helped inform our comments. Unfortunately, much of this material is taken from previous plan revision efforts in 2002-2003 and 2008-2009, so the information is dated and does not include any additional surveys undertaken since that time. We look forward to receiving more complete surveys and information as the planning process moves along, and our comments will be revised accordingly.

Since CORVA is an off-road vehicle organization that represents the interests of our members, our comments are formed using that perspective. However, we have approached this project with the understanding that Red Rock Canyon is a State Park with a mission that is different from an SVRA, and that non-SVRA state parks are operated under a mandate that emphasizes resource protection as a greater priority than off-road vehicle use. In addition, a State Park must provide equal or greater opportunity for non-motorized recreation, and ensure conflicts of use between motorized and non-motorized users must be avoided whenever possible.

Because Red Rock is located between the Jawbone/Dove Springs OHV areas, Randsburg and Spangler Hills OHV open area, there is an inherent responsibility entrusted to State Parks to provide adequate and necessary access for greensticker (non-street legal) registered vehicles to travel through the park as needed for connectivity between these areas. The majority of visitors to the area who seek a more significant OHV riding opportunity visit areas such as Dove Springs, Jawbone Canyon, or Spangler Hills, with a marked exception for 4x4 vehicles, which have historically enjoyed driving experiences in the park, most notably the Nightmare Gulch 4WD Trail. Because Red Rock Canyon State Park consists of an expanse of approximately 30,000 acres of desert, it appears that all parties accept that it is necessary to designate a primitive road system that allows a wide range of visitors, including the elderly and disabled, to enjoy the park.

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Red Rock Canyon was originally designated as a State Recreation Area. The designation was subsequently changed to a State Park around 1980, however the use of greensticker registered vehicles was allowed to continue unimpeded until the present, contrary to statute relating to state park operations, for no other purpose than travel through the Park (ingress and egress). Additionally, 4x4 use and travel through the park was also allowed to continue and numerous trail maintenance efforts through the years had been sanctioned on the Nightmare Gulch 4WD Trail.

We submit that the current primitive road system, as shown on the attached map, serves to directly enhance the public's enjoyment of the natural, scenic, and ecological values of the park and is not an attraction in and of itself, and is therefore consistent with the Public Resource Code. Input from individual stakeholders and groups such as the Ridgecrest Roundtable has indicated a great deal of concern that the concept plans reduce connectivity thorough the Park, as well as limiting access to various points of interest. The Concept Plans #1-4 have done little to allay these concerns because all propose closure of long-established routes primarily through the addition of natural reserves and preserves.

Motorized use of the baseline OHV trail system has occurred for over 40 years. Unaccountably, natural and cultural resources have been identified as being at some risk despite this lengthy history of use, even though the system has had little if any maintenance. The park has also experienced significant storm events that have washed out roads, trails and presumably had a considerable effect on resources that can be attributed to an 'Act of God', rather than attributed to ongoing motorized vehicle use, as we believe has been assumed in the Preliminary Planning documents. We believe that in most cases this history indicates that motorized use has by comparison had negligible, if any, negative resource impacts.

We are in agreement with the comments submitted by the Ridgecrest Roundtable, summarized as follows:

GENERAL

We support maintaining access and connectivity from both Hwy 14 and Red Rock Randsburg Road.

We feel it is premature to plan an Onyx/Red Rock Operations Hub until the Onyx SVRA's management plan is developed. We find that some concepts are not likely to yield enough motorized use to warrant an SVRA Operations Hub being location in Red Rock as opposed to within Onyx.

Existing roads proposed as closed should be designated as non-motorized trails rather than be removed from the inventory.

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We support the validity of suggesting an SRA designation per the authorizing federal act that transferred lands from BLM to the State Parks system.

We support the accommodation of equestrian uses.

We request that State Parks address issues surrounding maintaining artificial and natural water sources for wildlife.

