

**#15-1** California State Parks (CSP) recognizes that many of the Park's users share the same appreciation and desire to preserve the spectacular scenery and landscape of ABDSP. This common interest was expressed by nearly every visitor user group at the public meetings held during the development of the General Plan. CSP further recognizes the positive health and social benefits that stem from outdoor activities. The Preferred Alternative of the General Plan combines elements from the three alternatives presented during the planning process to protect the resources that are appreciated by the public while providing public access and education at ABDSP.

Comments on the Anza-Borrego Desert State Park  
Preliminary General Plan & Draft Environmental Impact Report  
Sch # 2002021060

September 9, 2004

Ms. Tina Robinson  
Environmental Coordinator  
Southern Service Center  
California Department of Parks & Recreation  
8885 Rio San Diego Drive  
San Diego, CA 92108

Dear Madam;

Please accept the following comments on behalf of the organizations listed on the following pages. The organizations listed on the signature page represent literally thousands of individuals that seek recreational experiences in Anza-Borrego Desert State Park (ABDSP).

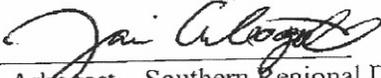
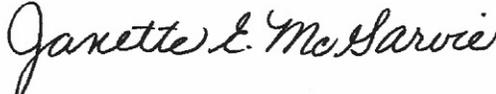
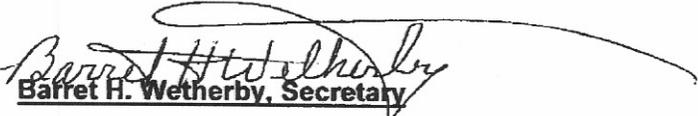
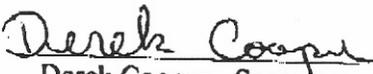
We recognize the importance of the positive health and social benefits that stem from outdoor activities. We recognize the signature value of Anza-Borrego Desert State Park as an outdoor recreation destination that is world renown. We appreciate the vision of our forefathers that conserved this magnificent scenery and spectacular landscape for the benefit of this and future generations.

The members of the listed organizations are devoted to the following concepts;

1. Public access to ABDSP for their children and grandchildren
2. Maintaining the condition and safety of the environment
3. Sharing the magnificent examples of our natural, historic, and cultural heritage

We used these concepts in reviewing the General Plan (GP) and Draft Environmental Impact Report (DEIR).

Comment Letter 15 – Combined CARE letter

 <p>Jim Arbogast – Southern Regional Dir. California Off Road Vehicle Association</p>	 <p>Janette McGarvie, Director of Legislation San Diego Off-Road Coalition</p>
<p><b>Americans For Forest Access</b></p>  <p>Eddie Phillips Board Chairman</p>	 <p>Dick Bergeron, President Mountain Coalition</p>
 <p>Chris Vargas The Warrior's Society</p>	 <p><u>Barret H. Wetherby, Secretary</u></p> <p><u>Public Lands for the People, Inc.</u></p> <p><u>Date this day September 5, 2004</u></p>
 <p>Derek Cooper - Secretary High Desert Multiple Use Coalition</p>	 <p>Candace D. Oathout, Chair Citizens Against Recreational Evection - USA</p>
 <p>Les Levie, President Back Country Horseman of California, Borrego Springs Unit</p>	 <p>Dick Bergeron, President Coachella Valley Trails Council</p>

Comment Letter 15 – Multiple Organizations

 Del Albright, Trail Boss Friends of the Rubicon (FOTR)	 Richard R. Moon President, JEEPING JEEPERS JEEP CLUB INC.
 Nola Michel Co-President Backcountry Horsemen of California Caballeros del Sol Unit	<p><b>ABDSP General Plan/EIR Comments Signature Page</b></p> <p><b><u>Bob Sackett</u></b></p> <p><b>Bob Sackett, District Legislative Officer</b></p> <p><b>AMA District 37, Dual Sport, Board of Directors</b></p>

**Wm. R. Seymour**  
**35566 Shane Lane**  
**Calimesa, California 92320**

September 6, 2004

As a resident of Southern California, I am a very frequent visitor to many of our area's recreational destinations. Among the hundreds of locations offering a quality outdoor experience, my very favorite is Anza-Borrego Desert State Park.

I have had the pleasure of visiting ABDSP on dozens of occasions over the past 20 years. I have experienced the varied recreational opportunities in this park during every season. It has been my pleasure see and enjoy nearly every facet of this wonderful park. I have done so while hiking on foot, riding a motorcycle, and driving a truck.

Each method of transport has its advantages. This is why it is vitally important to keep all means of access available to all responsible visitors. That is why I agree with the comments on the *Anza-Borrego Desert State Park Preliminary General Plan & Draft Environmental Impact Report (Sch #2002021060)*, as submitted by *Candace Oathout* in her letter dated *September 3, 2004* and addressed to *Environmental Coordinator, Southern Service Center, California Department of Parks & Recreation*.

This letter will certify that I support and endorse every finding and recommendation contained in Ms. Oathout's letter. Please consider this input equally with every other response you receive in this matter.

Sincerely,

*Wm. R. Seymour*

Comments on the Anza-Borrego Desert State Park  
Preliminary General Plan & Draft Environmental Impact Report  
Sch # 2002021060

September 8, 2004

Environmental Coordinator  
Southern service Center  
California Department of Parks & Recreation  
8885 Rio San Diego Drive  
San Diego, CA 92108

Dear Sir or Madam;

Please accept the following comments on behalf of the organizations listed on the following page. The organizations represent individuals that seek recreational experiences in Anza-Borrego Desert State Park (ABDSP).

We recognize the importance of the positive health and social benefits that stem from outdoor activities. We recognize the signature value of Anza-Borrego Desert State Park as an outdoor recreation destination that is world renown. We appreciate the vision of our forefathers that conserved this magnificent scenery and spectacular landscape for the benefit of this and future generations.

The members of the listed organizations are devoted to the following concepts,

1. Public access to ABDSP for their children and grandchildren
2. Maintaining the condition and safety of the environment
3. Sharing the magnificent examples of our natural, historic, and cultural heritage

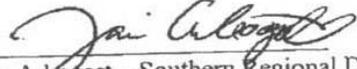
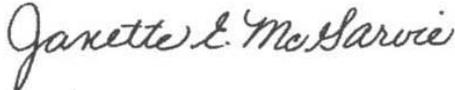
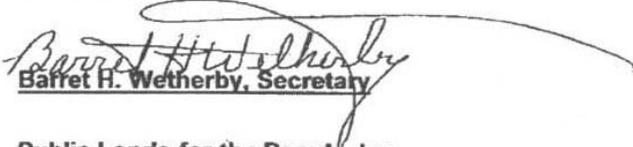
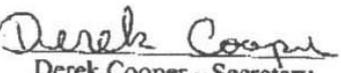
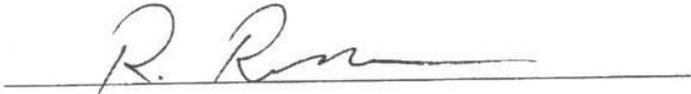
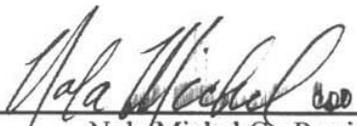
We used these concepts in reviewing the General Plan (GP) and Draft Environmental Impact Report (DEIR).

Respectfully submitted,



Dave Harlan  
OC Dualie & D-37 Rider Representative  
5607 Ave Antigua  
Yorba Linda, CA 92887  
PH # 714-693-1401  
Fax # 714-701-0629  
E-Mail OCDualie@aol.com

Comment Letter 15 – Signatures

 Jim Arbogast – Southern Regional Dir. California Off Road Vehicle Association	 Janette McGarvie, Director of Legislation San Diego Off-Road Coalition
Americans For Forest Access  Eddie Phillips Board Chairman	 Dick Bergeron, President Mountain Coalition
 Chris Vargas The Warrior's Society	 <u>Barret H. Wetherby, Secretary</u> <u>Public Lands for the People, Inc.</u> Date this day <b>September 5, 2004</b>
 Derek Cooper - Secretary High Desert Multiple Use Coalition	 Candace D. Oathout, Chair Citizens Against Recreational Evection - USA
 Les Levie, President Back Country Horseman of California, Borrego Springs Unit	 Dick Bergeron, President Coachella Valley Trails Council
 Del Albright, Trail Boss Friends of the Rubicon (FOTR)	 Richard R. Moon President, JEEPING JEEPERS JEEP CLUB INC.
 Nola Michel Co-President Backcountry Horsemen of California Caballeros del Sol Unit	ABDSP General Plan/EIR Comments Signature Page  <u>Bob Sackett</u> Bob Sackett, District Legislative Officer AMA District 37, Dual Sport, Board of Directors

**Wm. R. Seymour**  
**35566 Shane Lane**  
**Calimesa, California 92320**

Comments on the Anza-Borrego Desert State Park  
Preliminary General Plan & Draft Environmental Impact Report  
Sch # 2002021060

September 6, 2004

As a resident of Southern California, I am a very frequent visitor to many of our area's recreational destinations. Among the hundreds of locations offering a quality outdoor experience, my very favorite is Anza-Borrego Desert State Park.

I have had the pleasure of visiting ABDSP on dozens of occasions over the past 20 years. I have experienced the varied recreational opportunities in this park during every season. It has been my pleasure see and enjoy nearly every facet of this wonderful park. I have done so while hiking on foot, riding a motorcycle, and driving a truck.

Each method of transport has its advantages. This is why it is vitally important to keep all means of access available to all responsible visitors. That is why I agree with the comments on the *Anza-Borrego Desert State Park Preliminary General Plan & Draft Environmental Impact Report* (Sch #2002021060), as submitted by Candace Oathout in her letter dated September 3, 2004 and addressed to *Environmental Coordinator, Southern Service Center, California Department of Parks & Recreation*.

This letter will certify that I support and endorse every finding and recommendation contained in Ms. Oathout's letter. Please consider this input equally with every other response you receive in this matter.

Sincerely,



September 8, 2004

Environmental Coordinator  
Southern service Center  
California Department of Parks & Recreation  
8885 Rio San Diego Drive  
San Diego, CA 92108

Dear Sir or Madam;

Please accept the following comments on behalf of the organizations listed on the following page. The organizations represent individuals that seek recreational experiences in Anza-Borrego Desert State Park (ABDSP).

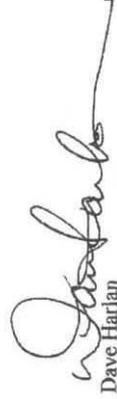
We recognize the importance of the positive health and social benefits that stem from outdoor activities. We recognize the signature value of Anza-Borrego Desert State Park as an outdoor recreation destination that is world renown. We appreciate the vision of our forefathers that conserved this magnificent scenery and spectacular landscape for the benefit of this and future generations.

The members of the listed organizations are devoted to the following concepts;

1. Public access to ABDSP for their children and grandchildren
2. Maintaining the condition and safety of the environment
3. Sharing the magnificent examples of our natural, historic, and cultural heritage

We used these concepts in reviewing the General Plan (GP) and Draft Environmental Impact Report (DEIR).

Respectfully submitted,



Dave Harlan  
OC Dualie & D-37 Rider Representative  
5607 Ave Antigua  
Yorba Linda, CA 92887  
PH # 714-693-1401  
Fax # 714-701-0629  
E-Mail OGDualie@aol.com

Comments on the Anza-Borrego Desert State Park Preliminary  
General Plan & Draft Environmental Impact Report  
(Sch # 2002021060)

Signature Supplement  
September 10, 2004

Additional persons and organizations that wish to voice their support for the Comments on the Anza-Borrego Desert State Park Preliminary General Plan & Draft Environmental Impact Report (Sch # 2002021060). Unfortunately their information arrived after the full document went to press; therefore their support is listed in this supplement. Please consider them a full partner in this effort.

Respectfully Submitted,



Candace D. Oathout, Chair  
Citizens Against Recreational Evecion - USA

**OUT FOUR FUN  
4 WHEEL DRIVE CLUB**

A member of the California Association Of 4 Wheel Drive Clubs

September 9, 2004

Candace Oathout  
7441 S. Rich Way  
Salt Lake City, Utah 84121

Candace;

I am the Vice-President and Environmental Affairs Chairman for the Out Four Fun 4 Wheel Drive. On behalf of the club would like to go on record in support of the Multiple Use and Recreation comments for the Anza-Borrego State Park.



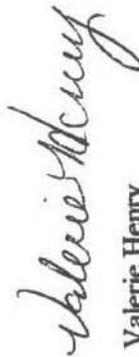
David G Henry  
Vice-President, Environment Affairs Chairman,  
Out Four Fun 4 Wheel Drive Club.  
967 Knoll St.  
Devore, Ca.92407  
909-880-9030  
dgh4@earthlink.net

September 9, 2004

Candace Oathout  
7441 S. Rich Way  
Salt Lake City, Utah 84121

Candace:

As the South District Individual Member Representative of the California Association of 4 Wheel Drive Clubs, I represent approximately 700 Individual members in our organization. I would like to go on record in support of the Multiple Use and Recreation comments for the Anza Borrego Desert State Park.



Valerie Henry  
CAWDC, South District Individual Member Representative  
967 Knoll Street  
Devore, Ca. 92407  
909-887-3960  
valhenry@cal4wheel.com



John Stewart  
Natural Resource Consultant  
California Association of 4  
Wheel Drive Clubs

Comment Letter 15 – Signatures

September 12, 2004

Jim Suty, President  
3019 Archwood Circle  
San Jose, CA 95148  
408-242-7354  
E-mail: [jim@oceanodunes.org](mailto:jim@oceanodunes.org)  
[www.oceanodunes.org](http://www.oceanodunes.org)



Tina Robinson  
Environmental Coordinator  
Southern Service Center  
California Dept. of Parks & Rec.  
8885 Rio San Diego Dr., Suite 270  
San Diego, CA 92108

Re: Public comments for: ABDSP Preliminary GP/EIR (Sch#2002021060)

Dear Ms. Robinson

  
Jim Suty – President  
Friends of Oceano Dunes

Attached are signatories to the comments on ABDSP Preliminary GP/EIR (Sch#2002021060) previously submitted by Citizens Against Recreational Eviction – USA, et al. These signatories also feel the proposed ABDSP Prelim General Plan & Draft EIR is seriously flawed and defective. They, as all the other signatories, demand it be pulled from consideration until it is completely rewritten and resubmitted for public review.

Very Respectfully,

Candace D. Oathout, Chair  
Citizens Against Recreational Eviction – USA

---

Friends of Oceano Dunes is a 501(c)(3) California Not-for-Profit Public Benefit Corporation, comprised of over 27,000 members. We represent businesses, environmentalists, equestrians, campers, fishermen, families and off-road enthusiasts who enjoy the benefits of Public Access through Responsible Recreation at the Oceano Dunes State Vehicular Recreation Area (ODSVRA). We want to maintain Access For All!

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

September 12, 2004

Dear Sir or Madam,

I feel the proposed ABDSP Prelim General Plan & Draft EIR is seriously flawed and defective. I demand it be pulled from consideration until it is completely rewritten and resubmitted for public review.

I concur with those recommendations, plan changes, and concerns as outlined and detailed in the report submitted by Citizens Against Recreational Eviction – USA, et al.

Respectfully Submitted,



Michael Arbogast  
4922 Marion Ave.  
Cypress, CA 90630

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

September 12, 2004

Dear Sir or Madam,

I feel the proposed ABDSP Prelim General Plan & Draft EIR is seriously flawed and defective. I demand it be pulled from consideration until it is completely rewritten and resubmitted for public review.

I concur with those recommendations, plan changes, and concerns as outlined and detailed in the report submitted by Citizens Against Recreational Eviction – USA, et al.

Respectfully Submitted,



Brian Hawthorne  
Public Lands Director  
Blue Ribbon Coalition

**#15-2** Please see Response # 6-11 regarding the Coyote Canyon Closure. Additionally, the historical significance of the Fages/Anza Trail lies within the historical context as an exploration, settlement, and transportation route pioneered by Spanish Colonials marching from Sonora to found the presidio and town of San Francisco. Lt. Pedro Fages and Lt. Col. Juan Bautista de Anza led three expeditions between 1771 and 1776.<sup>1</sup> Historical scholarship of the Anza Expedition does not give any indication that the Expedition was a recreational activity but one of pioneering Euro-American settlement and exploration of California. The trail's period of historic significance dates from 1772 to 1844. The Sonora Road to the south eventually replaced it as a major overland route between Northern Mexico and Alta California. The Civilian Conservation Corps-built improvements may be potentially historic features in themselves, but should not be regarded as a mandate to open the trail to motorized vehicular traffic. The overriding issue is what impact would modern-day modes of transportation and public use have on these historic resources.

**#15-3** Please see Response #6-11. Additionally, neither Riverside County nor San Diego County raised this as an issue under the General Plan public review period.

**#15-4** This study was a scientific study and not subject to public review under CEQA. Please also see Response #2-4.

---

<sup>1</sup> National Register of Historic Places. National Register Information System. "Fages-De Anza Trail-Southern Emigrant Road." [http://www.nr.nps.gov/iwisapi/explorer.dll?IWS\\_SCHEMA=NRIS1&IWS\\_LOGIN=1&IWS\\_REPORT=100000044](http://www.nr.nps.gov/iwisapi/explorer.dll?IWS_SCHEMA=NRIS1&IWS_LOGIN=1&IWS_REPORT=100000044).

Comments on the Anza-Borrego Desert State Park  
Preliminary General Plan & Draft Environmental Impact Report  
Sch # 2002021060  
September 9, 2004

15-2 As we have reviewed the Preliminary General Plan (GP) & Draft Environmental Impact Report (DEIR) we have found many areas of concern. First and foremost, this document is fatally flawed in that it does not follow the rule of law that established the Park. The original deed of transfer from the Department of the Interior, Bureau of Land Management, to the California State Parks under the provisions of the 1933 Congressional Act provided for the section of certain lands for the use of the California State Park System. The deed was subject to valid existing rights on the date of said act and upon express condition that the lands hereby granted must be used by the State of California for state park purposes. The closure of the Juan Batista De Anza National Historic Trail and road through Coyote Canyon clearly violates these provisions. The road through Coyote Canyon is an established route that had been in continuous use by the public for recreation from at least the 1700's when the Spanish explorer for whom the National Historic Trail was named used it to find his way north to what is now San Francisco. This trail alignment was used as a principal way for immigrants, settlers and later farmers and ranchers to travel from the southeastern portion of the desert to the northwestern portion. In 1933 and 1934 the Civilian Conservation Corps graded and improved the road through Coyote Canyon. It had been in continuous use until 1995 when the California Department of Parks and Recreation (CDPR) closed a 3.1 mile section on the grounds of environmental impact. The Coyote Canyon Road still follows the same route that it did beginning in the 1700's.

15-3 When Senator Bill Morrow requested a legislative review of the Coyote Canyon situation from Diane F. Boyer-Vine, Legislative Counsel for California, he received the following response dated April 20, 2004. Coyote Canyon Road fits the criteria of a road under the RS2477 Statute. That CDPR did not have the authority to close a 3.1 mile section of the road as they did in 1995 and that CDPR's decision to close the road for environmental reasons is not a valid reason under state and county statutes. Even if this was a valid reason for closure, CDPR does not have jurisdiction to close the road because the County of San Diego has not relinquished its jurisdiction of this public route to the Department of Parks and Recreation.

15-4 The assessment of ecological conditions issued by researchers from the Wildlife Health Center in 2002 entitled "Ecological Conditions in Coyote Canyon: Anza-Borrego Desert State Park: An Assessment of the Coyote Canyon Public Use Plan was used without public review to justify continued closure of the Canyon to motor vehicles and further to support and justify assumptions and decisions reflected in the Revised General Plan & Draft Environmental Impact Report.

