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**Red Rock Canyon State Park (RRCSP) General Plan Revised Plan Concept Concerns**

**We are pleased to see California State Park's effort to create a plan to protect the unique resources of one of California's jewels.**

**The Draft Declaration of Purpose of Red Rock Canyon State Park states, "Visitor uses shall allow for and encourage enjoyment of the prime resource values of the unit without degrading these features".** Sadly, we see the off-road vehicle community does not appreciate that the Red Rock Canyon State Park General Plan Revised Plan Concept would degrade non-motorized public enjoyment and resource protection of the park. <https://youtu.be/HoWtORcyDo>

For the reasons stated in the paragraphs below, we consider segments of the RRCSP Revised Plan Concept to be inappropriate and in violation of the Purpose of Red Rock Canyon State Park and the Public Resource Code.

- 1) The Revised Plan Concept has proposed to downgrade and reclassify to a State Recreation Area** a section of the park along the northern boundary and east of State Highway 14, to allow legal "green-sticker vehicle motorized recreation access" where there is an extant population of the CESA threatened Mojave Ground Squirrel (MGS) *Xerospermophilus mohavensis*<sup>1</sup>. It is also the territory of the threatened Agassizi's desert tortoise. The eastern Sierra Nevada and western Mojave Desert is home to hundreds of thousands of acres of routed and open OHV areas on federal lands and California State Parks. The 2014 purchase of 25,000-acres Onyx Ranch created a new SVRA with 20,000 of those acres within the MGS range, in order to comply with the squirrel conservation plan where no more encroachment into their habitat should occur<sup>2</sup>.

<sup>1</sup> <https://www.wildlife.ca.gov/Conservation/Mammals/Mohave-Ground-Squirrel>

<sup>2</sup> <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=171301&inline> pp 100

- 2) **The Last Chance Canyon area is home to breeding populations of LeConte's Thrasher (LETH)**, but only the San Joaquin Valley population is listed as a sensitive species, and due to proposed solar farms throughout the entire Kern portion of the Mojave Desert, the limited extant desert population of LETH should also be considered close to threatened<sup>3</sup> and protected as such. RRCSP saltbush scrub is becoming an isolated island of pristine desert habitat and should therefore be excluded from any activity that allows off-road access.
- 3) **The Park identifies only one Prairie Falcon territory for a seasonal closure**, but eBird data has recorded the falcon in the area of Old Dutch Cleanser mine and Ricardo during breeding season; these areas must be thoroughly surveyed for other nests.
- 4) **Migratory birds utilize the entire western Mojave Desert** and eastern Sierra Canyons as pathways during spring and fall migration. The sport of birding is consistently growing and an economic boon to low income segments of California. Motorized recreation is an anathema to the peaceful sport of birding and to successful breeding and migration survival. The state park's canyons, of particular interest to many birders, are eastern Kern's "migrant traps", or desert oases, several of which are within a few miles, near Red Rock Canyon State Park. With the loss of thousands of acres of pristine desert wildlife habitat to solar and wind farms, Red Rock Canyon State Park will be one of the few truly protected areas left in the region. The proposed green-sticker OHV access along the desert wash described as the northern section of Abbott Drive is antithetical to protection of wildlife, especially with hundreds of thousands of adjacent acres already dedicated to OHV use. Existing OHV recreation areas under all jurisdictions are so large they are inadequately managed to prevent habitat degradation, and adjacent non-OHV areas have been impacted by illegal OHV intrusions. While additional OHV areas in Red Rock Canyon State Park may be desired by the noisy OHV community, such an expansion is unacceptable to quiet recreationist Californians.
- 5) **The Red Rock Canyon State Park General Plan Revised Plan Concept does not provide sufficient enforcement with dedicated funding** allocated over the life of the management plan to protect the resources of the RRCSP. We recommend that RRCSP have controlled entry points where an entry fee is required, since entry fees lead to less damage by the visiting public. And also an entry fee would fund better park enforcement and allow the policing of resources in a more consistent and fair manner. Imposing a fine on those who defy the rules could also help minimize the negative impacts that excess people have on these natural areas.  
[http://scholarsarchive.jwu.edu/cgi/viewcontent.cgi?article=1006&context=student\\_scholarship](http://scholarsarchive.jwu.edu/cgi/viewcontent.cgi?article=1006&context=student_scholarship)
- 6) **The Red Rock Canyon State Park General Plan Revised Plan Concept fails to provide the purpose for increasing recreation throughout the park instead of concentrating usage to a smaller footprint to preserve resources**, protect dark skies, protect the flora and fauna, and preserve the experience of solitude that draws many to the desert. A smaller vehicle footprint will allow the visitor to fully experience the biodiversity, geology, and archeological history of the park without causing those resources to suffer. Expanding kiosks

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<sup>3</sup> <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=10423&inline>

and educational programs at trailheads would increase visitation without resource degradation.

