



Protect America's Climbing

March 24, 2016

California Coastal Commission
Attention: Nancy Cave
45 Fremont Street #2000
San Francisco, CA 94105

Submitted via email: SonomaStateParksAppeal@Coastal.CA.gov

RE: Sonoma Coast State Parks Fee Proposal

The Access Fund appreciates this opportunity to comment on the Sonoma Coast State Parks Fee Proposal. We greatly appreciate the proposed changes to the Fee Proposal which we understand remove the proposed kiosk location at Goat Rock Beach. That kiosk location would have eliminated roadside parking areas essential for climber's access to Sunset Rock. Sunset Rock is a significant climbing resource for San Francisco Bay area climbers. The Sonoma Coast State Parks offer a wide range of recreational opportunities for multiple user groups. While positive changes have been made to the Fee Proposal that directly benefit climbers, we continue to believe that imposing fees is inappropriate, both for other user groups as well as climbers.

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.

COMMENTS

The Fee Proposal has been continually evolving making public comments to the California Coastal Commission (CCC) difficult. The latest Fee Proposal was released on March 15, 2016¹. The Fee Proposal includes changes to the original Fee Proposal based on public comments. We are pleased access and parking for Sunset Rocks will not be blocked by a fee kiosk. However the

¹ California Coastal Commission De Novo Application Background and Project Description, Day Use Fee Collection Device Proposal, March 2016

current Fee Proposal includes limited and fragmented public scoping, and does not align with Coastal Act Policies. Moreover the implementation of this Fee Proposal would set an inappropriate precedence for user fees for California State Parks.

Rock Climbing at Goat Beach-Sunset Rocks

We are delighted that the proposed development of the three lane manned kiosk on Goat Rock Beach Road (Figure 1) was removed from the Fee Proposal in response to public comments.²

The previous proposal would have eliminated all essential parking and limit current trail access to Sunset Rocks, which is a significant and historic climbing resource for the San Francisco Bay area rock climbers. Sunset Rocks offer a short approach to a variety of top-rope routes and boulder problems ranging from V0-V10 making this a great climbing destination for beginners and expert climbers alike.



Photo: Sunset Rocks, Credit: Jerry Dodrill.

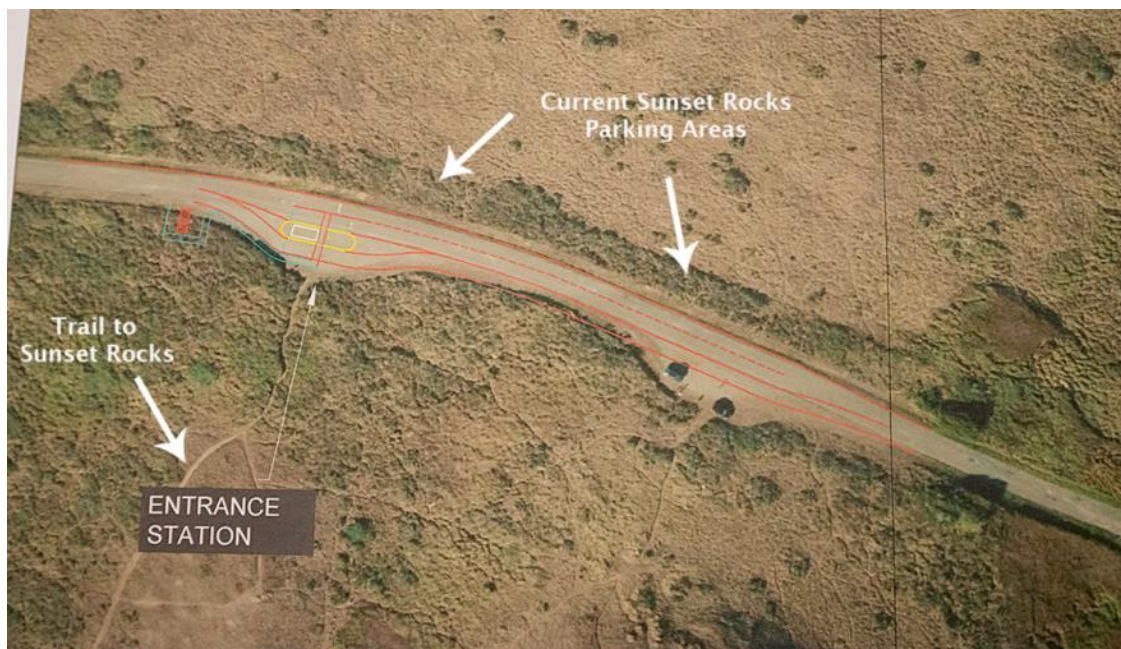


Figure 1. Overview of previously-proposed kiosk at Goat Rock Road, Sunset Rocks parking and access³

² Day Use Parking Fee Collection Proposal, Sonoma Coast SP and Salt Point SP, California State Parks. March 2016. Section 2.8 Public Comments and State Parks Responses.

³ Sonoma Coast State Parks Fee Proposal, Entrance Station Concept Goat Rock Road, February 17, 2016. Labels

Recommendations

The Fee Proposal was developed with limited and fragmented public scoping and does not align with Coastal Act Policies. We recommend additional user groups including the climbing community continue to be involved in the Fee Proposal planning in an organized manner. The introduction of fees to the selected coastal areas is contrary to the California Coastal Commissions mandate to maximize access to the public and will disproportionately affect economically disadvantaged users throughout the Sonoma Coast State Parks. *'The location and amount of new development should maintain and enhance public access to the coast'*.⁴ In addition *'Lower cost visitor and recreational facilities and housing opportunities for persons and families of low or moderate income, as defined by Section 50093 of the Health and Safety Code, shall be protected, encouraged, and, where feasible, provided..'*⁵

The State Park's appeal to the California Coastal Commission is viewed by the community as an attempt to take jurisdiction away from the Sonoma County government who unanimously denied this Fee Proposal's coastal development permit. Allowing this Fee Proposal to go into effect would set an inappropriate precedent for new user fees at State Parks throughout all of California. We recommend that this Fee Proposal not be approved in its current form, adequate time should be given to the public to respond to the latest Fee Proposal, and additional public scoping should be conducted to include input from recreational users and the general public.

Access Fund Assistance

The climbing community and the Access Fund are ready, willing, and able to help the State Park improve trails or other management needs. The local climbing community has a long history of positive environmental stewardship, and collaboration with other organizations to protect this wonderful portion of the coast. At the Access Fund we strive to work with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

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denoting current trail and parking added.

⁴ Sonoma County Local Coastal Plan, Section VII. Development, Coastal Act Policies 30252

⁵ Sonoma County Local Coastal Plan, Section VII. Development, Coastal Act Policies 30213

Thank you for your consideration of these comments on the Sonoma Coast State Parks Fee Proposal. The Access Fund has the experience, local contacts, and resources to help planners craft alternatives that encourage climbing while sustaining the health, diversity and productivity of the State Parks. 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 Coastal Commission staff to seek input from diverse groups and interests in response to the State Parks proposal. Feel free to contact me via telephone (303-552-2843) or email (katie@accessfund.org) to discuss this matter further.

Best Regards,

A handwritten signature in black ink, appearing to read "Katie Goodwin". The signature is fluid and cursive, with the first name "Katie" being more prominent than the last name "Goodwin".

Katie Goodwin
Public Lands Associate
The Access Fund

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