**#15-5** Specific resource evaluations are prepared by trained professionals and subjected to scrutiny by peer review. Such evaluations are often prepared for documents, such as an EIR, that are public review documents. Scientific findings are determined to have validity based on the study methodology and expertise of the professionals preparing the study. The Ecological Conditions in Coyote Canyon, July 2002 was conducted by UC Davis, an institution with high credibility in natural resource analysis.

CSP agrees with your assessment that “it is entirely possible that the changes noted occurred due to the cumulative effects of both actions.” The Coyote Canyon Public Use Plan addresses multiple issues. It is our belief that management actions, specifically as outlined in PUP, directed toward these multiple issues has resulted in increased ecosystem integrity and recreational value for this region of the Park. CSP would also like to restate that the Coyote Public Use Plan was approved in 1995 and the approval of the GP/EIR does not propose to change that condition.

**#15-6** Many of the visitors surveyed were in fact, operating motorized vehicles when they entered Coyote Canyon. Most visitors to Coyote Canyon do enter the canyon in motor vehicles. A similar survey, performed parkwide, found that increasing access to the park by motor vehicles is one of the least desired changes visitors wanted. They are for the most part, seeking solitude and quiet, not mechanical noise and more vehicular access.

**#15-7** The Assessment clearly states that “Both management actions and natural phenomena may have influenced the distribution and abundance of least Bell’s vireo in Coyote Canyon during the monitoring period.” CSP agrees with this point. Also, please consider the idea that numerous vehicles, repeatedly driving within the surface waters, on the stream bed and banks through a desert oasis not only directly but, also when interacting with higher flows, has the potential to affect the “niche availability” for least Bell’s vireo.

Regarding the ecological recovery of Middle Willows, please consider the following: With the removal of vehicle traffic from this oasis, vehicle-related erosion and channel incision was halted. The affects of incising a channel are well known to affect stream hydrology, and specifically, the diversity of channel braiding. Variable channel braiding contributes to a mosaic of microhabitats within the system. This diversity of habitat, especially when expressed as variable-age stands of riparian vegetation, are important factors for promoting species diversity, including an increased assurance that suitable habitat for least Bell’s vireo will always be present to some degree. This is important to consider, as the mention of “short term gains” seems to indicate a failure to consider the existence and importance of diversity within a particular oasis, and the negative effects that result from repeated and continual disturbance of OHV in that oasis. This also addresses the earlier concern for vireo “niche availability.” Please also see comment #6-15.

CSP ecologists do not believe that allowing a herd of feral horses to “churn up the creek bottom” constitutes responsible stewardship of this sensitive habitat.

Comment Letter 15 – Multiple Organizations

15-5 We object to the use of this document because it has not been submitted for public review and it does not legally support CDPR’s closure policy nor provide best management practice, guidance for CDPR policy. Although the Assessment claims to analyze the ecological effects on Coyote Canyon on a “before and after basis” with regard to the removal of Off Road Vehicle traffic through the Canyon, the Assessment lacks adequate pre-closure data to compare with post-closure conditions. The Assessment is not based on replicated studies with a consistent baseline; it is rather based on “snapshot” observations made years after the Canyon was closed. The Assessment does not isolate the removal of Off Road Vehicles from other restoration projects that were implemented at the same time to improve the ecology of the Canyon. It is impossible to determine whether tamarisk removal or closure of the Canyon is more responsible for the return of so-called native vegetation growth in the Canyon. The study does not indicate whether any soil tests were conducted to determine salinity changes that would have been caused by tamarisk removal from the Canyon. It provides no data showing the extent to which tamarisk removal as opposed to Canyon closure may have contributed to ecological changes in the Canyon and Creek. It is entirely possible that the changes noted occurred due to the cumulative affects of both actions. Or that both actions worked interactively to create the changes noted in the Assessment.

15-6 The Assessment is severely deficient in that it does not accurately measure the recreational value of Coyote Canyon. The surveys conducted to determine visitor responses as they entered the closure area where conducted after the Canyon was closed to vehicles. Therefore the information collected is strongly biased against vehicle use in the Canyon. The visitors surveyed represented only those folks who were not disposed to visit the Canyon via motorized transportation. Any visitor surveys conducted must be designed and managed to obtain feedback from all user groups.

The Assessment also makes an extrapolation that closure of the Canyon resulted in larger numbers of Least Bell’s Vireo. In the aftermath of the 1993 floods, no Least Bell’s Vireo observed at Lower Willows as their preferred habitat had been destroyed. The re-growth of habitat combined with tamarisk removal would certainly account for the perceived increase in Vireo. Experience in other areas, such as, the Tijuana River Valley, indicates that vehicle traffic has little impact on this species when their habitat niche is available.

15-7 The aerial photographs included in the Assessment demonstrate the channel and vegetation changes that are to be expected in a braided river channel as a result of the preceding rainy season. While even the untrained eye can measure the amount of vegetation growth on a closed roadbed, it is not a significant measure of the recovery of the ecosystem. It is the very common response of a predominately dry, sandy creek bottom. The short-term gains in habitat for Least Bell’s Vireo are exactly that, short-term. As the riparian corridor matures it will become less valuable to Vireo, but will encourage other species. It is not surprising that the Southwest Willow Flycatcher has not been found in Coyote Canyon. According to the most recent research by Forest Service biologists in Arizona the Flycatcher is most attracted to a slack water slough ecosystem. While not impossible to develop and maintain in Coyote Canyon, it is much more difficult in the arid conditions and ephemeral or intermittent water flows in Coyote

**#15-8** CSP respectfully disagrees. Please see Responses #2-2, 2-4, 2-5, and 2-6. Additionally, there is no legal precedent that says a historic activity has to be continued in order for a historic resource to remain historic. There are many examples of historic buildings, listed on the National Register of Historic Places that have been adapted from their original to modern use.

**#15-9** As stated in Section 3.2.4, management zones are provided to describe the overall management purpose and intent of specific regions within the Park as well as depict their intended uses under the General Plan. All zones are governed by the direction provided through PRC 5019, which also defines a park. The Wilderness Zone and Cultural Preserve Zone coincide with the classification for State Wilderness and Cultural Preserve. The remaining management zones are consistent with allowable uses in the State Park classification. The classifications are consistent across all state parks whereas the management zones are specific to individual parks based upon their General Plans. A management zone in a State Park would be used in the same way that local agencies utilize zoning to direct uses in a compatible way within their jurisdiction. Changes in classification must be approved by the State Park and Recreation Commission. The Backcountry Zone was created specifically for the General Plan to allow visitor access and open camping while protecting the resources (See Response #15-1) so important to the public. As is evident with the many State Park classifications (PRC 5019), the uses, and layout of state parks can be quite varied as is appropriate since State Parks are acquired to preserve the unique characteristics of California's cultural and natural heritage. Urban parks, such as that described by quote from Black's Law Dictionary, are quite different from the vast landscape present in ABDSP, and serve a different purpose.

**#15-10** Wilderness designations in 1974 and 1982 brought very few road closures to the visitors of Anza-Borrego. In fact, most wilderness areas were carefully plotted on the maps to conform to roadways and access points. It is a common misconception that Wilderness closes visitors off from enjoying the park. The Biosphere Reserve program invited CSP to join the program in the 1980s and the benefits to the people of California have been increased communications with other large desert parks in managing resource issues. Other desert areas in the Southwest and in Baja California have benefited from the program by consulting ABDSP staff for information and resource management projects conducted in Anza-Borrego. The State Park and the International Biosphere Reserve Program has increased good communications between parks such as Death Valley, Joshua Trees, Organ Pipe, and the Vizcaino Desert in Baja California, Sur.

**#15-11** CSP respectfully disagrees. During the General Plan public meetings, many members of the public indicated that they enjoyed ABDSP because of its remoteness, solitude and desert vistas. The General Plan seeks to preserve these values for future generations and thus ensure that "high quality" recreation endures at ABDSP. Wilderness at ABDSP will be increased by 14% in roadless areas. CSP fails to see how this increase "condemns the average Park Visitor to the concentrated conditions of the Focus Use Zones." Please see Response # 6-24.

Comment Letter 15 – Multiple Organizations

- 15-7  
(cont'd) Creek. Especially after several years of drought conditions. Removal of the Wild Horse herd that tended to churn up the creek bottom in ways that would cause water to pool up and or flow slowly will likely have a negative impact on Willow Flycatcher habitat.
- 15-8 The conclusions that the Assessment makes regarding the effectiveness of management changes under the Public Use Plan are overstated, not supported by scientific studies or data, and are ultimately unfair to Park visitors by removing an historic Park use and severely limiting access to an important area of the Park.
- All the documentation provided by Park Land Managers to support their determination to close this area to OHV traffic is flawed and does not legally support the need to close the Canyon.
- 15-9 We strongly object to the proposed new zoning designations. They are not supported by legislation and they are not clearly defined in quantifiable terms. According to the State Park and Recreation Commission, Statements of Policy as amended on May 4, 1994 land acquired for the use and enjoyment of the of the people is statutorily classified as (a) Wilderness; (b) State Reserves, (c) State Parks; (d) State Recreation Units; (e) Historical Units; (f) Natural Preserves; (g) Cultural Preserves; (h) State Beaches; (i) State Seashores; (j) Trails; and (k) Wayside Campgrounds. Anza-Borrego Desert State Park was established as a “park” which is defined in Black’s Law Dictionary as “an enclosed pleasure ground in or near a city, set apart for the recreation of the public”. How does the California Park Service define a “park? What are the differences in management policies for the different classifications? What is the statutory authority for changes in classifications? We have not found a statutorily supported definition of the proposed “Backcountry Zoning”; therefore we request that this designation be removed from the document. It does not have a legal definition or legal status that we can verify. If there are, in fact, additional designations to those enumerated above, please provide the sources for them.
- 15-10 How can Park Managers justify accepting the designation of the ABDSP as a Biosphere Reserve in 1985? The Park clearly does not meet the traditional criteria for the establishment of a biosphere reserve, as these reserves contain strictly protected areas surrounded by buffer and transition zones where a range of human activities is permitted. Under the ideal model of such a reserve, a core zone is established at the center and preserves genetic materials and minimal habitat to maintain biological diversity. In ABDSP this model is reversed with the developed area of Borrego Springs at its center. The current PGP and DEIR attempt to support the Biosphere Reserve agenda that is in direct conflict with the stated vision and mission of ABDSP. Changing the definition of **high-quality recreation** to recreation that is dependent on the “high-quality” of the natural and cultural resources within a State Park is completely unacceptable. It represents the abandonment of the overriding principle of enabling visitors to enjoy the Park. It is impossible for visitors to enjoy the Park if they can not access over two-thirds of it that are managed under State Wilderness designation. ABDSP contains not only some of the most intriguing and beautiful landscapes in California, it also contains some of the harshest and least forgiving landscapes in the Park system.
- 15-11

**#15-12** Please see Response #15-10. CSP believes that the public does have the right to access Wilderness under the General Plan, so there is no violation of the original deed transfer. In addition to providing recreational opportunities, CSP is also charged with sustaining the Park resources such that the park will be preserved in its natural state so future generations might enjoy its qualities. The only portion of the park closed to the public is the Carrizo Impact Zone with is closed for public safety due to unexploded ordnance on the site (the site was formerly used as a military bombing range).

**#15-13** CSP agrees that the General Plan must have clearly definable standards for management to follow. However, the General Plan must also act as a guiding document for a long period of time and, by necessity, include terms that guide planning concepts. A term such as “the potential to” is entirely applicable and concise when placed in the context of causing adverse impacts to any number of resources at ABDSP, including recreational resources.

**#15-14** CSP respectfully disagrees. Please see Response # 15-13. It is possible that a lizard discovered at ABDSP may only exist at that site because of the Park’s extreme biological diversity and quality of habitats. It may also be true that it was discovered at ABDSP simply because the Park is the site of many ecological studies conducted by both Park ecologists and scientists from around the world. The General Plan creates Goals and Guidelines that, by their very nature, are used as planning concepts that address a broad range of issues. For example, the Goal Biota 1 addresses the protection of all native biota at ABDSP.

Many aspects of the natural and cultural resources in this region have been given significant scientific attention and support the level of management detail proposed in this General Plan. Arguably, more so than anybody, park managers understand feelings of frustration that arise from a lack of scientific data. It is CSP’s responsibility to manage this land; we do so with the best available knowledge, our professional expertise and experience, a love for parks, and respect for the CSP Mission.

15-11  
(cont'd)

The average visitor is not equipped physically or mentally to take on the challenge of backpacking or hiking through miles of Wilderness in the extreme conditions found on the desert. This unfairly condemns the average Park visitor to the concentrated conditions of Focus-Use Zones that will lead to more crowding, fewer high-quality recreational experiences and more perceived negative impacts on the resources. This is a self destructive cycle that will diminish the mission of ABDSP to be *the premier park in California...inspiring and educating park patrons and serving the needs of the public that are consistent with park objectives...* unless the park objectives are to completely deny the public the opportunity to experience the park.

15-12

The deed patent that transferred land from the Bureau of Land Management to the State of California reserves to the United States, its permittee or licensee the right to enter, occupy, and use any part or portion thereof. The 1974 proposal by staff to designate the Santa Rosa Mountains State Wilderness is in violation of the original deed transfer.

The loss of access through the establishment of Wilderness designations upon lands transferred to California State Parks from the Bureau of Land Management clearly violates this provision of the deed transfer. The fiduciary duty of the Park Service is to “preserve the park in its natural state so future generations might enjoy its intrinsic qualities.” Enjoyment of the Park’s intrinsic qualities necessarily indicates the public’s right to access them. Conservation, not preservation, of the public resources, and access to the cultural, natural, and historic resources has legal standing.

15-13

We find that the authors of this document have used many words and phrases that lack a clear definition and are not quantifiable. A General Plan covering a land mass as large as ABDSP must provide clearly definable standards that provide clear understandable measures of the impacts of management planning under this document. Terms, such as, has the potential to, may have, integrity of, are too vague and subjective. Terms used in a document such as this must be quantifiable.

### Introduction

#### Page 3

15-14

The document states, "The GP/EIR provides discussion of **THE PROBABLE IMPACTS** of future development & established goals., polices..... We strongly object to this huge sweeping generalization as it is unsubstantiated and cannot be quantified without facts & specifics. For example, there is a statement regarding a newly discovered lizard that is only known from ABDSP. This does not mean this species is endemic to the Park. It just means it hasn't been seen elsewhere yet. The use of vague terms like, “has the potential to, may impact, and could be harmful to” or other similar comments are too broad and subjective. These comments must be supported by scientific studies. Park managers have had many opportunities to perform scientific studies that would support their claims since the Park was formed in 1933.

#### Page 4

15-15

The third paragraph says, “The plan specifically envisions that a series of Focus Management Plans...be prepared subsequent to the adoption of the General Plan.”

## California State Parks Response

**#15-15** CSP respectfully disagrees. Please see Response #6-9. Additionally, the Goals and Guidelines of the General Plan contain the criteria, at a program level, upon which the Management Plans will be based. The Management Plans will be available for public review in compliance with the CEQA Guidelines and CSP Department Operations Manual. It is not anticipated that the goals and objectives outlined in the General Plan will have a significant adverse effect on existing recreation or facility development. Nor will there be a substantial effect on economies based on the limited development proposed in Table 5.8.

**#15-16** CSP respectfully disagrees. CEQA does not require an analysis of economic impacts and the EIR addresses the potential recreational effects of the General Plan. Please see Response #s 6-7 and 15-9. The commenter indicates that “The authority to designate wilderness lies in the State Legislature.” PRC Section 5093.33 anticipates that the California wilderness preservation system is “composed of State-owned areas designated by the Legislature as “wilderness area” and units of the State Park System classified as “State Wilderness by the State Park and Recreation Commission...” [Emphasis added.] Thus, these areas may be approved by the Legislature, such as Mount San Jacinto State park, or by the State Park and Recreation Commission, as proposed here.

**#15-17** CSP stands behind the description listed in Section P.1.5. While user group discussions did occur subsequent to the preparation of the November 2003 ABDSP Preliminary GP/FEIR, management direction indicated that the recirculation occurred for the reasons listed in Section P.1.5.

**#15-18** Please see Responses # 6-2, 6-7, 15-10 and 15-12. At the time the General Plan was prepared, approximately 405,100 acres of State Wilderness existed in ABDSP. The use of the word “unimpaired” refers to lasting effects caused by manmade intrusions. CSP does not believe that approval of the General Plan will adversely effect safety or cause a loss of access for a disproportionate number of young, old or the physically impaired and/or challenged because the General Plan does not remove access. Approval of the General Plan will, in contrast, allow construction of accessible facilities in appropriate locations throughout the Park, making the resources of ABDSP more accessible.

**#15-19** The statement is unclear as to whether it is referring to the establishment of California State Parks in General or Anza-Borrego Desert State Parks in particular. The Save the Redwoods League and the Sierra Club were part of a broad coalition of interested groups that advocated the formation of the California State Parks Commission, which in turn was successful in convincing California voters to pass a park bond act in 1928, which in turn led to legislation resulting in the formation of the California State Department of Beaches and Parks.<sup>2</sup> Credit should be given to the leadership of the San Diego Museum of Natural History, Natural History Society, and Chamber of Commerce for proposing that the State Park Commission include Borrego Desert in their selection of proposed State Parks. Park consultant Frederick Law Olmsted also supported their petition. Neither the fore-mentioned Save the Redwoods League nor the Sierra Club had any direct involvement in the procuring or donating of privately and federally owned land that eventually became the Anza-Borrego Desert State Park. The scholarly resources used to compile the park’s historical background do not indicate that there was any prior discussion that the lands be set aside as a “natural preserve.”<sup>3</sup>

---

<sup>2</sup> California State Parks. *The Seventh Generation. The Strategic Vision of California State Parks*, 2001, 5. [Http://www.parks.ca.gov/pages/91/files/seven01.pdf](http://www.parks.ca.gov/pages/91/files/seven01.pdf).

<sup>3</sup> Diana Elaine Lindsay, *Our Historic Desert: The Story of the Anza-Borrego Desert*, Richard F. Pourade, ed. (San Diego: Copley Books, 1973, 86-90 and 93-97).

15-15  
(cont'd)

Since the General Plan document does not include the criteria established for these Focus Management Plans, this document is incomplete, lacking in detail and invalid. Asking the public to comment on or support Focused Management Plans that will seriously impact trails, roads, recreational facilities, development and maintenance on the basis of the current data available is both impossible and unacceptable. The goals and objectives as outlined in this document are too broad and all encompassing to merit support without a much more detailed analysis of their impacts to local economies, recreational use and facility development to meet the needs of an increasing population.

**Page 6**

15-16

The sentence that reads, “**The designation of the State Wilderness and Cultural Preserve may be made with no further environmental review than that provided by this General Plan/EIR**” is unacceptable. This General Plan/DEIR does not provide any review of economic impacts or loss of recreational opportunities that these designations will cause. This statement indicates that the authority to designate Wilderness lies with the Park Manager or the Director of State Parks. According to Public Resources Code 5093.33 this is incorrect. The authority to designate Wilderness lies in the State Legislature. Therefore, this statement is incorrect and must be deleted from the General Plan/DEIR.

**Page 7**

15-17

While this revision of the General Plan did occur subsequent to the acquisition of Vallecito Ranch and Mason Valley, it was prompted by user group discussions with Director Ruth Coleman and Chief Legal Counsel Tim La Franchi of the Department of Parks and Recreation rather than simply revising the document to comply with CEQA and incorporate substantive material from responses to the last public comment period. Please change the language of this document to reflect the facts.

**Introduction to Existing Conditions**

**Page 1-3**

15-18

The document states, "ABDSP also holds the distinction of containing the largest area of State Wilderness in California, with 404,000 acres set aside, unimpaired for all generations." This statement is incorrect. Designation of Wilderness directly equates to loss of access for a disproportionate number of young, old and the physically impaired and/or challenged who will be unable to enjoy or enrich their lives by visiting and enjoying desert wilderness areas. With over two thirds of the Park already designated as wilderness, no more wilderness areas are needed. The location, lack of water resources, and climate of the area are all self-limiting factors of visitor use. Restriction of use of mechanical means of transportation in the desert climate significantly limits the number of visitors while increasing the danger to those who do visit.