- 7) **We propose further extensive archeological, biological, and geological surveys**, so that more sensitive areas are understood and given near wilderness status. With two disparate indigenous groups occupying the Red Rock Canyon area over the past 3,000 years and extinct ancient groups up to 12,000 years before present, the cultural resources of the park must be of paramount importance to protect in perpetuity.
- 8) **The Red Rock Canyon State Park General Plan Revised Plan Concept with officially sanctioned memorialized OHV use would violate the spirit *and* the letter of the California Code, Public Resources Code - PRC § 5019.53.**

The Revised Plan Concept would degrade, not “preserve, protect, and maintain natural values,” or “maintain its native environmental complexes” “in a manner consistent with the preservation of natural, scenic, cultural, and ecological values for present and future generations.” “Improvements that do not directly enhance the public's enjoyment . . . shall not be undertaken within state parks.”

**California Code, Public Resources Code - PRC § 5019.53.** <https://codes.findlaw.com/ca/public-resources-code/prc-sect-5019-53.html>

State parks consist of relatively spacious areas of outstanding scenic or natural character, oftentimes also containing significant historical, archaeological, ecological, geological, or other similar values. The purpose of state parks shall be to preserve outstanding natural, scenic, and cultural values, indigenous aquatic and terrestrial fauna and flora, and the most significant examples of ecological regions of California, such as the Sierra Nevada, northeast volcanic, great valley, coastal strip, Klamath-Siskiyou Mountains, southwest mountains and valleys, redwoods, foothills and low coastal mountains, and desert and desert mountains.

Each state park shall be managed as a composite whole in order to restore, protect, and maintain its native environmental complexes to the extent compatible with the primary purpose for which the park was established.

Improvements undertaken within state parks shall be for the purpose of making the areas available for public enjoyment and education in a manner consistent with the preservation of natural, scenic, cultural, and ecological values for present and future generations. Improvements 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 those improvements involve no major modification of lands, forests, or waters. Improvements that do not directly enhance the public's enjoyment of the natural, scenic, cultural, or ecological values of the resource, which are attractions in themselves, or which are otherwise available to the public within a reasonable distance outside the park, shall not be undertaken within state parks.

9) Red Rock Canyon State Park and Kern County in general are situated in the highly endemic area of the fungal pathogen *Coccidioides immitis*, the causative agent of coccidioidomycosis also known as valley fever. Spores of this soil borne pathogen can easily become airborne when soil is disturbed, because it lives in the topsoil horizon, and when inhaled can cause pulmonary disease in about 40% of the infected (Pappagianis 1980. There is no cure against coccidioidomycosis, a vaccine will not be available in the near future and treating the infection is costly (\$ 50,000 on average when hospitalized). **The total lifetime cost burden of coccidioidomycosis cases reported in 2017 in California is just under \$700 million US dollars**, with \$429 million in direct costs and \$271 million in indirect costs. Valley fever cases in Kern County last year were highest since 1992, a 27-year record, building on a four-year increase with nearly 3,000 reported cases in 2018 and 6 deaths in Kern County (Wilson et al. 2019; Meyer 2019). Many patients have to take antifungal medicine to inhibit the pathogen for months or lifelong. **Off-road vehicles are increasing PM10 pollution (soil particles smaller than 10 µm) and are putting themselves and others at risk of contracting the disease.** Airborne spores of *Coccidioides* are small enough (2-5 µm) to be transported by the wind to other locations. Due to climate change, scientists have predicted that the incidence of the disease will increase in the future with the pathogen expanding its habitat (Gorris et al. 2019). As a spore-former, it is benefitting from the drought conditions. *Coccidioides immitis* was recently detected in the community of Trona which was hit by a recent earthquake. It is therefore recommended by health care officials to avoid unnecessary soil disturbance in endemic areas of the pathogen to prevent coccidioidomycosis, thus reducing health care costs and human and animal suffering (California Department of Public Health, 2019).

