



## TALKING POINTS

RED ROCK CANYON INTERPRETIVE ASSOCIATION VIEWPOINT ON THE  
RED ROCK CANYON STATE PARK PRELIMINARY GENERAL PLAN  
REVISION AND DRAFT ENVIRONMENTAL IMPACT REPORT (published  
October 2022)

**#1 RRCIA SUPPORTS ALTERNATIVE 2** (presented as  
Concept#4 in 2019) for the **GENERAL PLAN FOR RED ROCK  
CANYON STATE PARK** - Reference: Chapter 5, EIR, Section 5.23 (p. 517)

“Alternative 2 would focus on the protection of sensitive natural and cultural resources and would not allow any OHV use at the Park, including designated primitive routes.”

Concept#4 is outlined as follows in the General Plan Revision - “This concept would maintain the existing State Park classification. All Designated Primitive Routes would not allow green stickers. Some primitive routes would become non-motorized trails. This concept has the highest level of resource protection with additional natural and cultural preserves and expanded non-motorized recreation.”

**#2 RRCIA ADVOCATES FOR NO INGRESS AND EGRESS ROUTES TO BE PROVIDED AS SHORT-CUTS THROUGH THE PARK FROM OHV AREAS OUTSIDE OF THE PARK.** - References: Chapter 5, EIR, Section 5.3.2, Roads & Trails; Also Section 5.17.4, Impact Analysis, OHV Ingress, Egress Corridors (p.270 & p.448)

There are alternative routes that can easily be accessed and utilized as transportation corridors including Power Line Road and EP-15.

There should be no OHV's allowed in the park, including designated primitive routes that can have detrimental unintended impacts, including noise which affects all desert residents both wildlife and human as well as the aesthetic enjoyment of the desert landscape that is the primary reason for most visitors coming to Red Rock.

Allowing OHV access through the park on either the Red Rock/Cantil Wash or Sierra View Road, could threaten sensitive plants that use desert washes as their preferred habitat. In addition, there is a chance that allowing continued travel by OHV's through the Red Rock/Cantil Wash will disrupt valuable wildlife corridors; detrimentally affecting wildlife populations throughout California. (Reference: Chapter 3.1, Planning Issues).



## TALKING POINTS

### **#3 THE PURPOSE OF THE 1994 DESERT PROTECTION ACT WAS TO PROVIDE MAXIMUM PROTECTION FOR SCENIC AND SCIENTIFIC VALUES.**

**- References:** Chapter 1 EIR, Introduction, Section 2.8.2, Regional Planning Influences (p.138); Also Chapter 4, EIR The Plan, Section 4.2, RRCSP Purpose & Vision, Section 4.2.1, Declaration of Purpose, (p.138 & p.154)

The California Desert Protection Act of 1994 transferred over 17,000 acres to Red Rock Canyon State Park with the Congressional intent of restoring prior recreational damage. The legislation specifically emphasized management of this acreage "to provide maximum protection for the areas scenic and scientific values." The time has arrived for California State Parks to embrace their fundamental stewardship responsibility for this sensitive, beautiful, inspiring, scientific and culturally significant landscape. The integrity of the California Desert Protection Act should be upheld by standing by its core values, including maximum protections for this magnificent land.

### **#4 ALLOWING OHV AT A PARK WITH STATE PARK CLASSIFICATION CONTRADICTS THE VERY DEFINITION OF THE PRIMARY GOAL OF A STATE PARK.**

**— References:** Chapter 4, EIR The Plan, Section 4.2, RRCSP Purpose & Vision, Section 4.2.1, Declaration of Purpose; Also Section 4.3.1, State Park Classification PRC 5019.53, (p.154 & p.157).

The VALUES established by State Parks for the unit classification of a STATE PARK is inconsistent with the allowance of any OHV activity in a state park. California Public Resources Code 5019.53 says that "The purpose of state parks shall be to preserve outstanding natural, scenic, and cultural values, indigenous aquatic and terrestrial fauna and flora, and the most significant examples of ecological regions of California, such as the ... desert.... 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. Improvements undertaken within state parks shall be for the purpose of making the areas available for public enjoyment and education in a manner consistent with the preservation of natural, scenic, cultural, and ecological values for present and future generations. ... 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."

State Recreation areas on the other hand, have specifically been classified as such in California Public Resources Code 5019.56, "...to provide outdoor recreational opportunities," as is the case with Onyx Ranch very recently established to the direct West of Red Rock Canyon State Park.

The unfortunate OHV allowances at Red Rock that have gone on for decades (due to the lack of adoption of a Revised General plan following the acquisition of additional acreage at the park) do not call for the continuance of activities that clearly do not align with Department Policy.