**Page 1-3**

15-19

"The early conservationists who sought to bring protected status to the natural and cultural treasures of the desert lands would be proud today to see their vision realized." A little history is in order here. California Parks and Beaches (State Parks) was established by Save the Redwoods League and the Sierra Club to set aside these lands as

**#15-20** Accurate maps of designated roadways and trails have been displayed at the public meetings during the General Plan process. Roads and trails are currently inventoried as layers on the Park's GIS database and have reproduced in large format at numerous public venues over the last several years. The data layers for primitive roads and trails were created from field GPS data, and layers for paved roads and highways were created from USGS topographic maps. Mileage can be calculated from the associated data table once the information is entered. No roads or trails are scheduled to be closed in the General Plan. The GP is general in nature, therefore, management plans for trails, roads, wilderness, and fire management will be put out for public review in the years following approval of the GP and will provide a more in-depth survey with regard to visitor uses and resource vitality.

**#15-21** Please refer to section 3.2.3.1. The park purpose statement was updated to reflect modern parks issues, public uses and perceptions, and a stronger philosophy of park stewardship. Additionally, the 1964 Park Purpose predated many of the environmental laws that were placed into effect in the late 1960s and early 1970s.

**#15-22** "Spirit of Place" is a park planning term associated with the character of a particular park. Webster's definition of spirit includes "the dominant tendency or character of anything." There is no intention by CSP of casting a religious connotation on the Park and violating the separation of church and state. The later sentences simply describe some of the experiences visitors may feel when they see the vistas of the ABDSP desert and how deserts have affected mankind over history.

15-19  
(cont'd)

a nature preserve. It only passed the legislature because they called it a "Park". There were other conservationists who would be equally appalled by the written agreements that resulted in their properties being deeded over during the Park acquisition process for future generations to use when historic Rights Of Way to access and enjoy the Park have been abrogated by Park Land managers. In 1943 the California State Horsemen's Association (CSHA) was formed because of diminishing access to old roads and trails. Through their efforts (CSHA) the public resource laws were legislated and the California Riding and Hiking Trail was established as a foundation circular trail around the state. Several other legislative acts were passed to connect communities to this trail and public lands to each other. (Dunlap and Collier Keene Bills) Those same Conservation Groups have systematically sabotaged these laws.

**Page 1-4**

15-20

The document refers to 500 miles of primitive roadways and miles of mountainous trails to hike or ride. How many of these miles will be closed under the zones and prescriptions that will be implemented if this Plan is adopted? How have these roadways and trails been documented? What Deed and Title searches have been conducted to thoroughly determine if these roadways are under the Department of Transportation and/or county roads? Is there a complete and comprehensive route designation map available? If so, does this map show all the trail alignments that have existed since the settling of this region? Please provide accurate mapping of all roads, primitive roads and trails within Park boundaries. Please provide accurate maps that show transportation linkages to existing trails, roads, and primitive roads along the Park boundaries.

15-21

The Park's purpose statement adopted by the State Park Director on March 20, 1964 is to.... ***"make available to the people forever, for their inspiration, enlightenment, and enjoyment, a spacious example of the plains, hills and mountains of the Western Colorado Desert..."*** The current proposals in the General Plan/DEIR do not support this statement in that it does not indicate that two thirds of the Park will be inaccessible to the majority of Park visitors.

Since the Plan acknowledges that "the unique recreational and inspirational qualities are increasingly popular and sought after." Why does this Plan seek to reduce the opportunities to enjoy these qualities?

**Page 1-5**

15-22

The discussion of the Spirit of Place casts a religious connotation on the act of visiting ABDSP. The way this document is worded compromises the established doctrine of "separation of church and state". References to "spirit, spiritual, and religion" reflect a state supported religious aspect, which is inappropriate with respect to the doctrine of "separation of church and state". This section is inappropriate and must be deleted.

The Plan asserts that, "Desert lands have long cast a spell on humanity. Many are the stories of people venturing far out into an uncharted desert for months or even years, only to return with wisdom and clarity." It is a major contradiction to reduce these opportunities by restricting the majority of visitors to Focused-Use Zones that are highly

**#15-23** Many park visitors desire escape from the trappings and noise of the city life, so seek out the solitude of California's largest State Park. The Wilderness designation proposed on the GP maps does not close any existing roadways, nor preclude use or construction of new trails for use by equestrians and hikers. Wilderness use will always be subject to variations in visitor use, especially in a park such as ABDSP where seasonal rainfall directly affects the number of visitors in a given year. Much of the value of the Wilderness lies in the unbroken vistas that are also enjoyed by those in vehicles along the existing roadways. Please also see Responses # 6-2, 6-7, 6-24, 15-10, 15-11, 15-12, and 15-18.

**#15-24** CSP respectfully disagrees. The Anza-Borrego Foundation partnership role with CSP is described in Section 2.1.5.1. CSP does not acquire land from an unwilling seller, nor does the Anza-Borrego Foundation.

**#15-25** CSP has many ongoing partnerships with jurisdictional agencies, the local community, interested organizations, the business community, and public volunteers. Additionally, State Parks will continue building constituency and relationships with the surrounding communities and park user groups. As a broad planning document, the General Plan does not attempt to make detailed management recommendations. Therefore, a "sustainable relationship between human culture and wild nature" must be defined by future, more detailed planning efforts that involve park staff, the park users, and the scientific community. These future plans will provide defined operating guidelines for future park management. However, both existing and future park management must act as stewards of resources, including recreational resources. Currently park operations actively encourage participation from those groups with proposals that are consistent with the Park needs and values. For example, Backcountry Horsemen has brought in volunteers from five different chapters to conduct trail work in the Lower Willows area. The Park also partnered with CORVA on a volunteer work project in May 2002 on the Rodriguez Canyon Road. The Park has up to seventy volunteers working through the visitor center and information stations, seventy volunteers on the bighorn sheep counts, over fifty paleontology volunteers and over twenty-five archaeology volunteers. Volunteers participate on resource management projects and the Borrego Rotary Club maintains several bighorn sheep water stations. Currently the Park staff is working with volunteers, including several representatives from equestrian groups, on the initial development of the Trail Management Plan. Additional advisory teams will be formed for the upcoming management plans that incorporate appropriate public interest groups.

15-22  
(cont'd)

regulated. This land use planning tactic removes most if not all opportunities for the unconstrained visits that are implied by the statement above.

**Page 1-6**

15-23

“This document...provides conceptual parameters for future management actions...It provides guidelines for future land use management within a park, including land acquisitions and the facilities required to accommodate an expected visitation increase.” The latest studies, such as, “Shifting Trends in Wilderness Recreational Use by Robert C. Lucas and George H. Stankey shows that while Wilderness recreational use has grown greatly over the last forty years, the rate of increase in Wilderness recreational use has been slowing for some time. Recently it has leveled off and even declined in many areas. Visitation trends shown in this plan support the hypothesis that day use is the most common use, accounting for the majority of visits. Concentrating day-use activities in Focused-Use Zones reduces the opportunity for the average Park visitor to enjoy the peace and solitude that the Plan suggests is the ultimate goal of most Park visitors.

The Plan goes on to state, “whether the Park is experienced during a quiet walk through a forest of ocotillos, meditation upon a weathered boulder, a drive along a lonely road or on a guided wildflower tour, each visitor takes in its essence in his or her own personal way, to carry forever...” This is a beautifully written sentiment that is not supported by the purpose and intent of this General Plan. The restrictions of additional Wilderness designations, establishment of Focused-Use Zones, restriction of mountain bikers and equestrians to designated roads and trails all combine to make this sense of place less achievable by more visitors.

**Page 1-7**

15-24

The Plan states, “...provides guidelines for future land use management within a Park, including acquisitions and the facilities required to accommodate an expected visitation increase.” The fact that land acquisitions have been and will be conducted through the Anza Borrego Foundation, a non-governmental organization, with no oversight by either elected officials or the public is unacceptable. This group has a very negative reputation with many property owners that have been approached during the acquisition process. We strongly encourage corrective action by the California Department of Parks and Recreation that includes strict oversight of the entire land acquisition process.

15-25

We take strong exception to the sentence “The General Plan process includes public participation with a goal of forging stronger more effective links with the local citizenry.” In actual practice, to date, the current management of the Park has only fostered links with selected individuals and groups that support their preferred activities, such as, bird watching, nature walks and counting bighorn sheep. More active forms of recreational interests, such as, four wheel drive clubs and equestrians have actively lobbied for agreements and Memorandums of Understanding that will benefit the Park by assisting with trail maintenance, clean-ups and volunteer patrols without success. At a minimum, Volunteer Patrols would be a tremendous asset in such a vast area with so few rangers to patrol it.

**#15-26** CSP respectfully disagrees. This statement has been taken out of context from Section 2.1.3.2 which also states that BLM protects land for conservation. Some of the allowable uses on the BLM land include hunting and green-sticker vehicle use which is in conflict with the existing management of ABDSP. Please also see Response # 6-11.

**#15-27** Please see Section 3.3.1.10 of the General Plan. Additionally, new acquisitions will be subject to all the Goals and Guidelines in the General Plan. An example of a new acquisition in the General Plan is the Vallecito Ranch in Section 3.3.2.8 which contains many new uses for the public. Also, trail corridors on the Lucky 5 were an important aspect of its acquisition.

**#15-28** CSP personnel did not take an adversarial position in fighting the Coyote Fire. Park Superintendent Mark Jorgensen and District Resource Ecologist Paul Jorgensen were both asked to make a determination on use of bulldozers to secure the fire line in Riverside County. By the time they arrived, the active fire was several miles from the northwest corner of the park, and from homes near the town of Anza. They were asked if they desired further bulldozer activity there, or whether the work should proceed with use of hand crews. They chose to remove dozers from further damage, and returned several days later to work with USFS crews and heavy equipment to groom the dozer scars, realign the Pacific Crest Trail, and complete the rehabilitation of the dozer line, saving the USFS thousands of dollars in further work. At no time were the lives of firefighters or the residents of Anza compromised. Park Staff works closely with Incident Command on all fires, and life and property always come before protection of chaparral and open lands.

**#15-29** Marijuana cultivation is widespread across not only California, but the entire U.S. and Mexico. To state that land managers are not doing their job because a single plantation was discovered from a helicopter during fire recon is not representative of the hard work that is being done to curtail illegal drug smuggling and cultivation on State Parks. Two fulltime rangers work on poaching, plant theft cases, drug smuggling, pot growing plots, illegal immigrant smuggling, and OHV violations in the Colorado Desert District of State Parks. This team has removed many marijuana plots from parklands in Anza-Borrego Desert, Cuyamaca Rancho, and Palomar Mountain. The subject marijuana farming was originally detected by BLM agents and destroyed with a joint operation of BLM, State Parks, San Diego County Sheriff, and DEA. The plants had already been cut down and flown out by the joint enforcement team. All that remained was irrigation hose and planter pots that were subsequently destroyed in the Coyote Fire.

**EXISTING CONDITIONS**

**Page 2-4,**

15-26 | References to Bureau of Land Management (BLM) allowed public uses and "the potential for adverse environmental effects"...is a very biased statement. Approximately 2/3 of the Park came from BLM patents. The transfer documents stated, "Please note that the patent from USA is conditional." Later patents such as acquisition 131 dated 8/4/1975 had a reversion clause that BLM land could revert back to BLM if the Department of Parks and Recreation (DPR) fails to comply with commitments A through D in the decision dated October 23, 1975, then it's possible that the land will revert to the U.S.A." This particular patent has sections within the 3.1 mile closure of Coyote Canyon Road. We feel that DPR has not, in fact, complied with the commitments as stated in the patent and is, therefore, subject to enforcement of the reversion clause.

15-27 | On the same page in paragraph 7 the Plan states, "...as privately held lands are added to ABDSP...land previously closed will be available to public access..." What criteria will be used to determine that land acquired in the future will, in fact, be opened to public access? Park management has a long history of seeking to acquire properties to increase preservation not for public access. For example, the Plan discusses acquisition of the Lucky 5 Ranch not to provide additional camping or equestrian access, but for its importance as a valuable biocorridor. It de-emphasizes additional recreational use while stressing preservation. This raises the question of the level of restrictions that will be placed on this parcel of land. It also casts extreme doubt on the intentions of Park Managers in any future land acquisitions.

**Page 2-5**

15-28 | The Plan reads, "...although California State Parks works cooperatively with the U.S. Forest Service during fire events the fire management policies of the agency may conflict with those of California State Parks." This was readily apparent in the October 2003 fire in the Riverside County portion of the ABDSP. California State Parks has not maintained access to the water storage tank at the northern end of Coyote Canyon that was put there for fire suppression. California State Park staff took very adversarial positions in fighting this fire. The lack of support for the use of heavy equipment during extreme fire conditions put both firefighters and citizens at great risk.

15-29 | The Forest Service found a Marijuana Plantation on ABDSP adjacent to Forest Service land while fighting this fire. This clearly indicates a failure of land managers to exercise best management practices and effective oversight of public lands in their charge. When legal concerned citizens are barred from public lands and the managing agency is, in their words, too understaffed to provide effective oversight of these lands it is inevitable that criminal activities will increase. Why is the issue of this level of criminal activity within Park boundaries not even addressed in the General Plan/DEIR? Not only is there obviously illegal motorized traffic to set up such a plantation, such activity disturbs the ecological conditions in this section of the Park. It introduces exotic species, uses a

**#15-30** Please see Response # 9-4. Such meetings could include cooperative agreements for the use of equipment.

**#15-31** The process of CEQA and NEPA dictates that before a government agency conducts such a project, that agency must prove that the release of exotic wildlife will not adversely impact the native environment. The release of turkeys occurred on private ranches; such actions on private land do not trigger CEQA compliance. Turkeys are common to many State Parks. Should the California Department of Fish and Game release non-native game species for hunting, that agency would bear the responsibility for addressing the potential effects, including the cumulative effects, of such actions on the Park.

The moment an exotic species is introduced to an area, it becomes part of the ecosystem. Stating that it is “part” of the ecosystem fails to qualify its “effect” on the ecosystem and also our value judgment of that effect. Tamarisk is part of the ecosystem. Turkeys are part of the ecosystem. A concern that exotic game bird releases and subsequent establishment may have a negative effect on native species in this region is based on fact. The extent to which they effect native species, and the ramification this effect may have on bird hunting traditions, on park management, and on Fish and Game Policy are just a few of the interesting and difficult issues that surround this situation.

**#15-32** Please see Response #12-7. All water users draw down the water table, particularly during a period of extended drought. Data supporting the effects of development and agriculture on groundwater is a known issue of concern in Borrego Springs. Specific hydrological data is available from the California Department of Water Resources and the CDWR sources are noted in the Bibliography in Section 8.3 as well as a study by D. K. Todd. This section of the document (2.1.3.5, Private Operations) addresses the effects that outside influences have on the Park as an existing condition. Hydrology within the Park is addressed in Section 2.2.1.5.

**#15-33** The earliest mining claims in the Julian/Banner/Cuyamaca mining districts date back to approximately 1870.<sup>4</sup> The Regional Water Quality Control Board (RWQCB) has data available regarding toxins commonly found near mining operations. Active mining operations are monitored by the RWQCB as well as water quality near inactive operations. Mining is under the jurisdiction of the BLM.

---

<sup>4</sup> Diana Lindsay, *Anza-Borrego A to Z: People, Places, and Things* (San Diego: Sunset Publications, 2001), 59, 134, 208.

15-29  
(cont'd) higher level of water than so called native vegetation and leads to littering. Additionally, the consequence of wildlife fire from untended campfires is an ever-present danger.

**Page 2-5 & 6**

15-30 There is a reference to Ocotillo Wells State Vehicle Recreation Area (OWSVRA). Park staff has expressed concern for seasonal flooding and washout of primitive roads. There have been multiple suggestions from the public that a cooperative agreement be worked out between OWSVRA & ABDSP. ABDSP would benefit from the heavy equipment that the SVRA has right next door to regrade and restore these roads. This would expedite repairs and save taxpayer dollars. Currently repairs are seriously delayed, which directly impacts the public's right to access those affected sections of the Park.

**Page 2-6**

15-31 The document refers to the California Department of Fish and Game's game bird stocking program that may release exotic birds such as Chuckar, Pheasant and Turkey. If this is an on-going program, how many years has it been in use? If these species have been released regularly over several years, they have become part of the ecosystem. What, if any, scientific data has been collected that demonstrates actual impacts on so-called native species and ecological processes? To date, no scientific study has been presented to support the arbitrary assumption of this "concern" although Park Land Managers have had ample time over the years to conduct such a study.

**Page 2-7**

15-32 What hydrological research has been conducted to establish that agricultural use and development does draw down the Borrego Valley aquifer? We don't agree that these are the only reasons for draw down of the aquifer. Climate change, seismic activity and changes in rainfall patterns are also responsible for decreased recharge of the aquifer. Other Park documentation acknowledges that the region has been subjected to a prolonged period of below average rainfall. Park Managers recently entered into an agreement with the Bureau of Land Management and Imperial County for tamarisk removal citing adverse impacts on the surface and ground water of the region. What research is currently being conducted to support the hypothesis that large agricultural operations in the desert are a major concern for natural resources of ABDSP? What data is available for review by licensed hydrologists that supports this hypothesis?

**Page 2-7**

15-33 The document refers to many small gold mining operations that are still active southeast of Julian and implies that they have a negative impact on water quality, slope stability and sensitive habitats. How long have these operations been in existence? What data has been collected to determine what negative impacts **might have** occurred? What comparison plots have been established and monitored both during active mining operations and when mining operations have ceased? What changes have been documented to exist both during active mining operations and since operations have ceased?

Additionally, according to the Acts of June 29, 1936, the federal government retained mineral rights in the land transfer. Any mining done in the Park would remain under the

## California State Parks Response

**#15-34** As stated in Section 2.1.3.6, negative effects are an existing condition and range from vehicles driving off designated road to litter and fatalities. Most of these impacts are caused by illegal immigrants and their smugglers. The Border Patrol coordinates with CSP but will drive off designated roads in pursuit of illegal immigrants. This statement does not place wildlife corridors above the security of our country and its residents, but simply states the existing condition. Certainly, the visitors' experience is compromised by the possibility of encountering a campsite full of litter or desperate people evading the law. A man-made structure would interfere with the experience that people came to the Park to enjoy.

**#15-35** The aesthetic value of undisturbed vistas is paramount to the importance of the ABDSP experience.. Please note your comment 15-1 and the CSP Response #15-1. Please also refer to Responses #6-2, 6-7, 6-11, 6-24, 15-10, 15-12, 15-18, 15-23 and the comment letter # 9.

**#15-36** Impacts of renewed activity of the Carrizo Railroad could include direct take of the Federally Endangered Peninsular bighorn sheep, impacts to their activity during lambing, alteration of their movement within their home range, and other impacts to the population in general. Several bighorn have been known to be killed by the train in the 1970s. Little to no consideration has been given to the re-opening of the line with regards to its impacts on the endangered bighorn. No provision has been made for hazardous material accidents on the rail line; fire control on the line, or within the old wooden tunnels, or on wooden trestles; and no provisions for the expected hauling of massive quantities of propane gas through the gorge. CSP does not oppose the reopening of the rail line, since the railroad predates the Park, but is concerned that the reopening is being conducted without proper preparations to safeguard the public or the public resources.

**#15-37** CSP is accountable to the local and state populace. Land purchase is made with willing sellers only, and often with State Bond funds. Most purchases are "inholdings" within the bounds of the state park. Other opportunity purchases from willing sellers are in the public forum and then management of such lands is under constant public input and participation. Please also see Response # 15-24.

