



SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

March 24, 2020

Mr. Chris Spohrer, District Superintendent  
California State Parks Department  
Santa Cruz District  
Via email to: Chris.Spohrer@parks.ca.gov

**RE: Change in use requests to open trails in Castle Rock Park to mountain bikes**

Dear Mr. Spohrer,

Although Castle Rock State Park (CRSP) lies primarily within the boundaries of the Sierra Club's Ventana Chapter there is significant usage by members of our adjoining Loma Prieta Chapter and we submit these supplementary comments in support of the commentary submitted thus far by the Ventana Chapter.

It has come to our attention that CRSP is in the process of considering change in use requests to open hiking trails in the Park to mountain bikes. It is particularly perplexing that the Park would consider permitting bikes on the iconic Skyline to the Sea Trail replete with narrow bridges and switchbacks. It is uniquely ill suited to be shared with mountain bikes and was not designed with that purpose in mind.

The Loma Prieta Chapter of the Sierra Club believes this entire proposal has little widespread support and as it becomes more widely known will face increasing public opposition.

Since the adoption of the *Castle Rock General Plan* in 2000 only one trail on the periphery of the Park in addition to park service roads have been lawfully accessible by mountain bikes. That is so because Castle Rock has been managed as de facto wilderness as clearly expressed in the *General Plan*:

“...This Declaration of Purpose for Castle Rock State Park reaffirms the Department's commitment for resource preservation and opportunities for compatible recreation. The potential increase in visitation and future recreation demands will be met with management actions that minimize visitor impacts, with the intent to maintain wildland values and low-impact recreational use. Castle Rock State Park will remain a wildlands park, providing opportunities for less intensive forms of recreation, solitude, and personal reflection....”<sup>1</sup>

In fact, while providing for specific forms of low-impact recreation, the *CRSP General Plan* describes the Park as a refuge for human beings in terms of “peace, tranquility, beauty, [an] experience far removed from the pressures of the modern world...”<sup>2</sup> Castle Rock is a place, in the words of Russell Varian whose estate donated land for the park to be established, where “... one must go unencumbered by the values of the world which he has fled, and find anew the values that are ages old.”<sup>3</sup>

In so acknowledging its value as public wildland, it should come as no surprise that a “Recreation Priority Alternative” to de facto wilderness management, which included mountain biking, was considered and rejected as the *General Plan* took shape.<sup>4</sup> Ultimately, acknowledging long standing Parks Department policy, the *General Plan* recognizes the district superintendent has the authority to open trails to mountain bikes but only if a list of 10 mitigating criteria are met.<sup>5</sup>

Those include environmental impact (to plants, animals and landscape); avoidance of user conflicts; Parks’ personnel staffing; Park visitor and adjoining community safety; emergency and law enforcement response capability; and evidence of obvious and undeniable public demand that mountain bikes be permitted. The relevance of these criteria to CRSP were further elucidated in the *Castle Rock State Park Draft Trails Plan*, released in 2010.<sup>6</sup>

Furthermore, it is our understanding that a Settlement Agreement between the Sierra Club and the California State Parks Department stipulated a number of similar provisions CRSP must honor before establishing any policies which would negate the Park’s management as a de facto wilderness.<sup>7</sup> Of course, such prohibitions would most certainly include the introduction of high-impact mountain biking at Castle Rock.

Given that concern, the Ventana Chapter of the Sierra Club, on Jan. 22, 2020, requested State Parks Department clarification of the status of that agreement but has yet to receive an adequate answer or even a polite acknowledgement to its urgent inquiry.<sup>8</sup> In response we share that urgency and accordingly will demonstrate herein that the State Parks Department has failed to comply with its own stated and agreed to mitigating criteria whose fulfillment is necessary as a condition of opening CRSP trails to mountain biking.

