



Protect America's Climbing



June 6, 2016

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

Submitted via Email: [trails@parks.ca.gov](mailto: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 rulemaking on 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 across the state. The proposed regulation prohibiting all public use unless such use is on a trail, boardwalk or designated route of travel would significantly impact access to rock climbing opportunities that exist in the State Parks Natural and Cultural Preserves and Cultural 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 13,000 members and 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](http://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.

### **The 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, boardwalk or other designated route would limit or prohibit access to established rock climbing areas in State Park Preserves and Reserves. We support the protection of sensitive biological and cultural resources; however, we recommend a more balanced 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 recreation, and this proposed regulation would significantly impact access to appropriate recreation in State Park Reserves and Preserves. In addition, the proposed regulation states that minimal costs would be incurred by DPR to post signs<sup>1</sup>.

### **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 Parks<sup>2</sup>; 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 would be subject to the proposed prohibitions.

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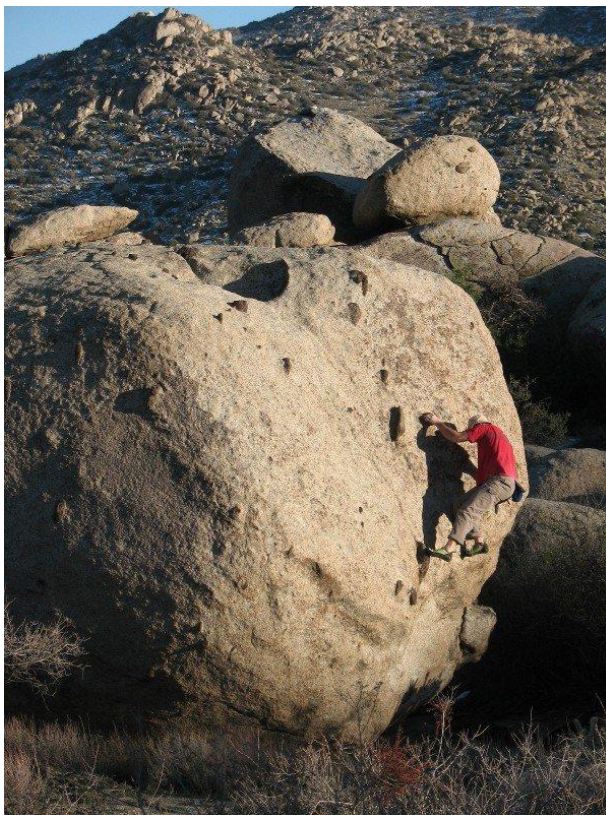
<sup>1</sup> Title 14. California Department of Parks and Recreation, April 22, 2016. Off-Trail Use Restrictions for Preserves and Reserves, Notice of Proposed Rulemaking.

<sup>2</sup> 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<sup>3</sup>. Both of these areas are currently managed under the 2012 Anza-Borrego Desert State Park Cultural Preserve Management Plan<sup>4</sup>. Rock climbing is recognized as an appropriate form of recreation in the Preserve.

*'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.'*<sup>5</sup>



Bouldering in Culp Valley. Photo Credit: Chris Miller

The implementation of the proposed off-trail use regulation would undermine the specific guidelines outlined in the 2012 Anza-Borrego Desert State Park Cultural Preserve Management Plan<sup>6</sup>.

### Recommendations

Access Fund, AAC and BACC recommend that the DPR continue to successfully manage this area 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 designated. The DPR should establish designated paths in areas that receive frequent, low-impact recreational use rather than prohibiting all use in the area. By designing sustainable, designated trails to access rock climbing areas, resources can be protected while allowing the continued and recognized activity of rock climbing in State Parks. The DPR should continue to allow each park unit to operate under their current management plan and individually assess user trails and recreational impacts on a case by case basis, instead of establishing a blanket, statewide

<sup>3</sup> Kennedy, Dave. 2006. San Diego County Climbing Guide.

<sup>4</sup> 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](http://www.parks.ca.gov/pages/21299/files/final_abdsp_cultural_preserve_management_plan_112612.pdf)

<sup>5</sup> Anza-Borrego Desert State Park Cultural Preserve Management Plan, November 2012. Page 36.

<sup>6</sup> 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](http://www.parks.ca.gov/pages/21299/files/final_abdsp_cultural_preserve_management_plan_112612.pdf)

regulation. We encourage the DPR to complete an inventory of Preserves and Reserves and current use patterns to protect the resources while allowing responsible recreational activities (such as climbing) to continue. We request a public hearing be held to further identify user groups and recreational use patterns prior to implementing this proposed regulation. Finally an economic assessment should be conducted to fully understand the implications of the proposed regulation on user groups as well as the staff and budget of the Preserves and Reserves.

**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 history of positive environmental stewardship and collaboration with 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 Program<sup>7</sup> or assistance from our Conservation Team<sup>8</sup> which helps maintain climbing areas throughout the United States.

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<sup>7</sup> See [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants\\_program.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm).

<sup>8</sup> See [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation\\_Team.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm).

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 participating throughout the planning process. 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 in response to the proposed regulation and request a public meeting be held prior to final decision making. 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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Matt Ulery  
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Cc: Brady Robinson, Access Fund, Executive Director  
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