**#15-38** Off-road groups have been instrumental in assisting the park with crucial road work to maintain public access on washed out routes of travel. Examples are Coyote Canyon, Rodriguez Canyon, and Oriflamme Canyon. Equestrians gather together every November to assist in the reopening and restoration of the Lower Willows and Middle Willows Trail in Coyote Canyon. Horse groups built the Whitaker Horse Camp and donated all the pipe corral there, as well as the group picnic shade ramada used every November for a joint BBQ between the BackCountry Horsemen of California chapters and the CSP employees. Approximately 50 equestrian volunteers attend this annual effort. Please also see Response # 15-25.

**#15-39** CSP respectfully disagrees. CSP agrees that nature does not exist in stasis, and the statement that the badlands are fragile should not be taken as a claim to the contrary; however, CSP still believes that, in aspects specifically related to the value of this region as a State Park, the badlands are fragile. For example, the aesthetic appeal is specifically related to this fragility. Many people come to this park specifically because they are drawn by an appreciation for

15-33  
(cont'd) jurisdiction of the federal government, not the State Park Commission. According to information recorded in Diana Lindsay's Master Thesis in the late 1960's, this makes ABDSP the only state park in California open to prospecting. If this status has been changed what is the legislation and authority that changed it?

**Page 2-8**

15-34 How can the issue of Border security even be debated as "a negative impact on the areas aesthetic values? In this era of worldwide terrorism, why should we place the value of wildlife corridors higher than the security of our country and its residents?

15-35 The discussion of motor vehicle routes through the Park is moot. The RS2477 rule of law affects the status of many of the Park routes. Loss of opportunities to see the Park and to travel across the desert by the most efficient route far outweighs the negative impacts stated in this document. The mere fact that a road that crosses straight through the desert appears to be an artificial intrusion is a perception. It attempts to enforce one set of values over another. Discussion and decisions on routes should address the issue of public safety.

15-36 There are proposals to restore the San Diego and Arizona Eastern Railroad. Not only would this restoration allow many people an opportunity to view incredible vistas of ABDSP with little physical effort, it would provide a much needed linkage for the movement of goods between San Diego County and Mexico. Additionally, this restoration would enable Park patrons to see vast expanses of the Park while subtly controlling the impacts of such visitors. What impacts are anticipated to occur when this rail corridor is re-activated? What criteria will be used to determine the significance of these impacts?

**Page 2-9**

15-37 The discussion of land acquisitions goes far beyond the scope of Park management planning. Anza-Borrego Foundation operating as an independent 501(c) 3 to carry out Park management strategies removes accountability to the local and state populace. The fact that a small group of Park Managers can establish land acquisition priorities and circumvent public oversight of the process by working through a non-governmental organization is unacceptable.

**Page 2-10**

15-38 The statement that California State Parks actively encourages participation from volunteer groups with *that are consistent with the Park values and needs* completely ignores some volunteer groups while encouraging other groups that conform to Park employee value systems. Other organizations such as off-road groups, Four-Wheel Drive Clubs, equestrian groups and other special interest groups are restricted by Park staff to much more limited volunteer opportunities.

**Page 2-18**

15-39 The statement that the badlands are fragile because they are subject to rapid changes whether natural or anthropogenic is unfairly biased. These badlands have existed for

**#15-39 (cont'd)** the unique badland features. What CSP believes they are appreciating is the result of the dynamic interaction of nature's forces- the colors, the shapes, the textures. Although these values can be largely attributed to the erosive nature of the constituent sediments, it is also that erosive nature that may detract from the aesthetic appeal in respect to its response to impacts from human uses. It is CSP's belief that people do not come to the park to see these hillsides scarred by evidence of tire tracks or multitudinous trails, but rather the work of wind, water, sun, and earth movement. In addition, presence of highly significant and irreplaceable paleontological resources must be noted. This belief was substantiated during the public meetings for the General Plan and the many letters of support (Please see the Comment Letter Matrix as well as the individual letters). The exposure rate of these resources is an additional important variable that is closely tied to the fragile nature of this environment.

**#15-40** Surface disturbance for mineral extraction within ABDSP is certainly not in the public's interest or in the interest of preservation CSP values. The General Plan approval does not adversely affect existing local economics (not subject to CEQA). The main important mineral of economical import in the region is gypsum which is currently being extracted in one of the largest gypsum deposits in the world, on the adjacent to ABDSP in Imperial County. Much of the gypsum mine is on land leased or converted from the BLM. Hobby mineral explorations for gems and trace gold is not of "serious economic" consequence.

**#15-41** Please see Response # 15-32.

**#15-42** The studies cited in the Bibliography, Section 8.3, provide a good overview of desert soil dynamics and ample evidence to support the resource concerns noted. The commenter has not presented any evidence that conflicts with the information utilized by CSP.

**#15-43** As stated, the brief discussion of severe storms is primarily intended to note that "the resultant floods can endanger lives and cause extreme damage." This is important to note for facility development and park management with regard to recreation. CSP seems to have similar ideas regarding the dynamic potential for natural systems, however, flash floods routinely take lives and personal property in the southwest, and in this regard, a healthy respect for the power of natural forces is appropriate.

15-39  
(cont'd)

hundreds if not thousands of years although both natural and anthropogenic activities have taken place. This statement supports the false concept that nature exists in stasis. There are a multitude of natural activities, such as, earthquakes and severe storms that keep the landscape alive, dynamic and ever changing.

**Page 2-20**

15-40

This document states, "...the mineral resources of the ABDSP region are significant". Loss of opportunities to explore for these resources does not support the higher public good. Mineral withdrawal in an area known for mineral resources has serious economic impacts on area residents. It impacts the cost of goods and services across many forms of industry and manufacturing. Denial of pre-existing mining claims is a major concern. What important resources are being secluded by the Park designations? Even lands that have been mined as open pits can be restored to scenic, natural appearing landscapes, as is demonstrated by the Cuyuna State Recreational Area in central Minnesota.

**Page 2-21**

15-41

The statement in the document reads, "Subsidence caused by groundwater over draft for agricultural and recreational use **may be** a problem along the borders of the Park and for the town of Borrego Springs." What is the scientific basis for this statement? What licensed hydrologist has been consulted on this matter? Why are there no scientific studies referenced with regard to this claim? What other contributing factors are involved, such as, climate change and variations in rainfall patterns that are known to occur in associations with drought conditions?

**Page 2-22**

15-42

The discussion of the composition of the cryptogamic crust includes a very biased statement that "open camping and off-trail hiking **may** have subtle yet significant negative effects on the desert ecosystem." This statement is stated as fact, but is founded upon very limited scientific study. Desert soils are highly erosive and subject to both movement and change through a variety of natural events that include, but are not limited to, flooding, wind action and disturbance by burrowing animals. What baseline was used to determine that these soils are so sensitive and slow to recover from human disturbance as opposed to desert weather patterns and animal use? Photographic evidence collected by Park Rangers does not support the suggested negative impacts.

**Page 2-23**

15-43

The severe storms referred to in the Plan as "hundred year storms, can deliver enough precipitation in a single 24 hour period to more than double the deserts average rainfall... and cause extensive damage." This comment indicates a perception by land managers that the natural condition of the desert ecosystem is stasis, this, is simply not true. The fact that these so-called "hundred year storms" occur much more frequently supports the hypothesis that the desert ecosystems are dynamic, ever changing and vital. When these so-called "hundred year storms" occur, areas impacted often experience new growth and dynamic changes in vegetation and wildlife activity. For example, after the severe storms of 1993 habitat specific species such as the Least Bell's Vireo simply

**#15-44** Please note that the California Air Resources Board identifies vehicular, mining and agricultural activities as causes of wind-borne particulate matter. As discussed in Section 2.2.1.4, the Salton Sea Air Basin is in a non-attainment area for particulate matter. Although, a volcanic eruption would affect particulate matter, the General Plan document discusses the most common causes within the Park.

**#15-45** Although CSP does “borrow” heavy equipment from OWSVRA on occasion; the Park does not have more than one piece of heavy equipment and has no dedicated position of Heavy Equipment Operator. Roads are being addressed by management on a contract basis with most of the District road budget being dedicated to road maintenance within Anza-Borrego, including the Turkey Track Grade, Oriflamme Canyon, Mason Valley Truck Trail, Rodriguez Canyon, and the Bypass Road. Please also see Response # 15-30.

**#15-46** CSP agrees with your statement, “Although increased development on the desert does impact water table levels, the long period of drought and climate changes...also has a significant impact on the desert ecosystem”. Please note that this realization is directly related to the need for protective measures at the Park’s wetland habitats. Please also see Response # 6-15 related to cumulative effects and interaction of disturbances. Please also see Response # 15-32. The General Plan describes the environment at a level appropriate to the first step of planning and environmental review.

**#15-47** As stated in the General Plan, Section 2.2.2.2 at the top of page 2-37,, “the long-term negative effect of this recreation on soil stability, vegetation, and wildlife communities is largely unknown.” Quantifying these relationships will be a focus of future management plans.

15-43  
(cont'd)

relocated to sections of the riparian corridors where their habitat needs were met.  
Landscape and vegetation changes are a fact of life and are to be expected not feared.

**Page 2-25, 26**

15-44

There is a lengthy discussion on Air Quality and Pollutants. We agree that the major portion of the air pollution is wind-borne, however the comments attributing the major sources to vehicular and mining activities within and adjacent to the Park are disingenuous at best. The issue of wind-borne particulate matter extends far beyond the causes stated in this document. Wind-borne particulate matter has been tracked around the world in catastrophic events, such as, when Mt. St. Helens in Washington State erupted in 1980.

**Page 2-27**

15-45

The discussion refers to the impact of alluvial flows on the Park's primitive road system, Park signage and visitor safety can and should be addressed through effective budget and maintenance allocations. Recognition of the need for adaptive management of primitive roads whose alignment may change seasonally, while more difficult than simply closing the roads, does not allow for monitoring and studies that will extend our knowledge of desert ecosystems. As mentioned earlier a cooperative agreement with OWSRA would alleviate the expressed concerns and reduce the budget costs at the same time.

**Page 2-27-28**

15-46

The discussion of hydrology and water rights is of great concern. Why are there no licensed hydrologists reports referenced in this discussion? The claim that excessive water consumption is depleting the Colorado Desert water table is biased. Although increased development on the desert does impact water table levels, the long period of drought and climate changes that deposit less rain to recharge the aquifer also has a significant impact on the desert ecosystem. The language in this document that indicates that water flows and groundwater recharge within Park **may be** impacted by upstream diversions of water on private properties outside the Park boundaries has little merit. The reality is that this region is in a moderate to severe drought cycle. Since groundwater recharge occurs mainly by percolation from mountain streams as they enter and flow across the valleys, the average rainfall and the spacing of winter storms is a major factor in how much groundwater recharge will occur. The oldest rule in the west regarding water rights is that the upstream water user has the right to use it. Many of these diversions have been in place for many years. What empirical data has been collected by hydrologists to support direct linkages between existing upstream diversions and groundwater recharge?

**Page 2-37**

15-47

The fact that a significant number of perennial plants are found in washes, arroyos and adjacent terraces even though these areas are commonly used by highway-legal vehicles, equestrians, mountain bikes, hikers and campers indicates that the long term effect of recreational activities is minimal. What research studies have been conducted to measure vegetation growth patterns in washes and arroyos that are commonly used by recreationalists? What studies have been conducted to establish vegetation growth

**#15-48** You bring up many good questions that CSP desires to address through future studies. Please see the brief discussion of disturbance in Response #6-15.

**#15-49** The General Plan, as a program level EIR, includes a brief discussion of amphibian existence and significance in ABDSP. A discussion of “extraordinary efforts to protect and preserve” are not included because this level of detail would be more appropriate for the Natural Resource Management Plan. However, in an evolutionary framework, species “living on the edge” are arguably among the most significant contributors to biodiversity. In this respect, it would seem that CSP’s Mission statement charges CSP to, at the very least, consider “extraordinary efforts to protect and preserve” these important components of life.

**#15-50** CSP respectfully disagrees. It is CSP’s belief that protecting “...ample and undisturbed sources of surface water and wetland and riparian” is a necessary management action to meet the habitat needs of the region’s avian fauna. The commenter “takes strong exception” but provides no substantive evidence to support that exception.

**#15-51** The California Director of BLM concluded in a letter in Sept. 2004 that the feral horses of Coyote Canyon were treated within the confines of the law. The BLM had on several occasions determined the Coyote Canyon herd of feral horses was not a viable wild horse herd with proper genetic diversity to maintain a healthy population. BLM has legally transferred adoption rights to the Black Hills Wild Horse Sanctuary for the nineteen mares and foals transported there in April 2003. The horses were not transferred “during a blizzard” as stated, but were in fact held on a ranch in Utah until the weather permitted safe transfer to the Black Hills. Horses, once secure on the wild horse sanctuary, gained an average of two hundred pounds each, and thrived thru the winter and spring months. The drought of Anza-Borrego, on the other hand has extended and worsened, and the expected arrival of West Nile Virus hit California hard, as anticipated. As of late September, 2004, well over 300 horses statewide had contracted the disease, and over 160 had died.

15-47  
(cont'd)

changes if recreational activities are absent? Many of the perennial plants described respond well to disturbed soils regardless of what caused the disturbance.

**Page 2-39**

15-48

Mycrophyll woodlands that are typically found in sandy or gravelly arroyos are subject to flash flooding and drought. Some primitive roads lie within these woodlands. What empirical studies have been done to measure vegetation changes in areas that have primitive roads? What studies have been done in similar areas without roads? What hard data has been recorded to establish that vegetation changes occur and that human recreational activities are directly responsible for them? Why are no studies referenced to support the need for change in current conditions? Since the arroyos where this vegetation complex occurs are subject to regular flash flooding, why are primitive roads that are subject to complete erasure by flooding being considered a negative impact? How much of this vegetation withstands a flood event?

**Page 2-40**

15-49

The discussion of amphibian species that have the potential to exist in ABDSP points out the frailty of these species in a xeric landscape. These species are living on the edge. Extraordinary efforts to protect and preserve such sensitive moisture dependent species are very expensive and subject to failure due to climate conditions and other cyclical changes over which Land Managers have no control. Attempts to restore such species to their so-called historic ranges must consider a wide range of factors including changes in the topography of the landscape, changes in precipitation amounts and distribution among many others.

**Page 2-41**

15-50

We take strong exception to the statement that "...ample and undisturbed sources of surface water and wetland and riparian are critical elements for avian survival and diversity within the Park." The vast majority of the bird species cited are very adaptable to human activities provided their habitat needs are met. This can be done without eliminating human activities that are also dependent upon water resources in a desert setting.

**Page 2-12/Page 2-60**

15-51

The Plan refers to large mammals such as bighorn sheep, mountain lion and feral horses as unique in character and stimulating to public interest. Further along in the Plan it states, "In 2003, 29 horses were removed from Coyote Canyon and relocated to wild horse sanctuaries due to the health stresses from prolonged drought. The small band inhabited the Canyon since **at least** the 1930's when they escaped or were released from local ranches. Feral horses have the potential to cause damage to cultural and natural resources at adjacent alluvial fans and desert scrub." The removal of this band of wild horses clearly violated the Federal Wild Horse and Burro Act. See page 3, paragraph 5 of the 1995 Coyote Canyon Public Use Plan.

These Wild Horses were not suffering health or stress related problems from drought conditions any more or less than other species of large mammals in the Park, such as,

**# 15-52** Information is readily available to support this opinion (Trombulak and Frissell 2000). In addition, CSP resource ecologists have personally witnessed many adverse effects associated with the filling in of a desert creek with a highway and its negative effects on the riparian habitat and associated plants and wildlife as listed in Section 2.2.2.3 in the grey type.

bighorn sheep. They are accustomed and have acclimated to surviving episodic drought cycles just as any other species in ABDSP. This herd had remained stable at plus or minus thirty head for many years. Most of the horses removed were 20 years old or older. Their family bands were disrupted and pregnant mares and foals were loaded and transported to a sanctuary in South Dakota during a blizzard. Capturing and moving these animals under such stressful conditions clearly violates the public trust. The choice to remove animals that clearly had a unique niche in the Coyote Canyon ecosystem was ill considered. It clearly demonstrates support for a biased agenda rather than best management practices. At a bare minimum, there should have been a biological opinion completed and possibly a complete Environmental Impact Report.

15-51  
(cont'd)

The actions of Park Managers in removing these animals are a clear violation of their fiduciary duty to the citizens of California. Several units of the Backcountry Horsemen of California expressed a strong desire to partner with ABDSP and BLM to establish a home range for these historic resources, but Park management has been totally uncooperative in any efforts to spare these animals the stress of disruption of the herd structure and, for the mares and foals, extreme climatic changes at the worst time of year. Furthermore, Park Management authorized a study of the impacts the herd might be causing on the bighorn sheep and the habitat in Coyote Canyon and, then, pulled the herd out of the Park without allowing the study to be completed. This action cost the taxpayers for a study that was not completed, in addition, to the costs of rounding up and removing the wild horses. Further it has been reported by reliable sources that domestic horses have been placed in the Canyon in an attempt to replicate the activities of the herd that was removed. This activity is expensive and an exercise in futility as it does not and cannot replicate the activities of the wild herd that was removed. It certainly is not an example of the use of best management practices.

One has to ask why the Park Management would further burden the taxpayers with the extreme measures Park Managers took in shipping the horses out of state and arranging to have them sterilized. Both measures were unnecessary. The potential of causing resource damage and competing with the Bighorn Sheep for water and forage, as stated in earlier releases, were unsubstantiated. We believe that the real reason for removal is that this herd is the only Wild Horse herd in Southern California, which would bring unwanted visitors who would want increased access to the Coyote Canyon area and thereby bringing added pressure to reopen Coyote Canyon Road. Both issues are linked. Park Management could assure that the herd would never be returned by destroying their gene pool.

**Page 2-43**

15-52

The General Plan/DEIR states; “State Route 78 and County Highway S2 provide a major source of negative impact to San Felipe Creek and associated wildlife and habitat.” Please provide the research and statistics to support this conclusion. Both of these roads are a result of engineering and planning prior to construction. They are historic and perhaps pre-historic routes that have provided significant transportation routes throughout the recorded history of the area.

**#15-53** Please see Response #6-16. Extrapolation of findings from related studies is a common scientific practice and a necessary management technique. It is a logical step that is a necessity due to the fact that it would be extremely inefficient to subject every management decision to a site-specific rigorous evaluation. Studies have shown that soil disturbance promotes the invasion of exotic plants (Mooney and Drake 1986, Hobbs and Huenneke 1992, Pickett and White 1985). Horses disturb soil (Cole 1983, McQuaid-Cook 1978, Weaver and Dale 1978, Whittaker 1978, Widner and Marion 1994). Desert soils are relatively fragile and slow to recover (Bainbridge and Virginia 1995, Web and Wilshire 1983). Therefore, unrestricted equestrian activity has the potential to contribute to the invasion of exotic plants and in general, to a disruption of the system of life that depends upon the integrity of desert soils. CSP resource ecologists have reviewed the Environhorse website (referenced later in this comment letter) but were not able to identify the UC Davis studies referenced in the commenter's letter.

**#15-54** The information you have requested is available through the U.S. Fish and Wildlife Service. CSP has enabled you to research this type of information through the references provided in this Section 8.3, examples include the U.S. Fish & Wildlife Service, 2000a, Draft Recovery Plan for the Quino Checkerspot Butterfly.

**#15-55** Issues concerning the legitimacy of this species status as State Threatened should be directed toward the California Department of Fish and Game.

**# 15-56** This area is monitored through State Park Ranger patrol. CSP's concern is focused mainly at organized and intentional poaching.

**#15-57** CSP Resource ecologists disagree with the statement that the Argentine Ant has totally displaced the native harvester ant species. Habitat destruction remains the number one cause of Flat-tailed horned lizard decline. Please see Section 8.3, including Desert Reptiles, *The California Desert: An Introduction to Natural Resources and Man's Impact*. Stebbins, R. C. 1995.

