



SANTA CRUZ COUNTY GROUP
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To: CA State Parks
Re: Castle Rock Road and Trail Management Plan
January 22nd. 2020

The Sierra Club is aware that CA State Parks is in the process of evaluating a Change In Use (CIU) request for trails within Castle Rock State Park, specifically whether to open up a number of hiking only trails to mountain bike use.

In this context we are writing to ask the status of the 2003 Settlement Agreement between the Sierra Club and CA State Parks with respect to Castle Rock State Park: *Sierra Club et al. Department of Parks and Recreation, Sacramento Superior Court Case No. 00CS01235.*

This Settlement Agreement required CA State Parks Department to establish a Resource Advisory Committee of independent scientists to, among other things, provide the Department with input on the carrying capacity methodology being developed by the Department. The Agreement also required the Department to map the habitat of sensitive species including known marbled murrelet habitat; mountain lion habitat; knobcone pines; black oak woodland; ancient redwood forest; riparian areas and maritime chaparral.

The Sierra Club expects that the terms of the Settlement Agreement will be fulfilled as a prerequisite to any CIU process.

The Sierra Club recognizes the popularity of mountain biking in our State Parks open space lands and has developed positions that are reflected in the 2000 Castle Rock General Plan's statement under the heading, *Goal on page 74: Provide appropriate access and opportunities for the visiting public to enjoy the park while not degrading the natural features and ecological processes.* The 2010 Trails Plan: P1-9 states that: *In addition, acceptable impact levels must be established and monitored as required by*

the General Plan.

With respect to mountain biking, the Sierra Club has adopted positions that can be found at: <https://www.sierraclub.org/policy/road-use-bicycles>. They include the following:

“When a land management agency reviews suitability of a trail for bicycle use, bicycle use should not be allowed where it would cause the following measurable effects. This list is not all-inclusive.

1. Significant soil erosion or significant damage to streams or fish habitat.
2. Rutting, impairment of trail drainage, breakdown of trail shoulders, and other forms of damage not correctable using U.S. Forest Service trail maintenance standards and techniques.
3. Significant disturbance of plants or animals or their habitat.
4. Damage to archaeological, scientific, historical, or other significant resources, including rare natural features of interest for scientific study.
5. Danger to the safety of bicyclists or other users because of bicycle speed, steep grades, steep terrain, sharp curves, slippery or unstable trail surfaces, or limited visibility.
6. Significant displacement or annoyance of other non-motorized users.”

The terms of the Settlement Agreement have relevance for the assessment of the impact of opening up trails for mountain bike use, especially regarding carrying capacity and habitat mapping of specific plant and animal communities at Castle Rock State Park.

The Sierra Club requests a response regarding the status of the terms of the Settlement Agreement so that we can better assess and comment on the CIU.

Sincerely,

Gillian

Gillian Greensite, Chair
Sierra Club, Santa Cruz County Group