First and foremost, there is no obvious extensive public demand for mountain biking on CRSP trails. The most vocal proponents of mountain biking are organized biking groups bought and paid for by funding from bike retailers and manufacturers whose contributions are tax deductible. Flush with donated corporate money that REI characterizes as “investments,” local biker groups deploy paid staff they otherwise would not be able to afford which perpetually lobby public land managers to open trails to bikes.<sup>9</sup> No recreational interest other than the mountain bike lobby believes it has the right to appropriate public lands for its own objectives. Such a pernicious notion we expect our public land managers to resist, not enthusiastically endorse.

As to what the general public believes about legitimate uses of CRSP, the most recent user survey conducted in 2010 and clearly indicated hiking was the preferred activity there.<sup>10</sup>

Though prudent public policy is based on a thorough and current understanding of public sentiment, CRSP has not conducted a Park user survey for the past 10 years but none the less appears intent on compromising the Park's values by the introduction of mountain biking in one of the last bike-free enclaves in the Santa Cruz Mountains. The obvious question — how can the Parks Department advocate opening trails to mountain bikes without taking the time to sample the opinion of current Park visitors?

The explanation is simple. Recent user surveys conducted by the San Mateo County Parks Department, the Santa Clara County Parks Department and the Midpeninsula Regional Open Space District (MROSD) of public lands nearby CRSP, have all clearly demonstrated that their users are satisfied with the number of trails currently open to mountain bikes and have not called for more.<sup>11</sup> Note the MROSD survey, at a total cost of \$172,000, which was conducted system-wide and included the questioning of multiple focus groups, was perhaps the most comprehensive user survey ever undertaken by local public land agencies.

Clearly, CRSP has conducted no such survey of its users and has accordingly failed to show any evidence that the general public wants more trails accessible to mountain biking in the Park. This is the case in large part because there are over 1,500 miles of trails currently open to bikes in the Bay Area according to the Mountain Bike Project. Also, according to the Outdoor Industry Association, there is no evidence of increased mountain bike popularity as sales have been flat since 2001.<sup>12</sup> While there is no growth in mountain biking there is growth in hiking and walking.<sup>13</sup> Accordingly, the majority of CRSP users are hikers and walkers. User surveys at San Mateo County Parks, Santa Clara County Parks and the MROSD clearly state hiking and walking are the most popular activities on our local public lands.<sup>14</sup>

Furthermore, the MROSD's user survey documented no mention of mountain bikes, except in negative terms as a result of conflicts with non-biking trail users. Those conflicts occur on many so-called multiple use trails because mountain bikes transform the character of a hiking trail by changing its scale from human to machine. Mountain bikes moving at the typical posted speed limit of 15 MPH, travel 5 times faster than a typical hiker who is walking at 3 MPH. A mountain bike going downhill at 30 MPH is traveling 10 times faster than a typical hiker. Regardless of posted speed limits, such speeds are "normal" with the average mountain bike speed calculated at 30.53 MPH.<sup>15</sup>

Most certainly, mountain bikes will endanger children and the elderly, accelerating a decrease in non-biking trail users especially families in general and low income minority families in particular.<sup>16</sup> Over time, hikers will be displaced as mountain bike access will advantage a minority of mountain bike users while disadvantaging a majority of hikers and walkers, compromising Castle Rock's environment in the process. Certainly, mountain bikes on CRSP trails will increase small animal fatalities and negatively impact larger animal feeding and breeding behavior as well as trail-side plant communities.<sup>17</sup>

In proposing to allow mountain bikes on Castle Rock trails the Parks Department fails in its number one obligation, to protect the environment entrusted to its care, which your own Department's state-wide user survey makes clear is the public's highest priority.<sup>18</sup> We

believe mountain biking would inalterably compromise the Park's value as wildland, negate 20 years of management as de facto wilderness and pander to a recreational minority at the expense of a majority of CRSP users and the broader public at large.

Consequently, we respectfully recommend that the State Parks Department deny mountain bike access to Castle Rock trails and reaffirm its management of the Park as one of the last inviolate wildlands in the region.