**Page 2-43**

15-53 The General Plan/DEIR discusses the impacts of roads, equestrian, bike trails and foot traffic MAY erode montane riparian areas assisting in the establishment of invasive exotics...it goes on to discuss “the equestrian-associated spread of exotic vegetation”, this assertion has never been substantiated by hard scientific data. In fact, studies conducted by the University of California, Davis do not support this claim. The document asserts a positive correlation between the establishment of invasive exotic plants and human-induced disturbance of soils and vegetative cover. Is this research repeatable? If so, where has it been replicated? Please give complete reference information to support this comment.

**Page 2-52**

15-54 The General Plan/DEIR discusses the “probable” sighting of the Quino Checkerspot Butterfly. We strongly encourage that all planning and land designations regarding the potential occurrence of this species in the Park be based of hard scientific data. The species, first, must be documented to actually occur in ABDSP. We strongly oppose any potential habitat designations. The species either occurs in the Park or it doesn't. Please document the entire range of this species with readily identifiable maps that indicate cities, towns, roads, routes and trails, and significant geographical landmarks.

**Page 25-53**

15-55 The document states that the Barefoot Gecko is a State Threatened Species. The question is what the full range of this species is and what are the population counts in Mexico? If the species has been known to exist since the 1970's, why has there been no research done on its habitat and behaviors? If there is, in fact, no research data available on this species, how can it be considered a State Threatened Species? Please document the entire range of this species with readily identifiable maps that indicate cities, towns, roads, routes and trails, and significant geographical landmarks.

15-56 Discussion of the Sandstone Night Lizard, stresses poaching as the major concern for this species. How is this area monitored? How many visitors are counted in this area per month? Although we are unsure of this species habits, the fact that it is referred to as a “night lizard” would seem to indicate that it is more active during periods of time when Park visitors are less apt to be in the area.

15-57 The document refers to “agriculture, development and intensive off-road vehicle use as known threats to the Flat-tailed Horn Toad Lizard. It does not mention the fact that the Argentine Ant has displaced the species of ant that is the horn toad lizard's primary food source. The Argentine Ant is noxious to the horn toad lizard, which has been the primary cause of population decline. This omission makes this section of the document incomplete and invalid.

**#15-58** Although petrol is approved for use with the herbicide CSP uses to kill tamarisk trees, it is not used in areas with surface water. Most herbicide is mixed with clean water. Many tamarisk trees are removed manually without the use of herbicide. Every effort is made to reduce the use of herbicides, but all those which are used are approved for the locations used by a certified pesticide applicator.

**#15-59** The status of least Bell's vireo population trends and Critical Habitat designation are more appropriately addressed to the U.S. Fish and Wildlife Service and California Department of Fish and Game.

**#15-60** Primary research by U.C Davis wildlife biologists, the California Department of Fish & Game, and CSP resource ecologists has indicated that ewe groups remained stable or decreased from 1986 through the 90's, hitting an all time low during 1994-1996 leading to the listing of the species as endangered by wildlife regulatory agencies. Since 1999-2000 ewe groups have increased in size to varying degrees. The ewe group that inhabits Coyote Canyon has not yet increased as much as some other groups. The relative impact of each form of threat to the sheep can vary from year to year and ewe group to ewe group. Please see the Rubin et al. study (1998) and the USFWS Recovery Plan (2000), both cited in this document. Since the road closure and the return of native vegetation the sheep's drinking habits are as would be expected for a naturally functioning creek, with drinking concentrated where vegetation is more open and water is at the surface.

**#15-61** A species on the verge of extinction is a management concern per the CSP Mission. Although the future of this captive population is uncertain, we do not agree that maintaining management ponds and providing for the continued existence of this endangered species should be regarded in any way as a small accomplishment or a neglected responsibility. Please also refer to Guideline Biota 1h, which addresses extirpated species and the potential reintroduction of such species. Currently, there is no more perennial surface water in Fish Creek, which complicates the reintroduction of this species to that location.

**#15-62** CSP is aware of the contribution of ravens in the decline of this species but did fail to include it. **CSP will include mention of raven predation in the Final General Plan.**

**#15-63** The extirpation of a native species (including the Condor) from a region, arguably due to human activity and occurring in the timescale of written history, deserves at the very least a consideration of re-introduction. Such an action would not be implemented without full environmental review and evaluation for the future success of both the condor and other species that may be affected by its reintroduction.

15-58 We have a great deal of concern of regarding the tamarisk removal projects. We have evidence that a principal ingredient in the herbicide is a petroleum-based product that has not been demonstrated to be safe for the environment or for the species found there. If some of the reasoning for removing OHV traffic from the riparian areas is concern for contamination of water and ground surfaces by petroleum products, how can Park Managers justify the use of a petroleum-based herbicide on tamarisk? What research has been done to monitor the potential impacts of this herbicide on other vegetation in riparian corridors? What are the potential long-term effects of the use of this product?

15-59 With regard to the concern expressed that the majority of Least Bell's Vireo are found outside existing areas of designated critical habitat, it is not an indication that more critical habitat needs to be designated. It is an indication that the species is well on the way to recovery. Least Bell's Vireo populations are increasing throughout San Diego County.

**Page 2-54**

15-60 Discussion on the Peninsular Bighorn Sheep indicates that the sheep prefer open areas of low growing vegetation. How have the closure of the primitive road through Coyote Canyon and the increased density of vegetation in the creek bed impacted sheep drinking habits? In listing the major threats to the Bighorn Sheep, please quantify the impacts of each form of threat. What are the current mortality percentages of each of these threats on the Bighorn populations by ewe group? Current research does not support the rate of decline of ewe groups indicated in this document. Our research has shown that populations have been on the increase since 1986.

**Page 2-56**

15-61 The General Plan/DEIR discusses a number of species that are threatened or endangered that are found in the Park, but are not considered native. This seems to be a very subjective determination on the part of Park Managers. Why are threatened and endangered species that are not considered native to the Park, presented as management concerns of the Park? What is the point of maintaining Desert Pupfish in artificial conservation ponds if there is no intention to re-introduce them into the Park ecosystem? This document appears to indicate that although this species has been held in conservation ponds since as early as 1978, there has been little research done to indicate that they could, in fact, be restored to Fish Creek. Why has so little been done?

15-62 We find the whole discussion of the Desert Tortoise invalid and incomplete. Desert Tortoise is notoriously slow moving and they are not native to ABDSP, although they are naturally occurring within 50 miles of the Park. Why has the biggest threat to Desert Tortoise populations not been mentioned in this document? There is no discussion of Raven predation on Desert Tortoise; therefore, this document is incomplete and invalid.

**Page 2-57**

15-63 We find the discussion of release of California Condors into ABDSP extremely disturbing. Removal of the Wild Horses from the Park on the basis of their impacts to native species while picking another species to release into the Park is at best

**#15-64** Park Managers place priorities on species management based on available staff and funding resources and in coordination with regulatory agencies and leading scientists. The Endangered Species Act and all species-specific policies, designations, and rulings made by the State and Federal regulatory agencies guide these actions. CSP management actions regarding livestock and feral animals in ABDSP are consistent with the well-established framework of contemporary ecology and the fossil record. Cattle (*Bos taurus*) are not native to this continent. There is no modern horse (*Equus caballus*) in the North American fossil record (Downs and Miller 1994). Related taxa for *E. caballus* went extinct some 11,000 years ago; the current environment in the Anza-Borrego region is now drastically different. Again, the commenter disagrees with the statements and conclusions in the document but does not provide any substantive evidence to counter the information in the GP/EIR.

**#15-65** While California State Parks does not refute the existence or significance of prehistoric and historic-era trails within the park, the issue of public access will be discussed in a trails management plan. Historic trail accessibility issues need to be discussed on a case-by-case basis. For example, park managers must address potential impacts caused by increased public use on a trail's historic character-defining-features. Other issues include the appropriate means of travel on such trails as not to cause irreparable harm to these features. Options park managers must evaluate include offering alternatives on non-historic routes while still offering the visitor the same experience.

**#15-66** These issues are not within the purview of CEQA nor do they address the potential significance of such issues. Road right of way issues as such these would need to be addressed as a legal issue under roadway easement and right of way. CSP does not have a record that the Fages/Anza Trail was ever a designated Riverside or San Diego county road; therefore, the Treaty of Guadalupe Hidalgo of 1849 and the subsequent Surface Mining Act of 1866 would not apply.

On testimony made to the house Subcommittee on National Parks, Recreation and Public land on June 28, 2004, Senator Bill Morrow testified that "The legislative Counsel has no enforcement powers ...", and that "The opinion of the California Legislative Counsel does not carry the weight of Statutory law or legal precedent." An opinion from the Legislative Counsel does not invalidate a legal opinion from the CSP Legal Office.

15-63  
(cont'd)

hypocritical. There is no way to measure the unintended consequences of this proposal. Again, the question is raised as to why discussion of a non-native species with the intent to introduce (or re-introduce) them is being given consideration in Park management. The introduction (or re-introduction) of a species into a non-native ecosystem calls for extensive study and documentation of the impacts. This General Plan/DEIR is not the place to introduce the concept of introduction of non-native species.

**Page 2-61**

15-64

We find the statement, “Domestic livestock and feral animals may also reduce the availability of water and forage.” very offensive and biased. The perception of Park Managers that they can pick and choose which species to protect and which to discard based their perception of what is native is arbitrary and capricious. There is no logical reasoning for determinations. This further indicates that the conclusions found in this document are flawed and invalid. Therefore, this document must be changed to include objective, measurable and repeatable scientific data.

**Page 2-63**

15-65

Many of the trails throughout the Park were first developed by the Kumeyaay. This means some trails have been in existence for thousands of years. The trail and road alignment through Coyote Canyon has literally existed for thousands of years. This document must recognize the historic significance of trails through the Park and ensure that the public has adequate access to these trails. It is important for Park visitors to experience and understand the incredible history of all the people who trekked along these trails as they explored and settled this region.

**Page 2-72**

15-66

We challenge the statement, “The extent of conveyance and any reservation of rights for access from land swaps and exchanges of the 1940s and 1950s (which are now referred to as deeds) have been reviewed by the California State Park’s legal office.” We believe that the Legislative Opinion issued on April 20, 2004 completely invalidates any findings by CSP’s legal department. Originally this road was established under the Treaty of Guadalupe Hidalgo in 1848. This was further established by language in the Surface Mining Act of 1866. All lawfully established county roads are carried forward in perpetuity, as is stated, in the Title Insurance in all properties the United States Government deeded to the railroads, which in many cases were sold to the public. Private property transfers to the Parks Department contained stipulations, such as, these stipulations contained in the acquisition of the AA Burnard III parcel on January 12, 1976: “A Right of Way in favor of the Public over any portion of said land included in lawfully established roads.” An additional stipulation reads; “Right of the public to use that portion of said land lying within the De Anza & Santa Catarina Trail.” The May 7, 1934 acquisition of the Marston property contains stipulations that read as follows; “A right of way of lawful width for any and all existing and lawfully established county roads, as reserved in the deed from the Southern Pacific Land Company.” On the Department of Parks and Recreation acquisition map #21, there is a footnote that reads; “the public has the right to use the De Anza Trail, see policy for 138. There is a similar footnote on DPR acquisition map #19 that states...see policy TI for 138.”

**#15-67** The statement regarding Mr. Winkler's traversing the canyon in 1925 is interesting; yet it may not be the first car to traverse Coyote Canyon. The April 11, 1924 *Hemet News* reported that Ben Janson and Dewey Brannan drove their Hupmobile through the canyon.<sup>5</sup> Both instances only prove that the Canyon was passable at those times by some very adventurous motorists. The omission of the work of the Civilian Conservation Corps (CCC) in Coyote Canyon was not meant to denigrate the organization's work in improving the canyon's accessibility. Further research needs to be conducted to list and evaluate the CCC-era trail and road improvements throughout the park. Moreover, if the CCC-built improvements in Coyote Canyon have retained their historic integrity, then they would have to be protected from adverse impacts.

**#15-68** The Park has never "refused" an offer from the DOD to clean up the Carrizo Impact Area. Two trips organized with legislators' offices were made into the former bombing area this last year and more are planned in the upcoming year, to secure major funding to clean unexploded ordnance from this scenic landscape.

**#15-69:** Thank you for the references. In ecology, as with any field of scientific inquiry, there may be competing claims or apparently conflicting results for any given issue. The studies the commenter has directed us toward do provide some valuable information for livestock management programs. Cattle grazing is not an appropriate activity within a State Park and the majority of the information regarding the effects of cattle on natural and cultural resources supports this policy. Even the studies the commenter references report "significant increases in bare ground on the channel bank and approach due to dry season concentrated grazing" which apparently is the most applicable treatment in the study when considering a desert environment. These references also report that "lightly grazed and moderately grazed wetlands exhibited lower family richness [for aquatic invertebrates] than un-grazed springs at each sample date". Please also note that the studies commenter has referenced do not address potential impacts to cultural resources.

**#15-70:** CSP agrees that vast swings in park visitors during certain times of the year create a demand that cannot be reasonably met. Weekends during the wildflower season can bring so many visitors that there is no place for them to park with widespread traffic slowdowns observed by park staff on existing highways and local roads. Despite seasonal increases in staffing and volunteers, Park staff is unable to provide adequate services or public safety enforcement during these periods. Visitor attendance is almost entirely dictated by the weather--in a good wet year with abundant wildflowers, several hundred thousand more visitors will come to the park than in a drought year with reports of "no flowers." CSP must, instead, plan for accommodating as many visitors as possible while protecting the resources that draw the visitors. This is done without denying entry into the Park overall because of the Park's vast size. Entry may be denied into some preferred areas due to limited parking or camping facilities and seasonal access limitations during these high visitation periods. A similar situation occurs in many State Beaches during the summer months. The commenter and others have questioned the visitor numbers in the Park. CSP has provided the basis for these estimates. Please also see Response # 2-6. The commenter must provide substantial evidence as to why or how these figures are inaccurate.

---

<sup>5</sup> Diana Lindsay, *Anza-Borrego A to Z: People, Places, and Things* (San Diego: Sunset Publications, 2001), 124.

15-66 | This refers to the Title Insurance for the Marston property, which is the 138<sup>th</sup> acquisition  
(cont'd) | by the Department for inclusion in ABDSP. Both of these properties have sections of  
● Coyote Canyon Road.

**Page 2-73**

15-67 | We question the completeness and validity of the discussion of the work the Civilian  
● Conservation Corps. Why isn't the project to build Coyote Canyon Trail into a road  
during the fall and winter of 1933 & 1934 mentioned? This was a significant project that  
should have been addressed in the General Plan/DEIR. The information regarding the  
work on Coyote Canyon Road was called to the attention of ABDSP Historian Alex Bevil  
via conversation during the public participation process for the General Plan and through  
e-mail per Mr. Bevil's request. We provided Mr. Bevil with information to contact a local  
Historian Paul Brigandi for verification of the information offered. Note: On Friday, May  
22, 1925, there is an article from the Hemet News titled "Coyote Canyon by Automobile"  
William Martin and Arthur Winkler drove Mr. Winkler's Buick Coupe from Hemet to  
Borrego Valley by way of Coyote Canyon. This is the first documented use of an  
automobile in Coyote Canyon. It occurred 80 years ago, which was 8 years before  
ABDSP was established. Why were both of these historical events omitted from  
discussion in this document? The period of the 1930's is filled with historical events  
regarding ABDSP, why is the rich heritage of the peoples of the Colorado Desert during  
this time being ignored?

15-68 | On the same page in the discussion of Military and Scientific Activities the document  
● states, "...the more than 27,000 acre Carrizo Impact Area is still closed to the public due  
to the presence of unexploded ordnance." This area contains portions of the Mormon  
Battalion Trail, the Butterfield Stage Route and the Jackass Mail Trail. The Department  
of Defense has offered to clean up portions of the impact area to allow safe passage and  
use of the historic trail. Why has ABDSP refused to support these measures and enter into  
a Memorandum of Understanding that will benefit the public by restoring an historic trail  
alignment that would help future generations understand the important historic events  
that this trail represents. We plan to request assistance from both Federal and County  
Elected Officials to resolve this issue.

**Page 2-78**

15-69 | The document states that cattle grazing has the *potential to* cause extensive damage to  
● natural and cultural resources of ABDSP. This claim is not supported by the latest  
scientific data published in the current issue of California Agriculture, August/September  
2004, including PDF versions of the peer-reviewed research articles in full; these can be  
viewed online at: <http://CaliforniaAgriculture.ucop.edu/>

**Page 2-82**

15-70 | The document states that "public demand has clearly exceeded capacity". What criterion  
● was used to determine this statement? How many school groups are turned away  
annually? How many members of the public have been denied entry into the Park based  
on "lack of capacity"? Could staff working hours be modified to accommodate these  
groups? Can a volunteer staff be trained to meet these demands? The discussion of the

**#15-71** Self-guided brochures are available at the remote trailhead locations. Thirty-five interpretive panels have been constructed throughout the park to provide for remote interpretation away from the main concentrations of visitors.

**#15-72** The definition noted in the general plan is consistent with Webster's 9<sup>th</sup> New College Dictionary that includes the terms "to create anew, restore, refresh."

In using those terms, the general plan is referring to the visitor's experience of Anza Borrego, not the restoration of natural resources. We feel the definition applies well to all the diverse user groups that enjoy Anza Borrego Desert State Park.

**#15-73** The purpose of Focused Use Zones I and II" is not to "reduce the acres available to public use." The plan merely uses zones to depict degrees of intensity of use and development for specific geographic areas. As stated elsewhere, the general plan does not reduce recreational use. In fact, it expands the potential for recreational use opportunities as exhibited by Figure 5.8, Reasonable Projection of Development.

**#15-74** CSP agrees that the restoration of historic routes will provide recreational and interpretive opportunities that allow Park visitors to understand the settlement of the West. The Trails Assessment Team, comprised of a broad spectrum of park users, including two equestrian representatives has identified the Butterfield Stage Route as a potential equestrian and hiking route for future consideration. Upon completion of the GP, the Trails Management Plan will be one of the first management plan ready for implementation.

The Juan Bautista de Anza Trail is open in its entirety within ABDSP. It is considered one of the finest examples of the Anza Trail, in its natural state. There some confusion over the need for preservation, restoration, and adaptive reuse. It must be proved that equestrian use would not pose an adverse effect on historic features along these routes. If it does, then a good-faith effort should be made by all interested parties to find an alternate bypass route if possible. One issue along the Butterfield Route and the Mormon Trail is the fractured public ownership. The recent acquisition of the Vallecito Ranch brought about six miles of previously closed lands into public ownership. This section of the trail is in the planning stages for the Trails Management Plan and it is hoped it can be opened to public use by equestrians, hikers, mountain bikers, and possibly even stage coaches during interpretive events.

15-70  
(cont'd)

current facilities not being large enough to accommodate the public in wildflower viewing season is moot. The vast swings in visitors mean that at certain times of the year there will never be adequate space for all visitors for relatively short periods of time. The number of visitors recorded to have visited the Park has not changed from the first draft of the GP that was released last year. This draft does not substantiate these numbers either. Therefore; we insist that until these numbers are substantiated, they neither be used as a measure of visitors to the Park nor as a basis to support management decisions affecting access to the Park.

**Page 2-84**

15-71

It seems that increasing the number of self-guided trails, including both walking and driving tours would benefit both Park staff and visitors by dispersing visitors through out the viewing areas rather than continuing the current system that encourages the public to start at the visitor center to collect the necessary information for a self-guided tour. This supports the need to provide manned kiosks at the entrances to the Park at least during the active wildflower-viewing season.

**Page2-88**

15-72

Where was the definition of recreation quoted at the top of the page taken from? Both the New World Dictionary of American Language published 1986 and Webster's Dictionary published 2001 do not give definitions 3 and 4 as a direct definition of the word *recreation*. The act of creating anew is the definition of the word *recreate*. Although *recreate* has the same root as *recreation* it is not pronounced the same and cannot be used as a synonym. Nowhere can I find *restoration*, *recovery* used to define *recreation*. Please provide the source for these definitions of *recreation* or correct your document to reflect the correct definition of the word *recreation*. This is just one example of the biased language and references that are used throughout this document.

