

Attention: Environmental Coordinator; Tina Robinson, CEQA Coordinator  
Southern Service Center  
California Department of Parks & Recreation  
8885 Rio San Diego, Suite 270  
San Diego, CA 92108

Re: Draft Environmental Impact Report (DEIR)  
Anza-Borrego Desert State Park

To whom it may concern:

I make the comments contained in this letter on behalf the following equestrian groups: Backcountry Horsemen of California, Antelope Valley Unit, where I am the Vice President of Public Lands; Equestrian Trails, Inc., of which I am a representative in this instance; and Antelope Valley Trails, Recreation, and Environmental Council, of which I am the Legislative Advisor. The membership of these groups, combined, total over 5,000 equestrians. All of these citizens of the State of California have an interest in preserving their historic right to ride on public lands, and preserving trails, trailheads, and campgrounds within Anza-Borrego Desert State Park.

I am not going to comment on any particular alternative; the alternatives (and indeed, the idea of the General Plan) are moot in the face of the closure of trails to equestrians, without the implementation of the required CEQA public process, or indeed, any public input whatsoever. Instead, I will comment on passages found throughout the DEIR which require, in my view, rebuttal.

The DEIR purports to seek to preserve the "natural, cultural, and scenic resources" of Anza-Borrego Desert State Park. I certainly agree that these resources should be protected, but disagree that the de facto elimination of an historic and cultural use, horseback riding, would be at odds towards that purpose. Indeed, if Anza-Borrego, to this date, contains so many outstanding natural features, as the DEIR catalogs at great length, and by virtue of its being named as an International Biosphere Reserve, then it is obvious that 500 years of equestrian use has not been detrimental to Anza-Borrego. If you disagree with the foregoing, then state the scientific basis upon which you claim recreational horseback riding on historic trails has been detrimental to any resource since no evidence to support removal of this recreational activity has been included in the DEIR.

Despite the fact that the DEIR states, at page P-4, that focused management plans for camping, roads and trails, among other things, will be prepared subsequent to the adoption of the DEIR, a "trail management plan" has been adopted, de facto, already, without the proper public review and to the extreme detriment of equestrians by their unprecedented virtual elimination on all of the historic trails (with the only exception being the parts of the Pacific Crest Trail and the California Riding & Hiking Trail that traverse Anza-Borrego and which trails have been mandated by state proclamation as "riding trails"). In fact, no other state park in California has eliminated equestrians from all trails.

Further, as the largest area of State Wilderness in California, and since the State's concept of wilderness was modeled after the federal government's definition of wilderness as defined by the landmark Wilderness Act of 1964 (which specifically protects equestrian recreation in wilderness areas), then the State's unjustified restriction of the historic use of horses and livestock in wilderness areas is manifestly unfair and arbitrary and appears to be set according to the tastes and preferences of the current anti-equestrian administrators. This form of recreation is not a "fashion" or a newfangled mode of transportation; horses are the very basis of our history, and particularly as it pertains to travels across wilderness and open areas. Please state the basis, scientific or otherwise, for the interpretation of State Wilderness that excludes equestrians.

Throughout the DEIR, the former activities of humans are described in detail, from mining to ranching to military uses, and yet now when none of these uses, which defined the character of Anza-Borrego in its recent history, are still existing, equestrians are only recently being perceived as a threat to the environment or ecology of the park. There appears to be an agenda to try to restore Anza-Borrego to some sort

of "pre-European" condition, although the stamp of human history will always remain, and should not be erased. Indeed, at page 2-72, the DEIR states, "In December 1941, the State Park Commission further expanded and dedicated the Anza Desert State Park to the memory of Colonel de Anza and all of the other pioneers and settlers." The DEIR details the many historic roads and trails that carried the traffic of our ancestors, from the recent past to over 5,000 years ago, and yet riding a horse along one of these trails, in the opinion of the current park managers, will somehow degrade that which was created by equestrians. Prove the logic, with scientific particularity, how equestrian traffic will degrade the historic trails, and specifically the de Anza Trail, the Mormon Battalion Trail, and the Jackass Mail Trail, as well as the California Riding & Hiking Trail, which has been closed in sections within Anza-Borrego.

At page 2-32, the DEIR states, "Many researchers have described soil disruption, plant trampling, and erosive effects of equestrian activity," and goes on to cite Widner and Marion 1993. In fact, this study describes that horses can cause disruptive activity if not managed properly, but in the full assessment, Widner and Marion conclude in the DEIR's own cited study, "horse traffic is not the single most important agent contributing to trail degradation," and that equestrians can be no more or less damaging to a resource than hikers or other forms of recreation. The study went on to describe particular instances where equestrians can be educated to minimize or eliminate impacts on the environment and recommended, "Visitor education is one of the few actions which can accomplish both objectives [protecting visitor freedom (from regulations) and protecting environment]. Introducing horse users to the consequences of their use and encouraging them to adopt improved low-impact horse use practices can greatly reduce impacts and may eliminate the need for more direct and restrictive regulations." With the elimination of equestrians from the trails within Anza-Borrego, it appears that the authors of the DEIR ignored the recommendations found in their own cited study. Further, the DEIR does not cite any studies proving that horses "spread ... exotic vegetation," (and again at page 3-25) and in fact, there are no valid studies that can prove this. Studies conducted by Dr. Rob Atwill of University of California at Davis have concluded that horses are not vectors of exotic weed seeds.

