



January 18, 2017

California Department of Parks and Recreation Attention:
Lisa Mangat, Director
P.O. Box 942896 Sacramento,
CA 94296

Submitted via Email: trails@parks.ca.gov

RE: Off-Trail Use Restrictions for Preserves and Reserves Proposed Rulemaking

The Access Fund, American Alpine Club (AAC) and Bay Area Climbers Coalition (BACC), appreciate this opportunity to comment on the California Department of Parks and Recreation (DPR) proposed amendment to replace repealed CCR Section 4325, Title 14, Chapter 1, regarding off-trail use restrictions for State Preserves and Reserves. California State Parks offer a wide range of recreational opportunities for multiple user groups including significant rock climbing resources throughout the state. The revised proposed regulation prohibiting all public use unless such use is on a trail or boardwalk travel would impact access to rock climbing opportunities that exist in the State Parks Natural and Cultural Preserves and Cultural Reserves. We would like to continue to work with the California DPR to ensure access is permitted to rock climbing areas within state preserves and reserves.

The Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing advocacy organization with over 15,000 members and over 100 local affiliates. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit www.accessfund.org.

American Alpine Club

The American Alpine Club is a 501(c)(3) charitable organization whose vision is a united community of competent climbers and healthy climbing landscapes. Together with our members, the AAC

advocates for American climbers domestically and around the world and provides grants and volunteer opportunities to protect and conserve the places we climb.

Bay Area Climbers Coalition

The Bay Area Climbers Coalition is a volunteer run 501(c)(3) non-profit organization focused on preserving access to our local outdoor areas by actively fostering positive relationships with land managers, hosting stewardship events, and providing educational programming for the climbing community throughout the Bay Area.

COMMENTS

The proposed regulation to prohibit all public use in Natural Preserves, Cultural Preserves, and State Cultural Reserves unless on a trail or boardwalk could limit or prohibit access to established rock climbing and other recreational activities. We support the protection of sensitive natural and cultural resources; however, we recommend a more balanced management approach that can accommodate sustainable recreation opportunities alongside resource protection. While we advocate for the climbing community specifically, we generally support most forms of responsible human-powered recreation, and this proposed regulation could significantly impact access to appropriate recreation in State Park reserves and preserves. We acknowledge the modifications made in the revised proposed amendment, which appear to be more inclusive of off-trail use in certain areas. The climbing community would like to continue to work with California State Parks to establish sustainable access trails to climbing areas within State Park reserves and preserves.

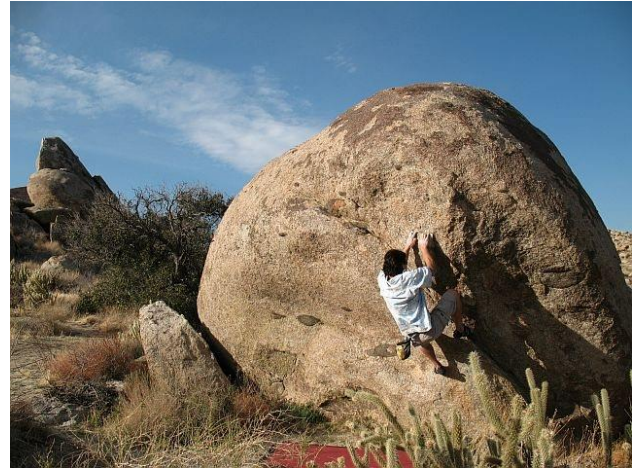
Rock Climbing in California State Parks

There are numerous established rock climbing destinations within the California State Parks system. Rock climbing is recognized by California State Parks as a viable form of recreation within California State Parks¹; however, rock climbing access trails are often not recognized or designated. We have identified two important, established rock climbing areas that exist within a Cultural Preserve: Culp Valley and Piedras Grandes in Anza Borrego Desert State Park and Cultural Reserve. These areas are highly-valued by the local climbing community and could be subject to the proposed prohibitions in the proposed amendment to replace repealed CCR Section 4325, Title 14, Chapter 1 Section 4325 Off Trail Restrictions - Preserves and Reserves.

¹ California State Parks Departmental Notice No. 93-25. Subject: Rock Climbing, Chapter: 1600, Natural and Cultural Resources. September 9, 1993.

Culp Valley and Piedras Grandes-Anza Borrego Desert State Park and Cultural Preserve

Culp Valley and Piedras Grandes offer high quality granite bouldering in San Diego County. These rock climbing areas are well known and published in a rock climbing guide book.² Both of these areas are currently managed under the 2012 Anza-Borrego Desert State Park Cultural Preserve Management Plan.³ Rock climbing is recognized as an appropriate form of recreation in the Preserve.