15-73

The discussion on current Park Visitor Information clearly demonstrates the need for Land Managers to increase and spread out available day-use facilities. There appears to be a very strong need for Park Management to re-think how they handle Park Visitors. The Plan seeks to reduce the acres available to public use through "Focused Use Zoning. This further compounds existing crowding and will, inevitably, increase perceived visitor impacts. Reducing the amount of area open to recreational activities concentrates user activities increasing the experience of feeling crowded. This lessens the opportunity for Park visitors to have a high-quality recreational experience.

**Page 2-90-91**

15-74

The restriction of traditional equestrian cross county use severely impacts the ability for equestrians to recreate important historic events that commemorate a series of cultural events that define the European Expansion into California. This document lists a number of prehistoric and historic routes that traverse the Park. Why has Park Management staff neglected to provide a coherent policy toward the preservation of these historic routes? We, strongly, request that Park Management restore these historic routes and provide recreational and interpretive opportunities that help Park visitors to understand the sacrifices that our forefathers made to settle the West. There is enough documentation

**#15-75** The planning team also has recognized this need. Lack of informational kiosks, especially in the more southern regions of the Park, were the primary reason for creating the “Info/Entrance Zones” at points where main roads cross Park boundaries.

**#15-76** ABDSP provides over 500 miles of primitive roadways providing access to the remote reaches of the park allowing visitors to experience and see the plains, hills, and mountains of the western Colorado Desert. Remnants from the historic past will be left in the State Wilderness similar to manmade remnants, such as historic miner’s cabins, that are left in other wilderness areas. Any more recent remnants would be removed as park staff resources or volunteers are able.

**#15-77** CSP utilizes connectivity for multiple purposes including habitat, wildlife, and trail linkages. The CSP OHV division, in conjunction with other interested parties, is developing the California Backcountry Discovery Trail concept to connect, via backroads, a series of OHV trails that traverse the state from Oregon to Mexico. Designated ABDSP roads (please see Figure 6.6) would be available to highway legal vehicles for such a connection. CSP has embraced the idea of the Trans-County Trail, the Sea-to-Sea Trail, was instrumental in laying out and assisting with construction of the Pacific Crest National Scenic Trail, welcomed and petitioned for designation of the Juan Bautista de Anza National Historic Trail, and laid out, and built the desert section of the CA Riding & Hiking Trail from Cuyamaca to Borrego Springs. When a key private parcel of land at the bottom of the CR&HT was secured in the early 1990s, the park constructed an equestrian parking lot at the mouth of Hellhole Canyon, and built a one-mile connector to bring hikers and equestrians safely to the large trailhead parking area. The Vallecito Ranch acquisition, finalized in Jan. 2004, is the definition of “connectivity”—including habitat, historic trails, watershed, and scenic vistas.

**#15-78** The discussion of Peninsular bighorn sheep (Sensitive Biota 2.2.2.3), discusses this issue, citing Rubin et al. 1998.

15-74  
(cont'd)

available to fully restore the Mormon Battalion Trail. There is also enough documentation to restore the Fages/Butterfield Overland Stage Road. Restoration of these trails will provide tremendous opportunities for historic interpretation. Park staff is clearly failing to fulfill their Fiduciary Duty to ***“represent all the varied scenic, historic, scientific and recreational resources of the region”***. Even the updated Declaration of Purpose states; “...management of Anza-Borrego Desert State Park will be based upon the goal of preserving, instilling an appreciation for, ***and making available these treasured qualities and experiences for present and future generations.***”

The mission of Anza-Borrego Desert State Park is to be ***the premier park in California...inspiring and educating park patrons...***” Restoring and opening these historic trails to their contiguous alignments will meet the vision, the purpose and mission of the Park as stated in the General Plan/DEIR.

**Page 2-92**

15-75

The visitor center currently serves as THE orientation center for first-time visitors to the Park. This needs to change and provide for development of manned kiosks at the Park boundaries to assist the first-time visitor with maps and trail information. This will relieve the stress on the visitor center, even if they are only open and manned during wildflower viewing season.

15-76

There are currently 404,000 acres of the Park classified as State Wilderness. However eloquently this document describes the magical experiences of the desert wilderness, the fact remains that Park lands are not pristine. There are many man made intrusions in the areas proposed for Wilderness designation that should exclude them from such designation. There are historical records and abandoned structures that disprove the statement that most of the land within Park boundaries is pristine. The fact that so much of the Park carries this designation in an area with such harsh and unforgiving climatic conditions means that the majority of Park visitors will never have the chance to experience or even see ***“...plains, hills, and mountains of the western Colorado Desert...”***.

**Page 2-94**

15-77

The last bullet point in section 2.3.3 Regional Planning Influences refers to “Missing Links: Restoring Connectivity to California Landscapes lists a number of organizations including the Nature Conservancy and California Wilderness Coalition. We strongly question the Park’s definition of “connectivity”. Why hasn’t this connectivity been used to restore historic trails? Why hasn’t it been used to preserve the connectivity of trails and roads between towns, forests, and Bureau of Land Management Resource Areas? Why has Park Management not embraced the California Backcountry Discovery Trail concept that would encourage the public to travel through the Park and provide connectivity with other public lands?

**Page 2-95**

15-78

Section 2.3.3.4 state; “Current roads and associated easements are known to fragment biological connectivity. This is documented for female Bighorn and developed roads.”

California State Parks Response

**#15-79** Although impossible to track exact visitor quantity, the visitation numbers are based on Ranger Reports, fee collection stations, visitor center patrons, and other staff/volunteer interaction with park visitors. Such information has been provided to the public upon request. In theory, it is possible that these numbers are lower than is realistic, due to the vastness of the park & visitors who might visit a favorite remote location without interaction with staff or volunteers during their Park visit.

**#15-80** Please see Response #6-2. Access remains open to Bailey's Cabin, Alder Canyon, and Horse Canyon via the Turkey Track Grade near Anza. Yucca Valley and the old trail to Mangalar Spring have been closed to vehicles for decades, almost thirty years. There is no evidence a road between Lost Valley and Coyote Canyon ever existed—possibly an old horse trail or cattle trail, but not an actual road.

15-78  
(cont'd) Please provide the documentation for our review. What primitive roads or trails may be affected by this issue?

**Page 2-96**

15-79 The discussion of visitation of the General Plan/DEIR includes a number of different demographics that define visitors to the Park. It also quotes statistics regarding average Park visitation per year and per month. We have asked before and ask again. How were these figures obtained? Where is the data that substantiates these figures? How have these figures been verified? The methodology of recording visitor numbers to the Park must be fully disclosed as part of an open and transparent process.

**Page 2-97**

15-80 The discussion of public involvement is interesting in that we have been active participants in this process since it's beginning. We believe the decisions that have resulted in this General Plan do not accurately reflect the public input that was given throughout this planning process. Although the authors of the General Plan/DEIR state that this document attempts to balance protection of sensitive natural and cultural resources with providing opportunities for high quality outdoor recreation, in our opinion it fails miserably to adequately provide for reasonable access to over two thirds of the Park. It neglects significant opportunities to educate and inform Park visitors about many of the cultural and historical resources of the Park while decreasing access to most of the Park regardless of prior use. We find this document to be fatally flawed and biased in favor of resource protection at the expense of the public's opportunities to enjoy and be inspired by the outstanding natural resources of ABDSP. According to the results of visitor surveys, Land Managers must support the need to have more dispersed camping areas to lessen impacts of crowding on recreational experiences. "The majority of visitors preferred moderately defined trails with adequate signage. The majority of visitors were accepting of some vehicular activity in Coyote Canyon. Restoration of a throughway in the Canyon will minimize the impacts to the Canyon by eliminating its use as a destination.

We strongly object to the statement, "Intensity of visitor use is not quantified. There is a perception that areas are taken away from public access without supportive data." as we strongly question the validity of data that has been presented to justify Wilderness designations and closure of vast areas of the Park to the average visitor. Complete closure of the Canyon has caused the loss of access to Bailey's Cabin, Alder Canyon, and Horse canyon, loss of access to the primitive road from Coyote Canyon to Lost Valley. The loss of nearly a mile of vehicle access in Yucca Valley, a spur off Coyote Canyon Road above Middle Willows and approximately another mile of route that is a spur from Alder Canyon to Mangalar Spring, west of Bailey's Cabin. We, strongly, question these closures as it is entirely possible to "Cherry stem" routes in Wilderness areas. We, strongly, suggest that Park Managers view the loss of these routes as mitigation for the closure of the 3.1 mile section of Coyote Canyon in conjunction with the 1995 Coyote Canyon Public Use Plan and create an alternate route for street legal vehicle traffic through the Canyon.

**#15-81** Section 2.4.1 is a summary and, therefore, the statements are meant to be broad-based and are not intended to be definitive. The Hydrology section of 2.4.1 of the GP/DEIR will be changed to read: *The number and type of property holdings, the difference in conservation ethics, and the lack of communication, among other factors, have likely resulted in chronic water quality and quantity issues as well as exotic species conflicts over agriculture, golf courses, livestock grazing, tamarisk, and sustainable urban development. These issues are of major concern for water resources in the Colorado Desert.* CSP wishes to clearly state that all owners and users of the watersheds have a responsibility for managing a scarce resource. Communication between all users of the watershed is important to maintain its function and integrity.

**#15-82** There is ample evidence that desert environments are very difficult to restore. Please review the references provided in the soils section of the General Plan for an introduction to this matter.

**#15-83** CSP respectfully disagrees regarding the significance of the magnitude of the human transformation of the southwestern landscape and the implications it holds for sustaining biodiversity through time. Please note the discussions regarding the lasting effects of human activities in Section 2.2.2.3. Please also refer to Comment Letters 28, 34, 38, 44, 46, and 55.

**#15-84** The Mission of the California State Park System is to preserve and protect its cultural and natural resources while also providing high-quality recreational opportunities. Archaeological sites, both prehistoric and historic-period, and historic buildings and structures are the “cultural resources” CSP is required (PRC 5024, CSP Operations Manual, etc. see Section 8.3) to protect and preserve to the extent feasible. Indeed, the California State Public Resources Code (PRC 5024, PRC 5097, & Executive order W-26-92) mandates CSP to be good stewards of these same cultural resources. Most importantly, the visiting public tells us that they care about the State’s cultural heritage, and people want them cared for within parks. Please refer to Comment and Response #15-1. CSP agrees that CSP can play an important role as interpreters of the past. A necessary part of that education process is protecting and preserving the vestiges of prehistory and history for the future; archaeological sites and other historic features represent the tangible evidence of this heritage. Presently, Anza-Borrego Desert State Park<sup>®</sup> offers numerous interpretation programs to the public about the prehistory and history of the park and the greater region. Those programs include (but are not limited to) displays and books at the park visitor center, campfire talks by park staff, lectures open to the public, guided tours to archaeological sites, interpretive programs for local schools, events open to the public featuring free demonstrations and lectures, opportunities to join volunteer organizations, and others. It should also be noted that by law (California Government Code 6254 “Public Records”) the locations of archaeological sites are considered confidential information and not available to the general public. Some archaeological sites within the park are interpreted, however, because the demand by the public is so high and access is relatively easy; these locations are regularly monitored by park staff for evidence of appreciable degradation to its interpretive, cultural, and scientific values.

**Page 2-101**

15-81 Section 2.4.1 discusses what the General Plan authors consider the major issues derived from the General Plan process. Statements on potential negative impacts to soil, geology and hydrology are very broad based and lack specific scientific data to support them. Comments such as lack of conservation ethics or breakdown of communications between a variety of public land management agencies and private citizens are biased, judgmental and arrogant. It appears that Park Managers believe they are the only ones capable of making informed and reasonable conservation decisions.

**Page 2-102**

15-82 We strongly challenge the statement that once damaged desert environments are very difficult to restore. Desert lands in both the Colorado and Mohave ecosystems are dynamic and complex. Natural processes quickly erase most of the transient impacts of the passage of man. This document refers to lack of contiguous historic trails because desert weather patterns, such as, flash flooding, intense seasonal storms and the natural erosion of sandy, gravelly soils have combined to erase most of the signs of human passage. Abandoned homesteads and buildings are quickly reduced to almost unidentifiable rubble. Vegetation washed away by flash flooding re-grows quickly re-establishing unique habitat niches necessary for various species to thrive. Trails and primitive roads need to be repaired or restored after each rainy season often limiting access for the average Park visitor for extended periods of time.

**Page 2-103**

15-83 The claim that ABDSP is among the remnant lands that will sustain wild plants and animals in their native functional ecological systems is simply not true. The California Desert Protection Plan, the Santa Rosa-San Jacinto National Monument and other conservation plans cover most of the areas of the Southern California desert. Hundreds of thousands of acres of the desert ecosystem are currently included in conservation and management plans that cover the entire Southeastern corner of the State.

**In section 2.4.3**

15-84 The General Plan/ DEIR expresses concern that sheet wash, wind and rain scouring, seasonal flooding in washes and side canyons seismic activity, and other natural forces will eventually remove all physical remains of past human use. This substantiates our objection to the statement that once damaged desert environments are very difficult to restore. Why is Park staff choosing to formulate plans to stabilize archaeological sites within the Park in response to natural erosion and degradation? Why are prehistoric remnants of human activities acceptable when more current indications of human use are being erased? Why is there such a disconnect in Park Management planning? The fact that many vehicular routes to existing archaeological sites are closed indicates the importance of the impact of desert terrain on travel routes. Obviously the routes that were chosen by prehistoric peoples are still valuable to the people of today. The value of these sites lies in the education of current and future generations about past cultures and how they dealt with living in the desert environment. They must be shared with Park visitors.

**#15-85** Access to the park and its resources are the highest priority of the Park. Protection of valuable natural and cultural resources is also a very high priority. We agree that interpretation represents an important role for the California State Park System. Please refer to Response # 15-84 regarding the many interpretive programs offered by Anza-Borrego Desert State Park® staff and volunteers, about the prehistory and history in the Park. Note, also, that California State Parks operates several museums, house museums, and historic parks throughout the state that interpret state and local prehistory and history to the public. Cultural preserves will be a focus of future management plans, such as the Roads, Trails, and Camping Management Plans. Each will be addressed as a focus plan, and all processes in the planning will be public ones. We feel that there are no proposals or recommendations in the General Plan that will “limit access” to any areas of the park with cultural sites. Therefore, the General Plan maintains the current level of public access to sites representative of all eras of human history found within the park.

**#15-86** This section acknowledges the unique experience afforded in this desert environment. While CSP appreciates visitors’ sense of safety, it is this same intimidating landscape that makes this Park what it is. The desert is not a haven of predictable circumstances that some would equate with feeling safe. However, by providing many roadside overview points with panorama views, it is CSP’s intent to avail everyone to the desert’s vastness. Further, these expansive views allow both interpretative opportunities as well as protection of what is destroyed with minimal and or unintended human impacts. The commenter has not cited any source for the position taken that “discussion of viewsheds should be limited to those views from the Park boundaries looking in.”

**#15-87** Section 2.4.7 discusses the **existing conditions** of recreational issues. The General Plan does not close acreage to recreational use and the majority of the public during the General Plan process did not advocate substantial increases in park facilities. Guided tours are an important part of the Park concession and interpretive program; however, some visitors do not enjoy the solitude of the desert when a guided tour is at the same location. Large tour groups tend to dominate their surroundings, often adversely affecting other users, and overwhelming restroom and other facilities for a short period. Human waste that is not properly managed is also a reality of park management. As a general guideline for park stewardship, parallel trails can often be eliminated and may have been caused for any number of reasons, not necessarily to provide the visitor with greater privacy. For every visitor that prefers to take a parallel trail, there may be a visitor that is offended by the view of the manmade intrusion that the parallel trail represents. Good park stewardship practice generally reduces the number of parallel trails through restoration and keeps the primary trail in good condition. The General Plan provides direction for addressing these issues in Section 3.3.1.7. Please note Goals Recreation 1 & 2 and Guidelines 1a-b, 2a-d and 2g.

15-85 Recreational activities such as camping, vehicular use, hiking and horseback riding can provide exceptional interpretive opportunities that will strengthen the bonds between past, present, and future generations. Rather than establishing limited access to Cultural Resource Reserves, all necessary efforts to enable Park visitors to experience connection with past Park inhabitants should be a high priority. This would truly make the Park mission, “to be the premiere park in California...inspiring and educating park patrons, and serving the needs of the public...”

**Page 2-104**

15-86 Section 2.4.4 discusses aesthetic resource issues that are purely subjective in nature and are not quantifiable. The biased mindset that views any and all activities of man as negative impacts has no place in a General Plan for management of a State Park. Statements such as, “indiscriminant footpaths and roads form artificial lines that slash across the textures and subtle lines of the desert.” are biased and unfair. To many Park visitors the existence of such lines creates a sense of safety, a pathway to escape the rigors of the desert climate if needed.

The discussion of viewsheds should be limited to those views from the Park boundaries looking in. There are a plethora of viewsheds within the 640,000 acres of rugged terrain that makes up ABDSP to satisfy the visitor’s sense of isolation and the Park’s wilderness qualities.

**Page 2-105**

15-87 Section 2.4.7 discusses recreational issues. If there are concerns regarding potential conflicts between some active and passive uses of the Park in “shared use” areas, the potential to increase these areas in size needs to be made a much higher priority than this draft of the General Plan/DEIR considers. Careful survey of Park lands and opening more acres to recreational use is critical to dealing with “shared use” conflicts. ABDSP has great potential to take advantage of its unique terrain to accommodate greater numbers of visitors and still maintain a sense of wildness and solitude for Park visitors. The limits set by this draft of the General Plan/DEIR for more developed camping facilities will clearly not support the perceived increase in Park visitors in the future. More and better located developed and semi-primitive campsites can give more visitors the uncrowded solitude they come to the desert for. There are many reasons for increasing dispersed recreational use. Legal activities will provide a presence in the Park that will lead to a decrease in the negative activities such as drug trafficking, immigration, rave parties, vandalism etc.

The bullet point that singles out guided tours and lumps this together with the leaving of human waste is a gratuitously biased, unfair and a rude statement. Why would guided tours be considered a negative impact? Concessionaires can improve Park patrons experience, help control visitor impacts and provide additional eyes and ears to help Park staff monitor Park patron behavior and safety.

The bullet point that refers to parallel or duplicate routes of travel begs the question, why have these routes developed? Unless these trails are in extremely close proximity to each

California State Parks Response

**#15-88** A significant number of prehistoric archaeological sites found within Anza-Borrego Desert State Park® are located in areas with loose sandy sediments or upon terraces of desert pavement. These sites, being a part of these dynamic landscapes, are susceptible to appreciable damage when driven upon by vehicles or ridden upon by people on horseback or bicycles. Trampling by vehicle, horses, bikes, or people displaces artifacts and cultural features (e.g., fire hearths, roasting pits, tool manufacturing areas, etc.) lying on or near the surface, both vertically and horizontally (Please see Section 8.5). Experiments and on-site studies reported in the scientific literature have demonstrated the extent of artifact damage caused by animal and human trampling and by vehicles. The effects of trail use, camping, roads and other activities will be investigated during the production of Management Plans, as outlined in the “Future Planning Efforts” section of the General Plan. Public comment will be sought during work on these Management Plans. It should be pointed out, too, that certain locations of the park are considered too culturally sensitive to permit recreational activities, e.g., human burial locations, places held sacred by local Native Americans, or sites with one-of-a-kind cultural remains. Please also see Response # 6-16. The Envirohorse website addresses equestrian activity on trails. It does not address off-trail use. CSP’s concern regarding off-trail equestrian activity and natural resources is addressed in Response #6-16. Off-trail equestrian activity is generally not allowed within lands classified as State Park and this General Plan is keeping with that standard State Park policy. The statement in the Preliminary GP on page 2-107 will be changed from “...causes significant resource damage” to “...may cause resource damage.”

