



Current Revised Plan Concept Proposed for the Red Rock Canyon General Plan Revision Process

From the perspective of the Red Rock Canyon Interpretive Association (RRCIA), there are positive outcomes that will help with long term park sustainability. But a few inclusions to the plan are shockingly harmful.

RRCIA SUMMARY OF THE MOST CRITICAL POINTS:

RRCIA IS ADAMANTLY OPPOSED TO GREEN-STICKER OHV ACCESS WITHIN THE REVISED PLAN CONCEPT

- **California State Parks should be employing the model developed in the Anza-Borrego Desert State Park General Plan** to provide consistent management for like units involving similar resources and issues.
- **We support the Revised Plan Concept's elimination of green-sticker OHV access.** Ample opportunity immediately adjacent to Red Rock remains for vast OHV recreation in the local desert.

RRCIA IS ADAMANTLY OPPOSED TO SEVERING ACREAGE FROM THE STATE PARK TO CREATE A NEW STATE RECREATION AREA

- **The Revised Plan Concept proposal** to cut out a portion of Red Rock Canyon State Park for conversion to a State Recreation Area **breaches the intent of the California Desert Protection Act**, which transferred the impacted acreage to the State Park.
- This action is not in accordance with Public Resources Code section 5019.53. "Improvements that 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."
- **When State Park planners (who are charged with guiding both this Red Rock Canyon process and future plans for Onyx Ranch SVRA) ignore the classification of one unit in pursuit of long-term benefits and regional planning efforts for the primary users of the second unit, it represents a strong conflict of interest.**

- The preliminary documents and maps of this General Plan Revision will be “subject to a comprehensive environmental review pursuant to California Environmental Quality Act (CEQA) guidelines included in PRC §21000”, per the Parks own Revised Plan Concept Packet. However, it appears that decisions are being presented without proper environmental review. **California State Parks must be held accountable for the decisions they are making concerning sensitive plant and animal life, cultural, archeological and paleontological resources which may be significantly and negatively impacted in a manner which cannot be mitigated.**

RRCIA IS ADAMANTLY OPPOSED TO CREATING A SHARED VISITOR AND OPERATIONS CENTER AND PROVIDING ONYX RANCH SVRA USER ACCESS

- **Drafting a plan for Red Rock Canyon that is consistent with the unit’s “State Park” classification has been ignored and superseded by Onyx Ranch SVRA planning, represents a conflict of interest.**
- Inherent in this vision is a plan to not only not eliminate green-sticker OHV use from Red Rock Wash Road between the BLM’s Dove Springs Open OHV Area and Ricardo but to, in effect, actually increase traffic driving from Onyx Ranch SVRA towards a shared visitor center.
- This traffic would theoretically involve unlicensed juvenile operators of green-sticker OHVs which were prohibited from operating within Red Rock Canyon State Park by the 1982 General Plan and even earlier State Park and Recreation Commission decisions.
- The OHV-based Visitor Center at Jawbone Station is closer to Onyx Ranch properties and offers a much more logical efficiency partnership hub.

RRCIA SUPPORTS LESS RESTRICTIVE NEW ACCESS RULES FOR NATURAL PRESERVES TO ENHANCE VISITOR EXPERIENCE

- **The 2017 revision of California Code of Regulations section 4325 limits on-foot access to only trails unless a provision for access becomes incorporated within a General Plan. We very strongly support the inclusion of this provision, retaining the open, non-impactive, on-foot historic access enjoyed within the Park’s preserves.**
- California State Parks has been mute regarding this critical visitor enjoyment issue. **Being mute is equivalent to not grandfathering in historic use** and therefore constricting all future access to trails that do not reach or interact with the cliffs. Being mute represents no provision and dramatically alters Red Rock visitor experience. **We need to ensure that retention of historic on-foot access is preserved.**