We suggest the use of cherry-stems and corridors for motorized access to lands within proposed preserves

BASELINE

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

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

Route closures taken under emergency action must be re-analyzed with respect to their cumulative impacts since many such actions were undertaken without local public input. Emergency closures are imposed upon the public with little planning and even less explanation, leading to rumor and resulting in mistrust between the agency and affected members of the public.

RANGE OF CONCEPTS

Although the four concept's descriptions are wide ranging, the accompanying maps do not depict an adequate range of alternatives. Management prescriptions reflected across all maps appear to be pre-decisional, discouraging input from the public. We urge State Parks to analyze a substantially wider range of alternatives for the Draft EIR, and believe alternative maps are needed that better depict that range. CORVA believes there must be a concept presented that retains as open Black Rock Canyon Road, Last Chance Canyon Road, and Nightmare Gulch Road.

Route Specific Comments Provided by CORVA

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Park Designation/Sierra View Road: we understand that Red Rock State Park would have be changed to a Special Recreation Area for greensticker use to continue on the primitive road system, and this will be determined by the Parks Commission. Concept #3 presents an alternative that would leave Red Rock classified as a State Park, but would allow greensticker use of Sierra View Road. We believe this is an unacceptable proposal, as this only represents an absolute minimum for greensticker access to allow connectivity from the Dove Springs area to points east.

Although Sierra View Road is more than 3 miles long which normally indicates the limit for non-street legal ingress and egress in a state park, it appears that an exception is proposed to allow for greensticker use on this route. Although we support this exception, we believe that common sense dictates this is an insufficient amount of connectivity that would result in confusion and traffic hazard for greensticker vehicles traversing the park.

Nightmare Gulch: given the long history of use and connection to the 4WD community, we propose that the utmost of effort should be exerted to keep this trail open to motorized travel. The emergency closure of 2013 was unneeded and unnecessary, even though it was presented as a public safety measure. Facts through the years contradict that explanation as many other more serious washouts had occurred without necessitating an emergency closure. The fact this closure was implemented without consultation with the affected community further compounded the error. Fast forward to this analysis in 2019, and the public is being forced to potentially face closure of a well-loved trail because of this unsubstantiated closure that has resulted in years of neglect of a previously well-maintained trail. State Parks is mandated with serving Californians, rather than ignoring and disregarding the needs of Californians. This mandate has been woefully ignored during the years Nightmare Gulch has remained closed to motorized travel.

If the access road to Nightmare Gulch must be gated for resource protection, barriers should be placed at either end of the Gulch as close as possible to the mouth of canyon. This would allow better hiking access to the most scenic part of the Gulch which is only about $\frac{3}{4}$ mile long. Visitors are most likely to access this area from the South, which would be the best location for a parking area. A parking area at the south end of the Gulch is shown in Concepts 1-4.

A parking area closer to the northeast end should be added if possible. This area could be accessed from El Paseo Road where it intersects with Cudahy Creek Road as shown in Concepts 1-4, but should be located closer to the more scenic section of the Gulch.

A parking area near the northeast end of the Gulch is also shown adjacent to the private property inholding in Concept #1, however in this Concept the road has been converted to a hiking trail so it is unclear why a parking area is marked at this location. The road to this location is shown in the figure below and is accessed via the gate that is located past the Snow White Mine on El Paseo Rd. We

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strongly suggest allowing the road to remain open and placing a parking area at the location shown in Concept 1.