**#15-89** Management of staffing and budgeting is an ongoing process in conducting any business, State Parks included. Communication is considered very good in the backcountry with the introduction of the 800MHz Regional Communications System radios. State Park Rangers can readily communicate with the San Diego County Sheriff’s, ASTREA helicopter, Mercy Air helicopter, County Communications Network, Heartland Fire System, and even CHP, through the County System.

**#15-90** CSP does seasonally adjust the staff and volunteers. However, a good wildflower year will bring out more weekend visitors than the park staff can effectively manage, in terms of services and public safety. On the subject of encouraging concessionaires to conduct tours, CSP solicited proposals for four wheel drive tours and signed one in 2003, which has been quite successful, and another in the Summer of 2004, which is scheduled to begin operations soon.

**#15-91** CSP respectfully disagrees. Both Sections 2.4.8 and 2.4.9 address existing conditions neither of which state that Park staff is unable to efficiently patrol and monitor existing acreage on a continuous basis. The use of the Park aircraft enables park operations to cover vast areas of the park. The statement in Section 2.4.9 simply indicates that these resources, when located on land in private ownership, are neither available to the public nor protected from potential adverse impacts.

**#15-92** In order to clarify the intent of the sentence, the word “*remnant*” will be replaced with “few remaining undeveloped.” CSP respectfully disagrees that the description of ABDSP as a refuge with ecological systems critical to maintain wildlife diversity in the future is misleading or unfair. However, of the nearly 100 million acres of land in California, ABDSP can correctly be termed a remnant.

**#15-93** On page 3-41 the General Plan further clarifies the intention of CSP by stating, “Recreation and preservation are not on opposite ends of the scale. At ABDSP, preservation is an integral part of a successful recreation program.” Visitors drive, ride, hike, and lounge to enjoy

15-87  
(cont'd)

other, this statement is just not true. Parallel or duplicative routes that are separated by vegetation or terrain can increase the visitor's experience of solitude by dispersing visitors over a wider area of the Park increasing the opportunity for each individual visitor to seek and enjoy solitude.

**Page 2-106**

15-88

We strongly object to the statement, "taking horses off designated roads and trails causes significant resource damage." Although the sentence is structured incorrectly to express Parks' intent, their intent is clear: They are stating horses i.e. equestrian use, cause significant resource damage. How many hoof prints and other marks of horse passage in dry washes and cross country remain after the rainy season? The Envirohorse website has some excellent, current data on the impact of horses on the environment. The same applies to single-track mountain bikers. Park Management must prove the impact through trail measurements, rutting and erosion before and after rainy seasons. They must, also, provide photographic proof of impact.

**Page 2-107**

15-89

Section 2.4.8 discusses the issues of facilities and Park operation. There are so many improved communication technologies that Park staff must be extremely pro-active in seeking out better communication systems. The potential to establish additional cellular telephone towers and to use satellite linkages more effectively can correct this concern.

15-90

The cyclical nature of Park visitation can be addressed by carefully monitoring staff scheduling and use of seasonal, temporary and volunteer staffing during periods of high visitation. Some of the concerns regarding Park visitor safety can easily be addressed by encouraging concessionaire guided tours and volunteer patrols.

**Page 2-108**

15-91

Section 2.4.9 discusses land acquisition issues and implies that the fact that land adjacent to the Park is privately held unfairly restricts the ability of the citizens of California from enjoying valuable cultural and natural resources. The stated "preservation, protection agenda evidenced in this document appears to create far greater restrictions on the citizens of California than adjoining private property. According to statements made in section 2.4.8, Park staff is unable to efficiently patrol and monitor existing Park acreage; therefore additional land acquisitions are unreasonable. Land acquisition must have the lowest priority in this General Plan/DEIR.

15-92

Section 2.4.10 discusses the impacts of adjacent land uses on the Park. We find the first statement that reads, "...leaving ABDSP among the remnant lands that will sustain wild plants and animals in their native functional systems," unfair and misleading. California alone has 130 Wilderness areas totaling 14,085,258 acres. Neighboring States, such as, Nevada (42 Wilderness areas 2,123,434 acres, Arizona (90 Wilderness areas (4,528,913 acres) and Utah (6 Wilderness areas 4,005,712 acres) all have protected desert ecosystems within their respective Wilderness areas. The California Desert Protection Act set aside over 1.5 million acres of desert and mountain ecosystems in Southern California. Linkages exist from the Mexican and Arizona border to the Sierra Nevada Mountains and

## California State Parks Response

**#15-93 cont.** the scenery, quiet, wildlife, night skies, geology and learn about the plants and history, to name just a few. The degree, to which these values are maintained, even enhanced, has a direct relationship on the quality of the visitor's recreational experience. There is no denigration of recreation intended. Instead, the Plan raises the banner of recreation as one of the principal reasons for effective resource management. Because CSP disagrees with the commenter's position, CSP cannot answer the other questions.

**#15-94** These resources are sensitive to public use. This General Plan is the product of a process that incorporates the input of a broad range of classifications employed by CSP, as well as extensive public involvement. Cultural resources (prehistoric and historic archaeological sites and historic buildings) are susceptible to damage from natural forces and public recreational activities. There is ample documentation from site records and archaeological reports of work in ABDSP and from Ranger reports providing evidence of damage to cultural resources by vehicles, trail use, camping, uncontrolled cattle grazing, vandalism (e.g., unauthorized collection or excavations, spray paint, campfires, etc.), and natural forces. There are reports produced by BLM and USDA Forest Service personnel that document damage to archaeological sites in their respective jurisdictions caused by recreational activities, vandalism, and animals (e.g., *Impacts: Damage to Cultural Resources in the California Deserts*, 1980 by Lyneis, Weide, and Warren). Also see Response # 15-88. The statement you quote on page 3-4 makes no recommendation that certain trails, roads, or camping locations should be closed to public use, but does imply that State Park staff should be watchful for evidence of resource damage so that such damage can be treated.

**#15-95** Please see Responses #6-2, 6-7, 6-11, 15-7 and 15-11. The General Plan is consistent with PRC 5019.53. CSP respectfully disagrees that the road through Coyote Canyon did not produce a major modification to lands, the riparian forest, and waters. The closing of Coyote Canyon to vehicular traffic has been decided, is not part of the project description of this GP, and is no longer subject to the purview of CEQA at this time.

**#15-96** The Park Mission Statement and objectives do not "fail to include recreation". In fact, the importance of recreational use permeates the entire mission with the following statements: "...serving the needs of the public..." "...provide facilities consistent with the enjoyment of the Park..." "delight park visitors." In addition, it is inappropriate to view the Mission Statement independent from the Park's Declaration of Purpose, which states, "...provide opportunities for high quality recreation..." and "...making available these treasured qualities and experiences for present and future generations."

**#15-97** Many of the commenters questions would be appropriate at the level of specific management plans and projects, but this is a program level General Plan. It is intended to set a long-term management vision with goals and guidelines that will still be relevant in the future. Vision statements are just that: visionary.

Within the park's vision statement- recreation is infused throughout. Consider the included language such as: " 'awe', 'inspiration', 'refuge', 'seeking enjoyment', 'delighted', 'enhancing experience', 'access unique and special areas', 'experience true, real, tangible desert environment', 'uncertainty', 'discomfort', 'personal insight and perspective gained by first-hand knowledge', 'ability to camp', 'find silence and total darkness' ". This language is directed toward describing the experience of recreation. In fact, it effectively describes the list of values indicated almost universally by park users at our first public meeting for this General Plan in Borrego

15-92  
(cont'd) | the Mohave Preserve, therefore the statement, “remnant lands” is incorrect, unfairly biased and inflammatory. It must to be dropped from the final document.

**Page 3-3**

15-93 | The very narrow definition of “high-quality recreation” as that which is completely dependent on the “high-quality” of the natural and cultural resources within a State Park is unacceptable. This still places preservation at a higher priority than recreation and will continue to place unfairly harsh restrictions on public access. What empirical data exists to substantiate this assertion? How was the data to support this definition gathered? What objective observations is it based on? Is the data reliable? It is repeatable?

**Page 3-4**

15-94 | The concept that “significant natural and cultural resources are ‘extremely sensitive’ to public use is a very biased and subjective perception. These resources have lasted for thousands of years. If the visiting public takes reasonable care they will last for thousands more or until the next earthquake or flash flood.

15-95 | Public Resources Code 5019.53 states, “...*Improvements undertaken within state parks shall be for the purpose of making the areas available for public enjoyment and education...improvements may be undertaken to provide for recreational activities including, but not limited to, camping, picnicking, sightseeing, nature study, hiking, and horseback riding, so long as such improvements involve no major modification of lands, forests or waters...*” This Preliminary General Plan/ Draft Environmental Impact Report does not support these objectives. It is, therefore, flawed and must be revised to encompass **all** the objectives contained in the PRC. Any additional withdrawals of lands within the Park to Wilderness status do not support these objectives. The history of vehicular traffic through Coyote Canyon has not produced a major modification of lands, forests, or waters. Therefore, this access should be restored as it will allow those less able to hike, bike or ride horseback a way to enjoy and learn about Park resources. Further, revision of this document must include a thorough review of the rule of law, transfer deed stipulations and mandates that established and expanded the Park to its current size.

**Page 3-7**

15-96 | The Mission Statement for Anza-Borrego Desert State Park as stated in this General Plan document is unacceptable. It completely eliminates recreation as an objective in Park management. Both the Mission Statement and Objectives fail to include recreation. It is therefore incongruent with the California State Park Mission Statement and must be changed.

**Page 3-8**

15-97 | The Park Vision Statement states...”Emphasis is placed on having park visitors experience the true, real, tangible desert environment...” What criteria will be used to define these terms? How can this experience be measured and evaluated? All of these terms are vague and subjective. The Vision Statement goes on to say;”...as long as it does not...compromise park resources.” How is the phrase “compromise park resources defined? What criteria are used to determine if park resources have been compromised?

**#15-97 (cont'd)** Springs in 2000. The visitor survey produced for the General Plan, as well as, visitor surveys conducted more informally by park staff, demonstrate that the vast majority of visitors to Anza-Borrego Desert State Park® are drawn here because of its scenic beauty, the solitude, the opportunity to experience nature in a tangible sense, and similar sentiments. Comments made by members of the public who attended the General Plan Public Meetings share similar sentiments. CSP believes the park Vision Statement accurately reflects what the park offers and what most of the public seek in coming to the park.

The sentence with the phrase “compromise park resources” in the context of the Vision Statement indicates that recreational activities, such as camping, will continue throughout the park. However, if measurable damage to resources was observed by park staff at a location (“resources” in this context include, scenery, geologic features, soils, archaeological sites, plants, animal habitat, watercourses, the night sky, etc.), that area might be closed to recreational use. Studies conducted in the public lands of California and other parts of the country, including, the deserts, provide good baseline data on damage caused by visitors and useful techniques for measuring such damage. Such efforts by State Park staff to monitor resources and treat problems as observed is also mandated in Department policies, such as the *Resource Management Directives*.

**#15-98** The Focused-Use Zones concentrate high impact activities and development into specific geographic areas in order to minimize the effect of these intensive functions on the visitor’s experience of the rest of the park. The Focused-Use Zones will not “crowd the majority of Park patrons into small, highly regulated areas.” Instead, these zones will be the base from which visitors continue to enjoy recreational activities in the surrounding hundreds of thousands of acres.

**#15-99** Please see Response #15-9.

**#15-100** CSP respectfully disagrees. As California’s population increases and open space is lost to urbanization, the need for undisturbed areas, such as State Wilderness, increases. CSP has received many comment letters ( # s 7-12, 22-23, 26-28, 33, 38, 40, 44-49, 52-53, 56) in favor of the increase in State Wilderness.

**#15-101** Language in the General Plan/EIR was inserted to clearly disclose any potential impact to recreational uses that may occur with future management plans. These road closures would not occur because of the designation of new State Wilderness (Please see Responses #6-2 & 6-7) but because of the need to reduce impacts to the Park’s resources. New Wilderness designations may eliminate the options to develop new roads, however. Options for realigning or constructing new roads will be addressed in the Roads Management Plan.

**#15-102** The proposed Wil-ye Wilderness is adjacent to the “oldest historic Right-of-Way road in the state.” There are no roads that traverse it at this time. Also, the Fages/Anza Trail is not a dedicated “right-of-way,” which, according to Webster’s Dictionary, “is the strip of land over which is built a public road.”<sup>6</sup>

**#15-103** The Scissors Crossing area of Anza-Borrego Desert State Park® has a long and

---

<sup>6</sup> *Merriam-Webster Online Dictionary*, <http://www.m-w.com/cgi-bin/dictionary?book=Dictionary&va=right+of+way>. Merriam-Webster, Incorporated, 2004.

15-97  
(cont'd) How have these criteria been developed? By whom? Who will be responsible for determining if park resources have been compromised? What corrective actions will be taken if park resources are considered to be compromised? What objective scientific studies have been conducted to measure what constitutes activities that compromise park resources? The Vision Statement is flawed and incomplete in that it does not once acknowledge that recreation is a component of future Park management. Therefore it must be changed to be congruent with the California State Park Mission Statement.

**Page 3-9**

15-98 Sections 3.2.4.2 and 3.2.4.3 establish Focus-Use Zones that will crowd the majority of Park patrons into “small, highly regulated areas” this is clearly unacceptable. Establishment of these zones violates the California State Park Mission, the Anza-Borrego Desert State Park Declaration of Purpose, the Anza-Borrego Desert State Park Mission Statement, and the Anza-Borrego Desert State Park Vision Statement. Therefore they must be dropped from consideration as part of the General Plan.

**Page 3-13**

15-99 Section 3.2.4.4 defines a Backcountry Zone that is not clearly defined and has no statutory support; therefore, it must be removed from consideration in this document.

**Page 3-15**

15-100 Section 3.2.4.5 refers to PRC (5093.31), the purpose of Wilderness is to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas on state-owned lands within California...” The fact that California currently has 130 Wilderness Areas that cover 14,085,258 acres will ensure that this section of the PRC is adequately met. There are additional acres that are held in relatively natural condition in state, county and city parks. Additional Wilderness designations with their attendant restrictions on human accessibility and enjoyment are unnecessary. There are already sufficient protections in place through the State Legislature, State Resource Agency, and the Department of Parks and Recreation with the support of the California Environmental Quality Act.

15-101 We strongly object to the language in the General Plan/DEIR that implies potential road closures or realignments based on current and future potential Wilderness designations. The option to cherry stem existing roads is not addressed in this document. This language must be added.

15-102 The proposed Wil-yea Wilderness area does not meet the criteria for designation as Wilderness. It is not roadless. It contains the oldest historic Right of Way road in the state. There are spur roads off this Right of Way that pre-date the establishment of the Park. Additionally, there are many signs of mans presence and actions on the land such as structures, fencing and irrigation lines.

**Page 3-17**

15-103 Section 3.2.4.6 discusses the establishment of a Cultural Preserve located in the western-most wedge of “Scissors Crossing” (the intersection of County Road S-2 and State

**#15-103 (cont'd)** significant history which warrants the creation of a Cultural Preserve. The value of the historic trails is not lessened as a result of the Cultural Preserve designation. Indeed, the preserve status enhances its importance to the park and to the public served by the park. This sub-unit classification does not affect use of the California Riding & Hiking Trail, the Pacific Crest Trail, or any other established riding and hiking trail. The historically significant trails that passed through the park are interpreted in several places within the park; large segments of these historic routes are even open for hiking, riding, and viewing. CSP understands the cultural significance of the historic trails, and interpretation of their history. Presentations that discussed the results of the Archaeological studies at this site were given in a free public forum during Archaeology Weekend (February 15-17, 2004) at ABDSP. Please also refer to Sections 3.2.4.6, 3.3.1.4, 3.3.1.5 Goal Interpretation 1, Goal Primary Theme 4, and 9.2 of the GP/EIR

**#15-104** CSP has, and will continue to acquire and assess all appropriate information on which to base our management decisions. As previously stated, the GP is a program level document that provides guidance for future information gathering and decision making.

**#15-105** . Guideline Data 1a addresses “carrying capacity”. CSP is charged with identifying the “carrying capacity” of sensitive areas and potential adverse environmental effects that may occur with greater numbers of visitors as trustee of the public’s resource. Carrying capacity refers not to total numbers visitors but to the ability of particular areas to absorb the effects of visitor use. The more fragile and sensitive an area, the lower its’ carrying capacity. Carrying capacity can also be increased by the redirection of recreational uses to appropriate locations or types of uses.

**#15-106** The Resources Inventory, referenced in this document, contains information about the area hydrology. Many of the Goals and Guidelines are general in nature and supported by generally accepted standards for watershed management. The commenter has provided not substantial evidence with which to question the data, analysis, and conclusions in the EIR. Please also refer to 8.3.

**#15-107** CSP respectfully disagrees. Please see the References section of the General Plan for scientific documentation and studies used in preparation of the Plan.

The “rule of law” that established the park is represented by the State Parks Mission statement, which includes as a primary element, the responsibility of helping to preserve the State’s extraordinary biological diversity.

15-103  
(cont'd)

Highway 78) in the San Felipe Valley. This area is a natural crossroads that has been used for literally thousands of years. It is an unreasonable and irrational decision to establish a Cultural Reserve in this area, since “an extremely low-level of visitor impact is desired for this area.” While pre-historic vestiges of Indian culture are important, so are historic uses such as the Mormon Battalion Trail, the Southern Emigrant Trail and the Butterfield Stage Route. It is extremely important to value all the uses of this regional transportation crossroads. The primary focus of this area should be on interpretation and education of this and future generations.

**Page 3-18**

15-104

Section 3.3.1.1 states that detailed site-specific data is often unavailable. The Park has been available for scientific research since 1933. How have land management decisions been made in the past 71 years if there is a lack of scientific data to base them on? How can resource integrity be determined to be in “imminent danger” if the scientific data is so scarce? Many decisions appear to have been made without unbiased site-specific data. Please provide documentation of all delays in management actions that have resulted in costly damage or irreversible loss of sensitive habitat or species.

**Page 3-19**

15-105

Guideline- Data 1a states “A range of actions for resource protection could include closure or relocation of visitor use areas, permanent or seasonal closure, access by lottery, permits, interpretation/education, institution of restoration projects, etc.” How does this guideline comply with the purpose for which ABDSP was established? How does it comply with the Keene Collier Act, the Dunlap Bill, and Public Resources Codes, the State and Federal Historic Preservation Acts and the California Environmental Quality Act? What is the authority that establishes the right to allow access by lottery decisions? Please provide the statutory support for this action.

**Page 3-20**

15-106

The discussion of hydrology is fatally flawed as there appears to be no scientific basis for the conclusions reached. Please provide all documentation and scientific studies by licensed hydrologists that support these goals and guidelines.

**Page 3-23**

15-107

The discussion of the present rate of decline and extinction of plants and species is the subject of great debate. Even the basic data regarding the number of species is suspect. All of the data used to support the “global biodiversity crisis hypothesis” stems principally from eight prolific scientific authors whose data has been questionable since it was first published. The presence and proliferation of such top predator species as mountain lions and wolves indicates that ecosystem health is improving. The “biodiversity crisis” is not substantiated by verifiable data. Observational data does not support the modeled data that is recited regularly as fact. California State Parks is not qualified to determine situations where State and Federal environmental legislation is not adequate to protect native biota. By their own admission, they lack the detailed site-specific scientific data to make science driven decisions. They must manage the lands in their care according to the rule of law that established the Park.

**#15-108** As stewards of the Park and per CSP's *Mission*: future park managers must address the potential loss of native biota and whether or not that decline is subject to human actions.