Sincerely,



Katja Irvin and Gladwyn D'Souza  
Conservation Committee Co-Chairs  
Sierra Club Loma Prieta Chapter

CC: Ms. Lisa Mangat, Director, California Department of Parks and Recreation

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<sup>1</sup>Castle Rock State Park General Plan, State Park & Recreation Commission, 2000, pages 51-52, [https://www.parks.ca.gov/?page\\_id=21313](https://www.parks.ca.gov/?page_id=21313)

<sup>2</sup>Castle Rock State Park General Plan, State Park & Recreation Commission, 2000, page 3, [https://www.parks.ca.gov/?page\\_id=21313](https://www.parks.ca.gov/?page_id=21313)

<sup>3</sup>Castle Rock State Park General Plan, State Park & Recreation Commission, 2000, page 2, [https://www.parks.ca.gov/?page\\_id=21313](https://www.parks.ca.gov/?page_id=21313)

<sup>4</sup>Castle Rock State Park General Plan, State Park & Recreation Commission, 2000, page 118, [https://www.parks.ca.gov/?page\\_id=21313](https://www.parks.ca.gov/?page_id=21313)

<sup>5</sup>Castle Rock State Park General Plan, State Park & Recreation Commission, 2000, Appendix F, page 143-144, [https://www.parks.ca.gov/?page\\_id=21313](https://www.parks.ca.gov/?page_id=21313)

<sup>6</sup>Castle Rock State Park Draft Trails Plan 2010, Castle Rock State Park Citizens Trails Committee 2000-2010, pages 72 and 76-77, <https://www.parks.ca.gov/pages/1324/files/CRSP%20Draft%20Trails%20Plan.pdf>

<sup>7</sup>Sierra Club et al. Department of Parks and Recreation, Sacramento Superior Court, Case No. 00CS01235, filed 09/05/2000, see *Castle Rock State Park General Plan*, State Park & Recreation Commission, 2000, Appendix I, Settlement Agreement, page 171.

<sup>8</sup>Letter to California State Parks Department regarding Castle Rock Road and Trail Management Plan from Gillian Greensite, Chair, Santa Cruz Group, Ventana Chapter, Sierra Club, Jan. 22, 2020.

<sup>9</sup>\$15,000 donation from REI to Mountain Bikers of Santa Cruz, <https://www.rei.com/assets/stewardship/2018/2018-rei-grants/live.pdf> and <http://mbosc.org/jobs/> and REI gives \$500,000 to biker groups nation-wide <https://www.rei.com/stewardship> and <https://www.rei.com/assets/stewardship/2018/2018-rei-grants/live.pdf>

<sup>10</sup>"2010 CRSP User Survey Results," CRSP, <https://www.parks.ca.gov/pages/1324/files/Survey%20Results%20tracking%20sheet%201-26-11.pdf>

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<sup>11</sup>San Mateo County Parks, page 34, <https://parks.smcgov.org/sites/parks.smcgov.org/files/press-release/files/Visitor-Study-Final-Report-072216.pdf>, *2018 Visitor Survey Findings*, Santa Clara County Parks, <https://www.sccgov.org/sites/parks/Whats-Happening/Documents/visitor-survey-2018.pdf>, and *Midpeninsula Regional Open Space District's 2017-2018 Preserve Use Survey Project*, [https://www.openspace.org/sites/default/files/20180509\\_PreserveUseSurveyPresentation\\_R-18-44.pdf](https://www.openspace.org/sites/default/files/20180509_PreserveUseSurveyPresentation_R-18-44.pdf)

<sup>12</sup>"Outdoor Recreation Participation," *Top Line Report 2017*, Outdoor Foundation, page 8. [https://outdoorindustry.org/wp-content/uploads/2017/04/2017-Topline-Report\\_FINAL.pdf](https://outdoorindustry.org/wp-content/uploads/2017/04/2017-Topline-Report_FINAL.pdf), and "Demographics of Mountain Biking" International Mountain Bicycling Association, <https://imbacanada.com/demographics-of-mountain-biking/>