## TALKING POINTS

Red Rock Canyon is surrounded on three sides by Bureau of Land Management properties and the new Onyx Ranch State Vehicular Recreation Area, which allow liberal recreation, especially for vehicles. Onyx Ranch SVRA to the West of Red Rock includes 26,000 acres of "scenic and challenging terrain for all-terrain vehicles (ATV's), motorcycles, recreational OHV's, and 4X4 vehicles." The BLM Jawbone Canyon OHV area to the South of Red Rock consists of 5,132 acres. The BLM Dove Springs OHV area to the North of Red Rock consists of 3,935.8 acres **There is a total of over 35,000 acres of OHV terrain surrounding Red Rock on three sides.** Not to mention BLM's Spangler Hills OHV area to the Northeast of Red Rock which encompasses 95,219.6 acres.

With such opportunity next door, these values do not need to be duplicated within the sensitive confines of spectacular Red Rock Canyon State Park, nor are they permissible (under the classification of "state park.")

### **#5 TRAIL RIDING AND USE OF PRIMITIVE ROADS AS TRANSPORTATION CORRIDORS NOT ALLOWED UNDER GENERAL PLAN ADOPTED IN 1982**

**- References:** Chapter 1, Introduction, Section 1.2, Purpose of Land Acquisition, Also, Chapter 2, Existing Conditions, Section 2.4.1, Roads and Trails System, Access and Circulation (which also references Chapter 4, The Plan, Section 4.5.2) (p.23 & p.51), Red Rock Canyon State Park General Plan January 1982 (p. 24)

Non-street legal OHV's have been using Red Rock's primitive roads as a transportation corridor to get to and from open unrestricted OHV use areas owned and managed by the BLM (Jawbone Canyon to the southwest of Red Rock and Dove Springs to the northwest). Since the acquisition of additional acreage due to the Desert Protection Act in 1994, Red Rock has gone without a legal directive for the park as a whole. It is clearly stated in the General Plan adopted for Red Rock in 1982 that vehicle recreation is an "inappropriate use" under the "State Park" classification.

Transit use through the park to specifically utilize adjoining properties does NOT meet the criteria of use that engages with the enjoyment and inspiration of the park's resources and their values. Furthermore, the noise and dust from vehicles simply traveling through the park (sometimes in large numbers), while using the park simply as a connective route, can significantly "impair or detract" other park visitors "from the natural setting and quality of park uses determined to be of primary importance." As such, OHVs using the Park as a pass through to access vehicular recreation pastimes located on opposite sides of the park would be clearly defined as and determined to be an "Inappropriate Use" under the existing 1982 General Plan.

### **#6 OHV USERS ARE A SMALL FRACTION OF THE PARK VISITORS YET HAVE MAINTAINED A DISPROPORTIONATE INFLUENCE ON RED ROCK**

**- References:** Chapter 3, Issues & Analysis, Section



## TALKING POINTS

3.1.2.1: Regional Route Connectivity, (suggestion to add this discussion to Chapter 3, Issues & Analysis, as this point has not been adequately considered) (p.143).

The new nearby Onyx Ranch State Vehicular Recreation Area lacks facilities. Onyx Rangers and staff reside and operate out of Red Rock while the Red Rock appointed Rangers also appear to spend a very large amount of their time and resources on OHV activities, enforcement and medical. According to a study done by State Parks ten years ago but considered still valid, only 16.3 percent of park users use the park for OHV recreation while 27.5 percent come to Red Rock for recreation fitness including hiking, walking and running and a 38.8 percent of users go to the park to see the desert landscape.

**#7 THE THREAT OF ILLEGAL AND POTENTIAL RETALIATORY ACTIONS DOES NOT JUSTIFY ALLOWING OHV ACCESS.** - **References:** Chapter 5, EIR, Section 5.22.4.2, Cumulative Plans & Projects Considered in this Analysis, (p.146); Also, Section 5.23.2.2, Alternatives to the Proposed Plan (p.518)

The RRCIA does not support State Parks operating under an environment that is fear-based on the domineering activities of OHV in the park in the past several decades. The impact evaluation (5.23.2.2) conjectures in bold type that there will be “more extensive impacts” if Alternative 2 is adopted. Although it can be realistically envisioned that there will be a transition period from allowing restricted OHV in the park to having no visible activity of OHV in the park, this needs to be addressed by allocating more resources to monitoring and enforcement. Eventually years from now, illegal activity will diminish and hopefully decades from now will cease to exist.