**#15-109** It is understood that exotic plant species are spread through a variety of methods. The sentence merely states that visitor uses are "thought" to contribute to the spread of some exotic species. However, park managers must be concerned with the extent to which visitor uses contribute to exotic species invasion. Please see Guideline 1b under Exotic Biota Goal 1 which states that studies will be done on this issue.

**#15-110** CSP has, and will continue to acquire and assess all appropriate information for which to base our management decisions.

**#15-111** Tamarisk removal in the park is accomplished as much as possible using mechanical/manual means. Chemicals are only used when success for eradication requires their use. There are two types of chemicals approved by the State for use. Garlon 4, a topical systemic herbicide with a vegetable dye additive, is used directly on individual plants outside of aquatic areas. This chemical breaks down in the soil as it oxidizes. Rodeo is used in aquatic habitats as approved and has no surfactant. All applications of herbicides are prescribed by a certified pesticide applicator. The volume of records associated with the parks herbicide application program are not appropriate to include here. All aspects of the use of herbicides by the Park, from purchase, storage, handling, training, to application are inspected and approved annually by San Diego County, according to State law. The application of pesticides, herbicides, etc. for tamarisk removal is implemented consistently with State law and with no evidence of abnormal damage. This application is not an impact generally covered under CEQA or is exempt from CEQA (Sections 15301, 15304, or 15333).

**#15-112** The State Park System has a trained cadre of fire specialists. The burn team works very closely with CDF, USFS, BLM, and local fire departments to both fight wild fires, and to conduct prescribed fires to reduce fuels, enhance habitat, and protect surrounding neighboring lands. The Colorado Desert District has been heavily involved with fuel management in Cuyamaca Rancho State Park following the Cedar Fire, and in forest thinning at Palomar Mountain State Park to hopefully prevent a catastrophic fire there. A wildfire management agreement was recently signed between CDF and Anza-Borrego.

**Page 3-24**

15-108 | Guideline-Biota 1d states, “Management strategies will be developed to counteract declines or loss of native biota if those declines are the result of human actions and appear to indicate a compromised native species or ecological system.” We have strong concerns about this guideline. It needs full careful oversight. Management strategies must mitigate these stated concerns without compromising the pre-existing purposes, laws, and deed stipulations that are the foundation for establishment of the Park. This guideline is very subjective. Any changes to management strategies must be based on current science based data.

**Page 3-25**

15-109 | The statement “Visitor uses such as equestrian activity, camping, vehicular use, and hiking are thought to contribute to the spread of some exotic plant species” ignores the many other methods that plant seeds are spread. Migrating birds are known to spread exotic plant seeds along their associated flyways. Atmospheric conditions and exceptional weather conditions such as tornados uproot plants and their seeds pushing them high into the upper atmosphere to be deposited hundreds or perhaps thousands of miles away from their point of origin. Flash floods and windstorms carry plants and seeds many miles before depositing them in new locations. Singling out recreational visitors to the Park is not supported by reliable repeatable science.

15-110 | Guideline-Biota 1h states, “Extirpated species may be re-introduced pending a detailed feasibility assessment to determine whether it would be appropriate given visitor uses and data that the Park could support the species.”  
Again we are very concerned with the process by which this feasibility assessment will be conducted. Due to issues such as the lack of substantive scientific data to support the closure of a 3.1 mile section of Coyote Canyon and removal of the Wild horse band before commissioned observational studies were completed suggest that Park Management is being driven by something other than sound verifiable scientific data.  
This must be changed.

**Page 3-26**

15-111 | Guideline-Ex. Biota 1d states, “...continue efforts to remove tamarisk from riparian areas, springs and cienagas...” please provide the Material Safety Data Sheets (MSDS) of the chemicals and herbicides used to treat tamarisk in the Park. Please provide the dates and sites of all applications of these products as well as invoices for all purchases. Please provide a list of all species within one mile of the target species treatment along with a report of the potential long-term effects on them. Please identify the process used to authorize the use of these defoliants. What agencies agreed to the use of these chemicals within a state park?

**Page 3-27**

15-112 | Regarding the entire discussion of fire management we have grave concerns about the ability of current Park management staff to work cooperatively with other agencies in the event of the outbreak of wildland fire. We strongly suggest that past actions of Park staff be reviewed in regard to cooperation with other agencies in recent emergency wildland

**#15-113** CSP will work to open Vallecito Ranch, the Lucky 5 Ranch, and the Tulloch Ranch to the public and to provide trail linkages to Cuyamaca Rancho State Park, the PCT, and the California Riding and Hiking Trail, through the Trails Management Plan and the Roads Management Plan. The Trails Assessment Team has worked with a broad spectrum of user groups to formulate material for a draft Trails Plan which will be finalized after completion of the General Plan.

**#15-114** Many historic routes of travel were identified during the Resources Inventory for the park. All specifics of moving, closing, or maintenance of roads, trails, and camping locations will be dealt with in the Trails Management Plan, the Roads Management Plan, or the Camping Management Plan.

**#15-115** The General Plan creates Goals and Guidelines that, by their very nature, are used as planning concepts that address a broad range of issues. Please also see Response #15-13. Much of the issue addressed in the 4<sup>th</sup> bullet on page 3-32 will be addressed in subsequent management plans and will be subject to CEQA compliance.

**#15-116** California State Parks is mandated to preserve historic resources as its first priority, then to interpret their role in the State's historic development. The Park is working with the Native American Land Conservancy to acquire sacred lands, and to provide for use by Native Americans for their long-held sacred customs and ceremonies, as well as by all citizens. The public will have ample opportunity for input during the processes of the Trails Management Plan, the Roads Management Plan, and the Camping Management Plan, which will all address this issue.

**#15-117** Please see Response #15-25.

15-112  
(cont'd)

fires. We view formation of an effective multiple agency fire management plan as extremely critical. While there may be circumstances where prescribed burns may be viewed as essential to ecosystem health, we feel strongly that fire is only one factor in an effective fire management plan. This planning is essential given the extended drought conditions and hazard of uncontrolled wildland fire within and adjacent to ABDSP boundaries.

**Page 3-28**

15-113

Please provide the criteria or framework Park staff proposes to use to acquire additional properties to enhance landscape linkages. How will the proposed General Plan/DEIR affect access to private properties that are considered to provide landscape linkages?

**Page 3-30**

15-114

Guideline-Cultural Resources 1b states, “conduct research on known roads, trails, natural corridors and segments of routes of travel to identify their builders...” Not all historic routes have been identified. Segments of historic routes should be defined as clearly as those routes that traverse ABDSP. These historic routes should link to their historic alignments beyond Park boundaries. This General Plan/DEIR is incomplete because it lacks a clearly defined maintenance plan for all routes and trails. Although we support care for the cultural resources of the Park, we insist that any mitigation measures, such as, site-specific closures and moving of roads, trails or camping locations result in no net loss of roads, trails or access.

**Page 3-32**

15-115

With regard to the 4<sup>th</sup> bullet point states, “ identify procedures for careful planning of new roads, trails, day-use facilities to avoid or at least minimize adverse affects to historical resources within the Park” in our opinion, these procedures and the process for determining adverse affects must be developed and included in the General Plan/DEIR document. The criteria and process for determining adverse affects must be subject to public review.

**Page 3-33**

15-116

Guideline-Cultural Resources 4b: states, “other management actions to protect these areas may include re-routing trails or roads, road closures, relocation of parking, trail heads or other visitor facilities...” we strongly suggest that the preferred management action be re-routing of roads or trails. We strongly suggest the public be involved in the decision-making process. There are times when the opportunity to interpret an historical cultural resource should take precedence over preservation. ABDSP contains a wealth of historic resources that can be used to help Park patrons to reconnect with their forefathers and better appreciate their efforts in settling California.

**Page 3-35**

15-117

Goal – Interpretation 2 states, “include outreach efforts to develop partnerships with and support from the community for interpretive programming and environmental education.” Why are no recreationally based organizations included as potential partners? Literally every recreational organization that patronizes the Park has an environmental education

**#15-118** CSP will invite public organizations and volunteers to assist in the development of interpretive themes, particularly if the theme coincides with the volunteer's or organization's expertise or interest.

**#15-119** Because the General Plan is goal and guideline oriented, these terms would apply to the applications of the goals and guidelines listed in the General Plan. In reality, not all goals can be met because of conflicting issues, hence the qualifying terms of "where feasible" and "appropriate user groups". It is a matter of fitting the unique situations that arise in the future to the General Plan's guidance. Park management looks forward to working with community groups as outlined in Sections 3.3.1.8 and 3.3.1.9.

**#15-120** These suggestions are intended to provide some potential solutions that are employed by land managers.

**#15-121** California State Parks respectfully disagrees. Please see Response # 119. CSP has undertaken many capital improvements to update park facilities to meet the Americans with Disabilities Act. Further, all future projects are subject to ADA requirements and review by the CSP Accessibility Unit and local Disabled Advisory Groups. CSP is committed to providing equal opportunity to all programs. The terminology "feasible and appropriate" when used in the context of Guideline – Recreation 2b, addresses that CSP will work with such groups should the issue be of merit or interest to these groups.

**#15-122** As addressed above, the park works closely with the CDF and USFS. Five chapters of the Backcountry Horsemen of California work closely with the Park to maintain the Coyote Canyon Trails.

15-117 (cont'd) component such as “Tread Lightly”, “Leave No Trace”, “Adopt-a-Trail” and locally developed programs that can engage a much larger group of volunteers and benefit interpretive programs by introducing much more diverse perspectives of the Park.

**Page 3-36-37**

15-118 We appreciate the wide range of interpretive themes provided in this document and look forward to opportunities to assist in their development and execution.

**Page 3-41**

15-119 In response to the discussion of recreation, we whole-heartedly agree with the statement that “recreation and preservation are not opposite ends of the spectrum. It doesn’t matter how Park patrons enjoy visiting the Park, they are drawn by the desire for similar experiences that cannot be found in the urban/suburban setting. ABDSP holds a fascination and beauty that cannot be denied. We are concerned about phrases such as “where feasible” and “appropriate user groups”, being used without clear definition of these terms. Please provide clear definition of these phrases and the intent behind their use.

**Page 3-42**

15-120 Guideline-Recreation 2a states: “If necessary, carrying capacity for given locations may be established and visitation limited to seasonal access or by lottery, some locations may require closure to certain types of activities.” We strongly object to the insertion of new concepts such as use of a lottery system to access certain sections of the Park. Park staff has not, to date, provided sufficient hard scientific data to prove that Park landscapes are suffering anything other than very subjective perceptions of impacts. The often stated agenda of Park Management staff and superintendents is to close roads and access to such unique historical routes, such as, the Coyote Canyon Road is unreasonable and unacceptable. We have documentation to substantiate the agenda of road closures and removal of public visitation opportunities without public review that extend back to October 26, 1995. This documentation substantiates the lack of factual evidence to support closure of the Road for environmental reasons.

**Page 3-42**

15-121 Guideline-Recreation 2b: states, “Work closely with recreational and disabled advisory groups to ensure that their specific needs are addressed and incorporated into management decisions where feasible and appropriate.” We object to the language, “where feasible and appropriate”. This language clearly echoes a Park that is delinquent in addressing compliance with the Americans with Disabilities Act. It also limits lawful recreational activities without defining or explaining their impacts.

**Page 3-44**

15-122 Goal-Leadership 1: states, “Act as a leader among agencies and groups that are active in providing recreation and preservation by nurturing partnerships and advocacy of the Park’s Mission.” We, who represent more active recreational groups, have worked diligently to nurture partnerships with Park Managers. We have not seen any such leadership exercised by current Park Management staff. They have been adversarial with

**#15-123** The park needs and values are defined in the General Plan Goals and Guidelines. Therefore, consistency will be defined by a program or volunteer project that utilizes the Goals and Guidelines across all disciplines. Many of the values have come from public comment as evidenced by the supporting comment letters.

**#15-124** Thank you for the suggestion and we will look in to contacting said agencies in regards to such programs. The park is working with CORVA and Tierra del Sol presently to maintain washed out primitive routes in ABDSP.

**#15-125** Although CSP welcomes public input, not all grants will entail the need for an advisory committee made up of stakeholders with a broad range of viewpoints. Some projects, such as a grant for removing exotic vegetation would solicit help from volunteers or organizations with a similar expertise or interest. Certainly projects that involve controversial or diverse subjects would benefit from the partnership of stakeholders with diverse viewpoints.

**#15-126** As trustees of the public resources on State Park land, park managers are responsible for defensive planning. Defensive planning does not dictate uses on lands outside the park boundary but does involve public review, agency coordination, protection of CSP's legal rights, and community involvement.

**#15-127** Reasonable accommodation refers to the need of CSP to be responsive to those with physical disability or accessibility issues. Sustainable green design refers to the design of facilities to be more compatible with the environment in general. Specifically, green design may incorporate the use of recycled materials, design for improved energy efficiency, and replace materials or products with known pollutant effects, with non polluting products, if available.

**#15-128** CSP respectfully disagrees. CSP is the primary law enforcement, search and rescue and maintenance response agency for ABDSP. This responsibility for public safety and maintenance is a 24-hour/day operation. At State Park units throughout California, CSP has for many years effectively provided 24-hour public safety and maintenance response by providing park employee housing close to or within park facilities. This has allowed CSP to provide appropriate and effective response to after hours incidents such as medical aids, crimes in progress, and urgent maintenance needs without having to fund employee salaries and travel time for after hour shifts. Ranger/staff in-residence programs are also utilized by the National Park Service, the U.S. Forest Service, and local regional parks for similar reasons.

**#15-129** This issue is addressed in Response # 15-68. CSP has taken two State Senators on tours of the Carrizo Impact Area in 2003-2004 and plans to take a U.S. Congressman on tour in 2004-2005 for the specific purpose of gaining legal support to acquire funding to clean up the Carrizo Impact Area. The park has never "resisted" or refused Federal funding for clean-up.

15-122  
(cont'd) | the US Forest Service and CDF in dealing with recent wildland fires. They have refused to sign a written agreement to work with Backcountry Horsemen of California and they have exhibited substandard levels of communication and partnership with several other recognized recreation based organizations.

**Page 3-45**

15-123 | Guideline-Community 3a states, “encourage and develop volunteer groups and work programs that are consistent with park needs and values”. What criteria will be used to define consistency? How many of the “Values” used have come from public comment?

15-124 | We strongly suggest that Park Managers seek guidance of other agencies, such as, the US Forest Service and BLM to develop programs such as Adopt-a-Trail and Adopt-a-Cabin. The Park has roads, trails and structures that would benefit from such programs.

**Page 3-46**

15-125 | We have great concern with Guideline-Community 6a: Guideline Com-4: “create a grant writing program with the assistance of local environmental and non-profit groups.” there must be careful and thorough oversight of this process with an advisory committee made up of stakeholders with many diverse viewpoints.

**Page 3-47**

15-126 | Guideline-Property 2a expresses the need to contain or minimize perceived negative effects from land use on properties adjacent to Park boundaries. This seriously over reaches the Park Mission. Park staff has no authorization to dictate to actions on lands outside the Park boundaries.

**Page 3-48**

15-127 | We are not opposed to the guidelines presented on this page; however, we again seek clarification of terms and phrases such as “reasonable accommodation”, “sustainable green design” Please provide definitions of these phrases.

**Page 3-49**

15-128 | We strongly object to any staff housing being maintained or developed within Park boundaries. This guideline is in direct conflict with the Park Mission, Declaration of Purpose, and Vision. It is completely unacceptable to use Park lands in this way.

**Page 3-51**

15-129 | Section 3.3.2.2 Carrizo Impact Area states: “The Carrizo Impact Area is located in the Southeasterly portion of the Park between Fish Creek and the Coyote Mountains. This area includes approximately 27,000 acres in the Carrizo Badlands and was used between 1942-1959 as an aerial bombing range by the U.S. Army and Navy. Because of the potential danger of uncovering unexploded ordnances, the public is denied access to one of the Park’s most scenic areas.” Members of the public have discovered that the Department of Defense is willing to entertain a Memorandum of Understanding to clean up this area or at least a corridor that would include the historic Mormon Battalion Trail. We strongly encourage Park Management to pursue this opportunity to open this area to

**#15-130** As addressed previously, the Wilderness Designation was not changed to allow construction of the Lower Willows Bypass Road. This was clarified in numerous letters to Senator Morrow in 2004. There is no evidence to support the point that bighorn sheep would utilize the area more frequently because a road thru the creek kept the vegetation down. Bighorn management actions are consistent with the USFWS Recovery Plan for this species.

**#15-131** CSP respectfully disagrees that the Coyote Canyon Public Use Plan and the Ecological Conditions reports are "fatally flawed". CSP stands by the decision that closed Coyote Canyon to motorized vehicles.

**#15-132** CSP respectfully disagrees that there is an inadequate level of assessment for the program level document or that there is inadequate mitigation proposed. The specific projects proposed under the General Plan either as capital outlay projects or management plans will address specific mitigation measures and undergo subsequent CEQA compliance. Please also see Section P.1.2.

Comment Letter 15 – Multiple Organizations

15-129  
(cont'd)

the public and restore access to the Mormon Battalion Trail, the Butterfield Stage Route and the Jackass Mail Trail.

15-130

**Page 3-53** Paragraph 2 First sentence reads; “Dudek and Associates (1999) assessed the potential to develop alternative routes for the 3.1 mile road closure and found significant obstacles to the potential road realignment. Factors influencing the infeasibility of the routes included high cost, conflict with State Wilderness designation and required consultation with the U.S. Fish and Wildlife Service regarding the effect to endangered Peninsular Bighorn Sheep.” We, strongly object to the use of this assessment. It is fatally flawed. Cost to protect a contiguous historic travel route must be considered a non-issue. Any conflict with State Wilderness designations can be addressed by petitioning the Park and Recreation Commission to amend the State Wilderness boundaries as was done in 1986 in resolution 8-86 concerning the Lower Willows realignment. Additionally, it is possible to cherry stem existing route/road alignments in Wilderness. We submit that since Bighorn Sheep are prey animals that prefer open areas with low growing vegetation, the abundant growth of riparian vegetation in the Canyon post road closure is likely to have serious impact on the Bighorn Sheep’s willingness to drink at the creek if they must go into or through dense vegetation to get to water.

15-131

**Page 3-54**

Guideline-CC 1c: states “Continue to manage Coyote Canyon as outlined in the Coyote Canyon Public Use Plan (1995) and as assessed in the Ecological Conditions in Coyote Canyon, Anza Borrego Desert State Park, and an Assessment of the Coyote Canyon Public Use Plan (2002).” We strongly object to the use of these documents to direct future management of this area. Both documents are fatally flawed. According the Legislative Opinion issued April 20, 2004 the Department of Parks and Recreation does not have the authority to close the 3.1 mile section of the Coyote Canyon Road. The Ecological Assessment Report of 2002 drew conclusions without setting critical baselines and excluded important input or key surveys from key recreational interests, such as, the four-wheel drive and equestrian communities as presented to Director Ruth Coleman on June 9, 2004 by Attorney David Hubbard.

15-132

**Page 3-58**

3.4 Future Planning Efforts; states, “There is a number of planning efforts that require detailed attention too specific for the overall planning efforts of this General Plan.” The whole point of preparing an Environmental Impact Report is to provide a detailed report of the projected impacts of site-specific planning actions; therefore, this General Plan/DEIR does not meet the minimum requirements for CEQA compliance. It cannot be approved as currently written. Each proposed future management planning effort must be identified and analyzed. They must be presented with a range of alternatives for consideration as part of the public planning process. We refuse to accept this General Plan/DEIR. The level of analysis contained in the Environmental Analysis is woefully incomplete for a Park of this size; therefore, we cannot support in any way this Preliminary General Plan/ Draft Environmental Impact Report.

Thank you for the opportunity to review and comment on this document. We look forward to continuing to be a part of this very important process.

CC: A. Schwarzenegger,  
M. Chrisman  
R. Coleman,  
B. Morrow,  
D. Hollingsworth,  
J. LaSuer  
J. Benoit,  
J. Vargas,  
R Haynes