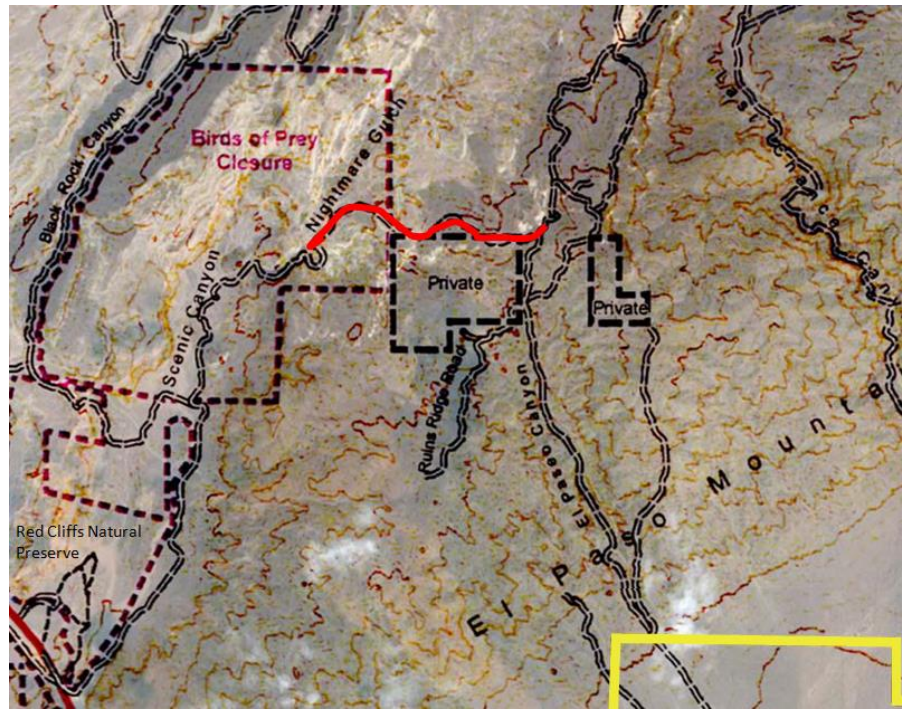


Figure 1 – Potential access route to Nightmare Gulch trailhead. This would be closer to the Gulch than the hiking trail shown in Concepts #1-4.

Black Canyon Road: we understand that Black Canyon Road has a cultural resource site in a location that would make rerouting or relocation of the route very difficult. We look forward to receiving studies that confirm this finding, with the understanding that the location of heritage sites must remain confidential. The length and location of the route are unlikely to make it attractive as a hiking trail. Equestrian stakeholder groups may wish to comment on its suitability as an equestrian trail.

Iron Canyon Road: is proposed for conversion to a hiking trail in all concepts. We submit that unless there are significant resource issues associated with this road that cannot be mitigated, that this road must remain open to motorized travel. Together with Tufa Point Road it allows a greater range of visitors to visit this scenic area.

If resource impacts that cannot be mitigated are identified, a discussion can be considered for conversion of the road to a hiking trail.

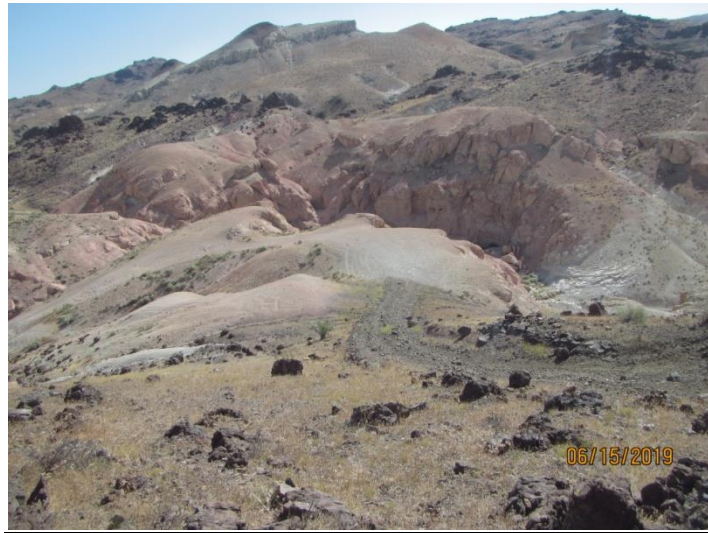
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Pinnacles Road: should be retained on the system. It is located away from the Cudahy sensitive resource area and could serve as a connection between El Paseo Road and Last Chance Canyon Road that would preserve connectivity across the Park. Although the approach to Pinnacles Road from El Paseo Road has excessive grade this could be reduced by improving the remnants of an existing road bed to reduce the grade. The trail should be improved by adding full bench construction along the contour line as the trail descends into Last Chance Canyon. We appreciate that this is a more challenging route than most others in the area and is effectively a one-way route going downhill. The trail would be suitable only for capable highway licensed 4X4 or greensticker vehicles.