## References

California Department of Public Health. Coccidioidomycosis (valley fever), 2019, available at: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/Coccidioidomycosis.aspx>

### [Detection of \*Coccidioides immitis\* in Kern County, California, by multiplex PCR](#)

[A Lauer](#), JDH Baal, JCH Baal, M Verma, JM Chen - Mycologia, 2012 - Taylor & Francis  
Coccidioides immitis is a fungal human pathogen endemic to semiarid soils in southern California and Baja California (Mexico). Results of culture-dependent detection of C. immitis in the past indicated a spotty distribution and unreliable prediction of C. immitis growth sites and accumulation sites. In this project we investigated bulk soil samples for the presence of the pathogen in nonagricultural loamy soils at nine different locations around Bakersfield, Kern County, California, for almost 2 y (2008–2009).

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Pappagianis D. Epidemiology of coccidioidomycosis. In Coccidioidomycosis 1980 (pp. 63-85). Springer, Boston, MA.

Wilson L, Ting J, Lin H, Shah R, MacLean M, Peterson MW, Stockamp N, Libke R, Brown P. The rise of valley fever: prevalence and cost burden of coccidioidomycosis infection in California. International journal of environmental research and public health. 2019 Jan;16(7):1113.

## **10) Proposed State Recreation Area**

Proposing to enable riders of Green Sticker Vehicles (non-street-legal off highway vehicles OHV's) in and through the Red Rock Canyon State Park (RRCSP) would invite wildfires, damage in critical habitat, and illegal trespass off the designated routes.

- a) Human activity caused 96 percent of 2018 California wildfires<sup>4</sup>.
- b) Illegal trespass by Green Sticker Vehicle riders has caused damage to the Pacific Crest Trail and the Piute Mountains of Sequoia National Forest.
- c) Agassizi's desert tortoises and Mojave ground squirrels could be injured or killed by OHV intrusions into the Proposed SRA, which contains habitat for these species.
- d) Green Sticker Vehicles and their riders are unidentified and un-trackable even if spotted by law enforcement or Park Rangers because they are not required to have a license and their riders wear protective face masks.
- e) The Revised Plan Concept fails to identify sufficient funding and enforcement over the life of the management plan to protect the resources of the RRCSP.

## **11) Proposed Opal Rock Primitive Camping**

Proposing to allow group camping within the RRCSP in the Proposed Opal Rock Primitive Camping area would invite wildfires, damage in critical habitat, and illegal trespass off the designated routes.

- a) Human activity caused 96 percent of 2018 wildfires in California.
- b) Illegal trespass by Green Sticker Vehicle riders has caused damage to the Pacific Crest Trail and the Piute Mountains of Sequoia National Forest.
- c) Desert tortoises and Mojave ground squirrels could be injured or killed by OHV intrusions into the Proposed SRA, which contains documented habitat for these species.
- d) Green Sticker Vehicles and their riders are unidentified and un-trackable even if spotted by law enforcement or Park Rangers because they are not required to have a license and their riders wear protective face masks.

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<sup>4</sup> [https://www.predictiveservices.nifc.gov/intelligence/2018\\_statsumm/fires\\_acres18.pdf](https://www.predictiveservices.nifc.gov/intelligence/2018_statsumm/fires_acres18.pdf) (California table)

- e) The Revised Plan Concept fails to identify sufficient funding and enforcement over the life of the management plan to protect the resources of the RRCSP.

## **12) Proposed Sierra View Primitive Camping**

Proposing to allow camping in the Limited Use Management Zone at the Proposed Sierra View Primitive Camping area would invite wildfires, damage in critical habitat, and illegal trespass off the designated route.

- a) Human activity in 2018 caused 96 percent of California wildfires.
- b) Illegal trespass by OHV riders has caused damage to the Pacific Crest Trail and the Piute Mountains of Sequoia National Forest.
- c) Desert tortoises and Mojave ground squirrels could be injured or killed by OHV trespass off the route in the Limited Use Management Zone.
- d) The Revised Plan Concept fails to identify sufficient funding and enforcement over the life of the management plan to protect the resources of the RRCSP.

## **13) Proposed Equestrian and Hiking Trailhead at Nightmare Gulch/ Scenic Canyon**

Proposing to allow staging for horse trailers in the Birds of Prey Natural Preserve will degrade the “Natural” qualities of the area where incidents of annoying filth flies will increase due to the indiscriminate, abundant, and odorous fecal and urine discharged in the horse staging area and along the horse trails.