<sup>13</sup>"Participation in Outdoor Activities," *2018 Outdoor Recreation Participation Report*, Pages 36-37, <https://outdoorindustry.org/resource/2018-outdoor-participation-report/>

<sup>14</sup>*Midpeninsula Regional Open Space District's 2017-2018 Preserve Use Survey Project*, [https://www.openspace.org/sites/default/files/20180509\\_PreserveUseSurveyPresentation\\_R-18-44.pdf](https://www.openspace.org/sites/default/files/20180509_PreserveUseSurveyPresentation_R-18-44.pdf) *2018 Visitor Survey Findings*, Santa Clara County Parks, <https://www.sccgov.org/sites/parks/Whats-Happening/Documents/visitor-survey-2018.pdf>; *Visitor Use/Non-Use Parks Study 2015-2016*, San Mateo County Parks, page 34, <https://parks.smcgov.org/sites/parks.smcgov.org/files/press-release/files/Visitor-Study-Final-Report-072216.pdf>; and

<sup>15</sup><https://www.mountainbikereport.com/mountain-bike-speed/>, Note, speeding bikes on trails was a recommended area of user concern in a survey of users conducted for the Midpeninsula Open Space District. "Recommended Areas of Focus," *Midpeninsula Regional Open Space District's 2017-2018 Preserve Use Survey Project*, [https://www.openspace.org/sites/default/files/20180509\\_PreserveUseSurveyPresentation\\_R-18-44.pdf](https://www.openspace.org/sites/default/files/20180509_PreserveUseSurveyPresentation_R-18-44.pdf) and from *Visitor Use/Non-Use Parks Study 2015-2016*, San Mateo County Parks," page 34, <https://parks.smcgov.org/sites/parks.smcgov.org/files/press-release/files/Visitor-Study-Final-Report-072216.pdf>

<sup>16</sup>A recent Midpeninsula user survey revealed minorities in the Bay Area perceive a visit to Midpen properties to be culturally challenging with perceived barriers to entry. "Recommended Areas of Focus," *Midpeninsula Regional Open Space District's 2017-2018 Preserve Use Survey Project*, [https://www.openspace.org/sites/default/files/20180509\\_PreserveUseSurveyPresentation\\_R-18-44.pdf](https://www.openspace.org/sites/default/files/20180509_PreserveUseSurveyPresentation_R-18-44.pdf)

<sup>17</sup>"Impacts of Mountain Biking," *The Wildlife News*, June 18, 2019, <http://www.thewildlifeneeds.com/2019/06/18/impacts-of-mountain-biking/> and "When Bikers and Bears Don't Mix," the *New York Times*, Oct. 9, 2019 <https://www.nytimes.com/2019/10/07/science/bears-biking-national-parks.html> and "Effects of Recreation on Animals Revealed as Widespread through a Global Systematic Review," 2016, *PLOS ONE*,

[https://www.researchgate.net/publication/311527071\\_Effects\\_of\\_Recreation\\_on\\_Animals\\_Revealed\\_as\\_Widespread\\_through\\_a\\_Global\\_Systematic\\_Review](https://www.researchgate.net/publication/311527071_Effects_of_Recreation_on_Animals_Revealed_as_Widespread_through_a_Global_Systematic_Review) and "The Impacts of Mountain Biking on Wildlife and People, A Review of the Literature," *Cultural Change*, Sustainable Energy Institute, July 3, 2004, [http://www.culturechange.org/mountain\\_biking\\_impacts.htm](http://www.culturechange.org/mountain_biking_impacts.htm)

<sup>18</sup>A 2014 survey of park users conducted by the California State Parks Department found that 60% of respondents believed environmental protection was the most important mission of the State Parks Department. *Survey on Public Opinions and Attitudes on Outdoor Recreation in California 2012, Complete Findings* issued in January, 2014, [https://www.parks.ca.gov/pages/1324/files/PublicOpinionsAttitudes2012\\_spoa.pdf](https://www.parks.ca.gov/pages/1324/files/PublicOpinionsAttitudes2012_spoa.pdf)