Pinnacle Road as it descends toward Last Chance Canyon Road

Pinnacles Road should also be classified as a multiuse/hiking trail that ends at the proposed Cudahy interpretive site. For some reason this was not included in any of the concepts. The interpretive site would make an excellent destination.

Cudahy Creek Road: must also be retained as part of the primitive road system. *It is the only viable route* that connects the western part of the Park with Last Chance Canyon Road and points further east via Pleasant Valley Rd. Cudahy Creek Road was in existence since as early as 1967 (USGS maps) and despite little if any maintenance it is in excellent condition. It has a very gentle grade except where the route exits the canyon and joins El Paseo Road, and that segment exhibits little if any erosion because it is located on bedrock.

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

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(We understand that surveys to date indicate the presence of Red Rock tarplant, which is a California Rare Plant. (Rank: 1B.2, rare, threatened, or endangered in CA and elsewhere). Surveys of this species located throughout most of Cudahy Creek Road in, along and outside the roadway and within drainages of Cudahy Creek Road. Also, the proposed route goes through five documented archeological sites (KER-5951, KER-6258/H, KER-6260, KER-2545, KER-625). Additional archeological survey would need to be completed to determine the significances of those sites as part of the Department's environmental review. We understand that potential impacts would need to be evaluated and weighed against the benefit of the route to Park visitors which would be substantial. Seasonal use might be an option what would help mitigate impacts to biological resources.)



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

Establish a route around the Cudahy Site. Improvement and extension of the mining claim access road adjacent to the Cudahy site would establish connectivity through this important area and would relocate the route away from the proposed Cudahy Natural Preserve. A 2007 study by California Geologic Survey identified a potential route, see the attached map, as #1 in Figure below.