**#8 PROPOSED EXEMPTION FOR OPEN ACCESS FOR PEDESTRIANS AND HIKERS TO EXPLORE TERRAIN UNINHIBITED** -**References:** Chapter 4, The Plan, Table 4-1, Management Zone Uses; Also Section 4.6.1 Parkwide Goals & Guidelines, Section 4.6.1.1 Visitor Experiences & Recreational Opportunities; -Allowable Use & Intensity, -Recreation, -Hiking (p.189-197)

Off-Trail Use Restrictions for Preserves and Reserves were adopted by State Parks a few years ago (California Code of Regulations Section 4325) whereby no person shall leave trails or board walks in Natural Preserves, Cultural Preserves, State Cultural Reserves, or State Natural Reserves within the California State Park System, unless approved by the Department. Specifically, the proposed regulations would prohibit all public use in these areas unless such use is on a trail or boardwalk.

We support trail restrictions for most of the Reserves and Preserves throughout California State Parks but we must all recognize that Red Rock Canyon State



## TALKING POINTS

Park is an extremely unique case study and that these regulations would severely impact the quality of our park's existing visitor use experience. While well founded elsewhere, a blanket policy whereby no visitors could leave trails would exclude visitors parked at Red Cliffs from crossing the rock barrier hemming in vehicles to approach and interact with Red Cliffs. We also want to encourage and allow educational ventures such as geology classes, field trips by paleontologists and flora and fauna aficionados as well as artists to continue to have access, use and enjoy the spectacular landscape up close.

No one previously envisioned such a restriction on movement within Red Rock Canyon. Preserve designations remains an important tool of course. These codify that sensitive resources exist, however, they were never envisioned to restrict visitor use in such a dramatic way.

We are asking that an exception be built in to the General Plan for Red Rock that would allow pedestrian use off-trail in the Preserves at Red Rock Canyon State Park to allow the landscape to continue to be one of exploration, adventure and awe for generations to come.

In CCR Section 4325 - Title 14, Division 3, Chapter 1 Section 4325 Off Trail Restrictions – Preserves and Reserves Section b reads, "Notwithstanding (a) the entirety of portions of Natural Preserves, State Cultural Reserves, or State Natural Reserves may be open to off-trail access:

- (1) On routes of travel that have been shown in a general plan or management plan or adopted in a similar process;
- (2) In an area that has been designated open for off-trail use by the park unit's general plan or a specific management plan.
- (3) Or, on a route of travel or in an area that the District Superintendent designates open for off-trail use by posted order after determining that off-trail use is important for public access and where it has been determined that impacts to the resources for which the park unit was established will not be significant.

**NOW IS THE TIME TO ENACT CCR 4325'S ALLOWANCE OF OFF-TRAIL HIKING TO CONTINUE THE LONGSTANDING PUBLIC PATTERN OF THE ENJOYMENT OF RED ROCK CANYON STATE PARK. IT IS CRITICAL FOR THE VISITOR'S QUALITY OF EXPERIENCE TO WRITE AN EXCEPTION TO THIS CODE FOR RED ROCK CANYON STATE PARK.**

### **#9 SIMILAR DESERT STATE PARKS SHOULD BE MANAGED IN A COMPARABLE FASHION**

**- References:** None specifically found in the GPR or EIR. Could review Chapter 1, Introduction, Section 1.3, Character and Spirit, Section 1.4, Purpose and Need for the General Plan Revision (p. 24 to 30); Also Chapter 2, Existing Conditions, Section 2.6, Significant Resources. (p.70 to p.129).



## TALKING POINTS

It is logical to expect that, within California State Parks, parks that bear similar resources and similar sensitivities should be managed in a similar fashion. Since the 1982 General Plan for Red Rock Canyon, perhaps 10 species new to science have been identified from within or adjacent to the park. More locally endemic plants and animals have also been discovered. Field research and archival studies have flourished providing volumes of new information about the sensitivity as well as the impressive biologic, cultural, geological, and paleontological resources of this park. Documentation has also occurred regarding certain recreational impacts.

The known resources of Red Rock Canyon are on a par with those documented for Anza Borrego Desert State Park. Anza Borrego accomplished its General Plan in 2005. The State Parks General Planning Handbook states "General planning considers the unit within the larger context of the State Park System, using and referencing statewide plans already in place" (page 18). Unless very specific and detailed objections can be raised, Anza Borrego's General Plan should be a strong model for Red Rock Canyon's General Plan Revision.

MAPS of the Proposed Concepts including Concept4 which is now referred to as Alternative 2 (along with the definitions of park classifications) can be found [here](#).