- a) Equine stomach nematode worms (*Habronema* spp.) can be transmitted by filth flies.
- b) The bacteria that cause pigeon fever, *Corynebacterium pseudotuberculosis*, can be transmitted by house flies.
- c) Fecal and other pathogenic bacteria, such as *Escherichia coli* and *Salmonella*, acquired by flies can be transmitted to humans when the flies land on residents or household surfaces.
- d) Filth flies can transmit disease and pathogens to birds and humans. Filth flies are not only annoying, but there are risks greater than just nuisance problems associated with fly populations. <https://extension.psu.edu/filth-fly-control-on-horse-farms>

## **14) Potential Trail Connection to Pacific Crest Trail**

The proposed connection from the Park to the PCT would be a nice amenity for a non-motorized trail, but would challenge OHV riders to illegally violate non-motorized-only PCT access, since Park Rangers acknowledge OHV's have historically violated the hikers-only regulations on the Pacific Crest Trail in Sequoia National Forest. We are reticent to bless this proposed trail segment unless there is a continuous law enforcement presence that truly enforces the non-motorized access to this internationally treasured trail, the PCT.

- a) Illegal trespass by Green Sticker Vehicle riders has caused damage to the Pacific Crest Trail and the Piute Mountains of Sequoia National Forest.
- b) The Revised Plan Concept fails to identify sufficient funding and enforcement over the life of the management plan to prevent violations of this hiker-only access to the Pacific Crest Trail and to protect the resources of the RRCSP.

**People visit parks for a variety of reasons**, so the increase in noise and potential to damage surroundings [that may result from the proposed plan] can take away any sense of solitude someone might find in one of these parks (Shenandoah).

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In 2010 the total visits numbered approximately 281 million (National). These parks are a popular tourist destination for many Americans enjoying the outdoors while in quest of nature, but also have the pitfall from those expecting an amusement park-like experience. Since there are increasing numbers of tourists visiting natural areas every year, the impact tourism has on the environment in many natural areas is immense (Kreag 17). Over the past 50 years, sadly unregulated tourism has become a major cause of environmental damage when it should be a “force for enhancement and protection (Mason 70).” Whether it’s noise pollution from vehicles, or trampling vegetation; tourists are unintentionally harming the land.

State and National parks preserve fragile environments that require due diligence exercised in order to preserve their biodiversity and to allow similar experiences for future tourists (Kreag 17). Many agencies and land managers have efforts underway attempting to reduce and reverse catastrophic impacts. Regulating the number of tourists during certain times of year, offering shuttle services, limiting air tours, promoting the “take in, take out” policy, and educating the public about leave no trace ethics and fining those who disregard laws lessen tourist impacts. Without these actions future generations will not be able to enjoy these peaceful and biodiverse scenic areas.

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Visitor impacts, caused by things such as walking, hiking, backpacking, rock climbing, horseback riding, camping, vehicle use and biking, have great negative impacts on national parks as well. Vegetation is being trampled, soil is being compacted, and ecosystems are being destroyed because of the growing amounts of tourists coming into these areas (Butcher 493-496). Trampling is a universal problem (Newsome 84). Trampling is caused by tourists using the same trail over and over again without a resting period and can cause damage that can eventually lead to the loss of biodiversity. When tourists stray off park trails or make current trails wider, the damage can be even worse. When vegetation is trampled, stems can be bruised and broken, plant vigor and regeneration is reduced, cover ground is lost and there can be a change in species composition (Environmental). Trampling can eliminate tree seedlings, which results in the loss of trees in that area, while damage to roots reduced their capacity to capture nutrition. When the composition of vegetation is compromised, there is a loss of biomass and the species diversity is reduced. All of this combined results in a loss of biodiversity in the area (Newsome 85). Trampling also impacts the soil. When soil loses organic matter, there is a decrease in air and water permeability, run off is increased and erosion

is accelerated (Environmental).

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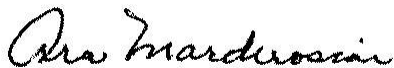
In addition, we recommend, that before any decision is implemented, Red Rock Canyon State Park allow Antje Lauer, [alauer@csub.edu](mailto:alauer@csub.edu) California State University Bakersfield, Department of Biology, to take samples of soils from RRCSP to investigate for the presence of the pathogen of *Coccidioides immitis*, also known as valley fever.

Thank you for your consideration of the above concerns and for the opportunity to comment.

Sincerely,



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