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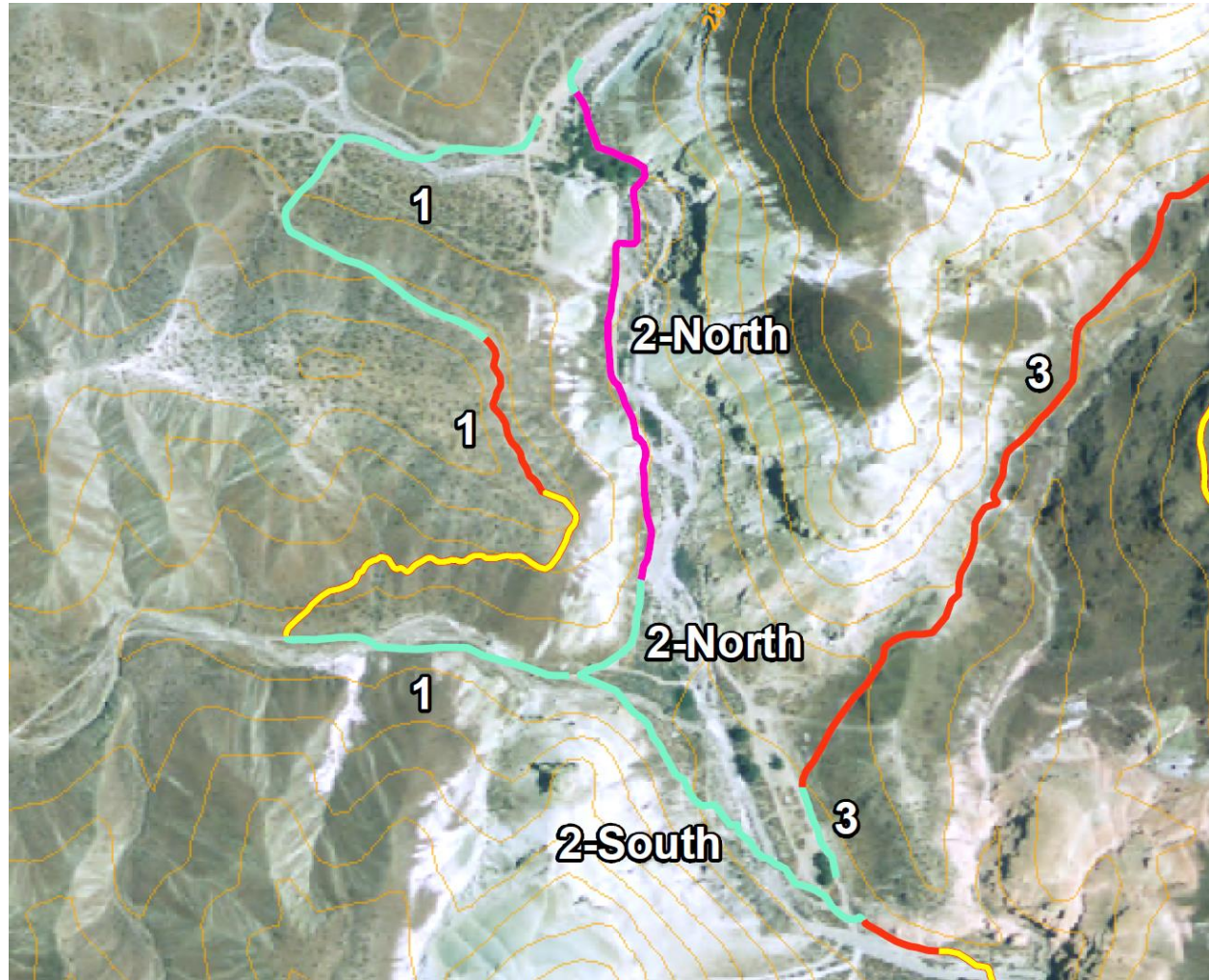


Figure showing trail #1 relocated around Cudahy Camp

Approximately ½ mile of new route construction (yellow) would be required to connect the upper section of Last Chance Canyon Road with Cudahy Creek Road. This route would address the problem of limited east-west connectivity as well as reducing potential impacts to sensitive resources. We suggest that this reroute be completed as a site specific CEQA project separate from the General Plan Revision.

There is an unnamed trail that runs parallel to Ed Paseo Road. It originates near the intersection of El Paso and Pinnacles Roads and connects back to El Paso Rd near the Snow White Mine. The approach to this trail has excessive grade similar to Pinnacles Road and this could be partially addressed by improving the old road bed at the El Paso intersection. The trail appears to have had little use. It is in

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excellent condition. It has a rocky surface that resists erosion, but makes the surface uneven and unattractive as a hiking trail. The trail runs along the ridge top and has outstanding views of Last Chance Canyon and the Nightmare Gulch drainage. Ideally it would be retained as a trail for street legal 4X4's or green sticker registered vehicles. As a minimum it should be retained as a hiking trail, although with the rough rocky surface and remote location it would probably receive little use.