Bouldering in Culp Valley. Photo Credit: Chris Miller

*'Rock climbing is popular here in the form of bouldering, which does not require permanent equipment mounted to the rock face. Bouldering activity has not shown evidence of impact to the cultural resources and appears to be an appropriate form of recreation within this cultural preserve zone, and will be monitored to regularly assess conditions.'*⁴

Depending on how the proposed off-trail use regulation is implemented, it could contradict the specific guidelines outlined in the 2012 Anza-Borrego Desert State Park Cultural Preserve Management Plan.⁵

Recommendations

Access Fund, AAC and BACC recommend that the DPR continue to manage climbing in Culp Valley and Piedras Grandes as outlined in the 2012 Anza-Borrego Desert State Park Cultural Preserve Management Plan. While rock climbing is an acknowledged and approved form of recreation within Anza-Borrego Desert State Park Cultural Preserve, many of the access trails to the boulders are not officially designated.

² Kennedy, Dave. 2006. San Diego County Climbing Guide.

³ Anza-Borrego Desert State Park Cultural Preserve Management Plan, November 2012. Accessed: http://www.parks.ca.gov/pages/21299/files/final_abdsp_cultural_preserve_management_plan_112612.pdf ⁵ Anza-Borrego Desert State Park Cultural Preserve Management Plan, November 2012. Page 36.

⁴ Anza-Borrego Desert State Park Cultural Preserve Management Plan, November 2012. Page 36.

⁵ Anza-Borrego Desert State Park Cultural Preserve Management Plan, November 2012. Accessed: http://www.parks.ca.gov/pages/21299/files/final_abdsp_cultural_preserve_management_plan_112612.pdf

We acknowledge and appreciate that the proposed amendment makes exceptions to the rule in Section b of the proposed amendment:

(b) Notwithstanding (a), the entirety or portions of Natural Preserves, Cultural Preserves, State Cultural Reserves, or State Natural Reserves may be open to off-trail access:

- (1) on routes of travel that have been shown in a general plan or management plan or adopted in a similar process;*
- (2) in an area that has been designated open for off-trail use by the park unit's general plan or a specific management plan;*
- (3) or, on a route of travel or in an area that the District Superintendent designates open for off-trail use by posted order after determining that off-trail use is important for public access and where it has been determined that impacts to the resources for which the park unit was established will not be significant.⁶*

We propose that, instead of establishing a blanket, statewide prohibition on all use in all areas, the regulation allow District Superintendents time to conduct any necessary studies, receive appropriate reports, and consult with stakeholders before issuing the order proposed in paragraph (b)(3) above. We therefore propose that the following sentence be added at the end of paragraph(b)(3): "District Superintendents may allow continued public access to an existing route of travel or an existing area of use for such time as is necessary to conduct any necessary and appropriate studies, reports and analyses and to consult with all stakeholders prior to issuing such an order." We believe this process will enhance public confidence in the Department's management of reserves and preserves while ensuring adequate protection of cultural and natural resources.

We strongly support initiatives which allow responsible recreation to co-exist sustainably with natural and cultural resource preservation. By designing sustainable trails to access rock climbing areas, resources can be protected while allowing the continued and recognized activity of rock climbing in State Park reserves and preserves. We encourage the DPR and District Superintendents to conduct an assessment of recreation use patterns in order to protect natural and cultural resources while allowing responsible recreational activities (such as climbing) to continue. Finally, we believe a reserve/preserve-specific economic assessment should be conducted prior to any recreational closure to fully understand the implications of the proposed regulation on recreational user groups, the staff and budget of the particular preserve or reserves, and surrounding communities.

Access Fund Assistance

The climbing community and the Access Fund are ready, willing, and able to help the DPR improve trails or other management needs. Local climbing communities throughout California have a long

⁶ Proposed Amendment to replace repealed CCR Section 4325, Title 14, Chapter 1 Section 4325 Off Trail Restrictions - Preserves and Reserves, December, 2016.

history of positive environmental stewardship and collaboration with government agencies at all levels of government, private land owners and other organizations to protect this wonderful, highly-valued resource. Access Fund strives to work with local climbers and land managers to address those needs. We also provide training on planning and stewardship best practices to keep those areas healthy. In addition, some aspects of this planning initiative may qualify for the Access Fund Climbing Preservation Grant Program⁷ or assistance from our Conservation Team⁸ which helps maintain climbing areas throughout the United States.

* * *

Thank you for your consideration of these comments on the off-trail use restrictions for preserves and reserves proposed rulemaking. The Access Fund has the experience, local contacts, and resources to help planners craft alternatives that encourage climbing while sustaining the health and integrity of the State Parks preserves and reserves. The Access Fund looks forward to continuing to work with DPR. Please keep us informed as the planning process proceeds. Finally, we truly appreciate the efforts of the staff to seek input from diverse groups and interests and appreciate the public hearings held on this issue in 2016. Feel free to contact me via telephone (303-552-2843) or email (katie@accessfund.org) to discuss this matter further.

Best Regards,



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The Access Fund



Matt Ulery
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Cc: Brady Robinson, Access Fund, Executive Director
Erik Murdock, Access Fund, Policy Director
Tom Addison, Access Fund, California Regional Coordinator

⁷ See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm.

⁸ See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.