In the cataloging of the endangered plant species within the park, a curious notation is found at page 2-50, "This plant [Arizona Carlowrightia] occurs along regularly used hiking trails and is likely to be impacted by passing hikers." This sentence appears to contain an oxymoronic statement; how can a plant thrive along a hiking trail, and yet be in danger from hikers? To the contrary, it would seem from this casual, unattributed citation that hiking trails actually aid the survival of this particular species. My point is this: throughout this section of the DEIR, the personal observation of the rangers are cited regarding various plant and animal species, but with such confusing conclusions as the one found on page 2-50, just how accurate and scientific and unbiased are any of those findings, and how can these potentially misleading prejudiced personal observations be justifiable means for trail closures, or any other recreational restrictions?

Although at page 2-106, the DEIR states, "Equestrians use can be a great opportunity to enjoy the Park in the same way as early pioneers," a conflicting statement is found at page 2-90, ". . .Equestrians are not allowed to travel off of the roads in the Park." In practice, equestrians are constrained from a great opportunity to enjoy the Park in the same way as the early pioneers—modern equestrians cannot travel on the same routes that those very pioneers traveled by horseback.

In the proposed updated Declaration of Purpose, found at page 3-6 in the DEIR, there is reference to ". . .making available these treasured qualities and experiences for present and future generations." A large part of what makes Anza-Borrego so treasured and so unique is the opportunity to imagine life as a pioneer or a settler as one crosses the desert using the same mode of transportation they used so many years ago. I would hope that my daughter can have that same experience without the interference of park managers who so obviously have a personal bias against equestrians. In order to preserve cultural sites, at page 331, the DEIR states, "Mitigative measure should be implemented where appreciable damage to sites is identified." There is no reason why mitigation through trail rerouting, or other viable methods, cannot be used to reopen trails to equestrians in order to protect any nearby resources. The park's own rangers patrol trails, currently closed to the equestrian public, by horseback, so obviously equestrian usage is not deemed to be a danger to cultural resources that requires the park to find alternatives to equestrian patrols! It's the "do as I say, not as I do" attitude that is so hostile and seemingly arbi-

trary. Furthermore, at page 3-35 of the DEIR, it states, "Include outreach efforts to develop partnerships with and support from the community for. . .environmental education." The paper regarding horse impacts, cited earlier, written by Widner and Marion, was a treatise on the education of the equestrian public in the "leave no trace" backcountry ethic, and yet the park has made no effort whatsoever to include partnerships with any recreational stakeholders, let alone equestrians. Certainly, there exist many equestrian groups, including the DEIR's own study authors, that advocate the education of equestrians (and indeed all backcountry recreationalists) and includes my own group, the Backcountry Horsemen of California, which conducts workshops throughout the state on proper backcountry etiquette. The Backcountry Horsemen of California is ready and willing to form a partnership with the park to educate equestrians on the proper way to travel in the backcountry to minimize or eliminate impacts. I would hope that, as stated at page 3-59, "This Plan may restore some gentle use on historic trails or keep the historic trail intact and provide a parallel route along the same corridor," and that the trails historically used by equestrians be reopened.

I would hope that the park, after the unprecedented and unwarranted helicopter stampeding and then illegal removal of the wild horses of Anza-Borrego in 2003, resulting in tragic consequences for those horses and a loss of that historic resource—which is a federally protected historic resource—without cause and without the required public process, would consider improving its relationship with the equestrian public.

The above comments are by no means to be considered a comprehensive list of the concerns I have regarding the DEIR. I reserve the right to continue to comment on and object to any future, unforeseen, and unfortunately predictably negative changes to the management of Anza-Borrego Desert State Park.

May I also add, as a personal note, that I have been visiting Anza-Borrego Desert State Park since I was an infant, over 45 years ago. Throughout my lifetime, I have hiked, backpacked, camped, flown over, jeeped, horseback ridden, and horse camped in just about every part of Anza-Borrego, and along all of the historic trails that crisscross the park. I love this park as much or more than any of the authors of the DEIR, and hope to continue to enjoy it in the future with a view from the top of a horse, and employing the sound, low impact horsemanship and backcountry skills that I have always used to protect such treasured resources.

As Edward Abbey wrote over 35 years ago in *Desert Solitaire*, "Let the people walk. Or ride horses. . ."

Sincerely,

Marcy A. Watton

Representative of:

Antelope Valley Unit, Backcountry Horsemen of California; Equestrian Trails, Inc.; Antelope Valley Trails, Recreation, and Environmental Council



Aldo Leopold, c. 1911