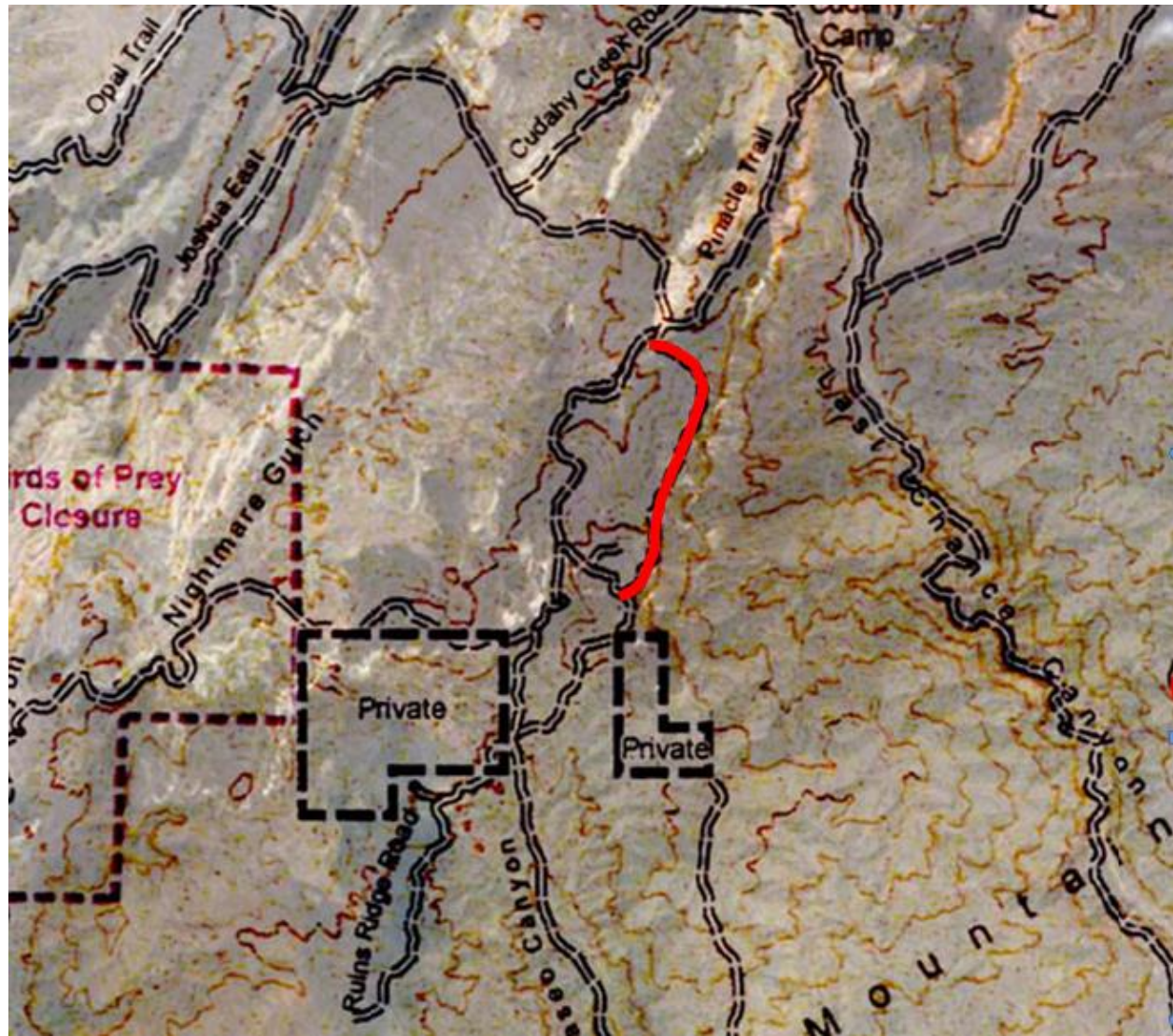


Figure 2 - Unnamed trail adjacent to El Paseo Rd

Trail EP 107 is not included in any of the concepts. The reason for this omission is not clear. This trail is a two-track route that connects the Burro Schmidt Tunnel area with lower Last Chance Canyon.

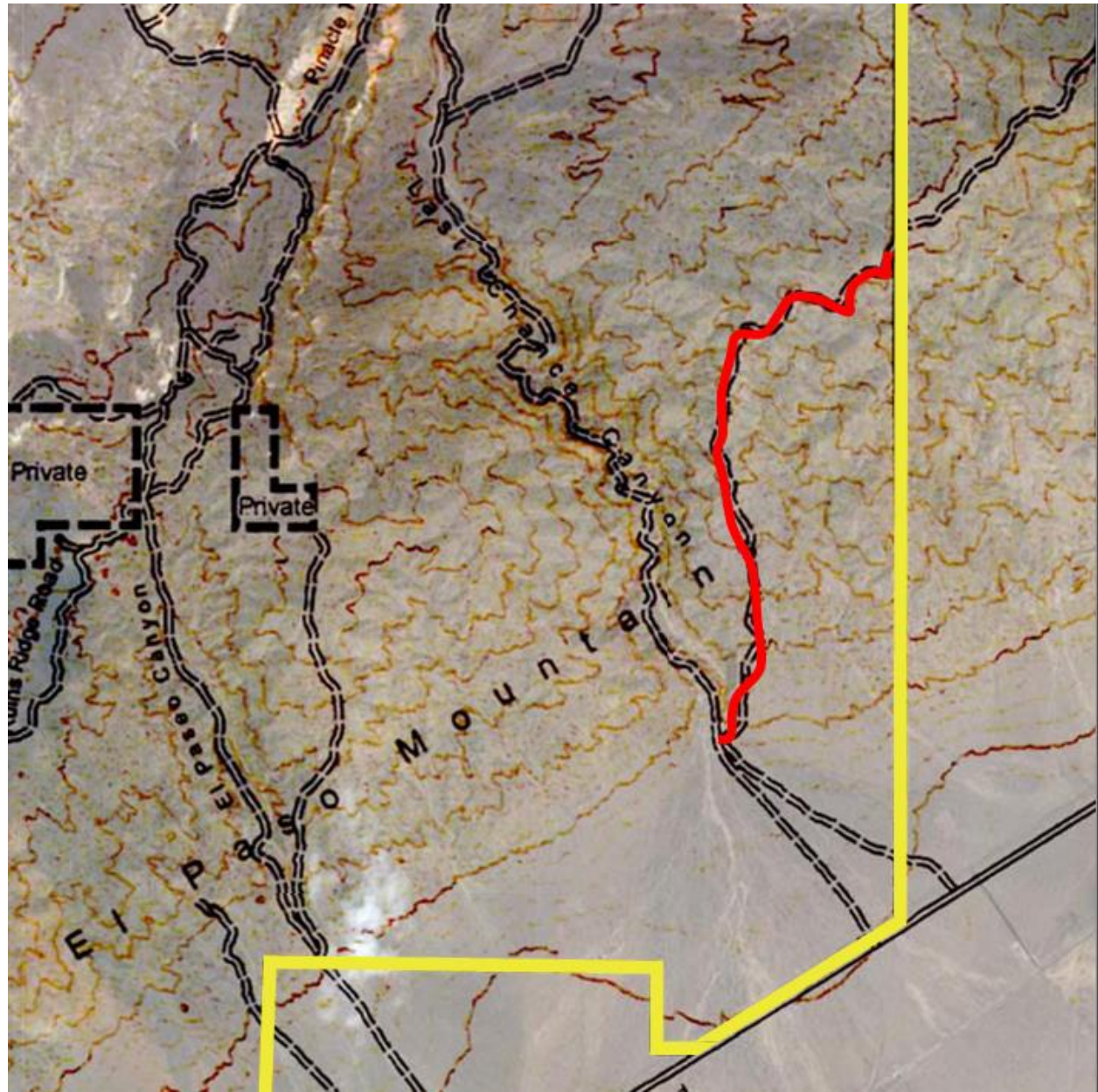
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The trail is presently open from Burro Schmidt to the Park boundary, which limits the value of the BLM section of the trail and encourages trespass onto the closed portion of the trail. Barring significant resource issues that cannot be mitigated this trail should be retained as part of the primitive road system.



Trail EP 107

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