



THE SIGNPOST

Second Quarter 2025

President's Message:

It's hard to believe it's already June! It seems like we were just in Reno for our conference. We had a great time, and the attendees agreed the presentations and sessions were enjoyable.

Two things I would like to mention: 1) our members are interested in additional training opportunities outside of the conference, and 2) there is also interest in holding a virtual general membership meeting in September.

To help the PRAC board with putting on regional training opportunities, I ask our members to let us know if you're a qualified trainer in any ranger-related training domain and would like to help put on training sessions for PRAC. Let us know if your agency has training opportunities open to outside agencies, and what types of training you'd be interested in attending.

Regarding a virtual general membership meeting, I plan to schedule one for mid-to-late September. Look for announcements in August. Membership involvement in PRAC is vital, as it will help us better guide the association into the future.

Speaking of the future, our 2026 conference will take place at the Handlery Hotel in San Diego, from March 1st through 5th. The room rate is \$129 per night.



You can begin reserving your guest rooms here:

<https://reservations.travelclick.com/98118?groupID=4807027>.

Or call (619) 298-0511 or 1-(800) 676-6567. Refer to the **Park Rangers Association of California Conference** when calling in to receive the discounted room rate.

Look for additional information in the coming months. Please let the conference committee know if you have any questions or would like to present: candi@calranger.org; Richard@calranger.org; norma@calranger.org.

Finally, if you are interested in submitting an article for the next Signpost the deadline will be Friday August 22, 2025

Have a safe summer!

Matt Cerkel, President
Park Rangers Association of California

World Ranger Day 2025

WE STAND WITH THE WORLD'S RANGERS

WORLD RANGER DAY - 31 JULY



On Thursday, July 31st, San Luis Obispo County Parks and Recreation is proud to host California's seventh annual World Ranger Day.

Since its inception in 2006, World Ranger Day has been celebrated annually around the globe to honor the dedication and achievements of rangers and to remember those who



made the ultimate sacrifice in the line of duty. For World Ranger Day, a ranger is defined as anyone working in protected areas, regardless of their job title.

The event will begin at 10:00 AM at the historic Cayucos Veterans Hall, located at Cayucos State Beach. Built around 1877 as the Cass Warehouse, this iconic venue offers a meaningful backdrop for our gathering. Ranger attendees should wear their agency uniforms for this special occasion.

Planned activities include:

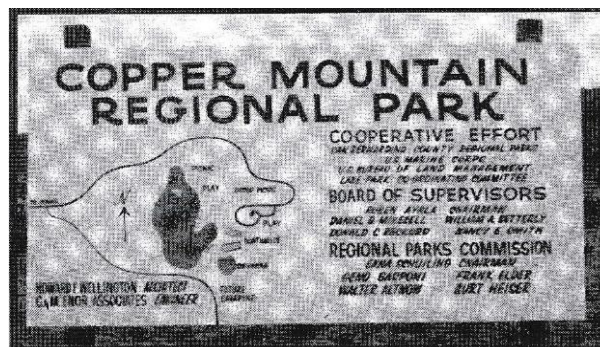
- A keynote address by a distinguished speaker.
- A Ranger vehicle display.
- A group photo session.
- Lunch provided by San Luis Obispo County Parks & Recreation & Cayucos Lions Club.

Please RSVP to Retired NPS Chief Ranger Jeff Ohlfs at deserttravelerZ@roadrunner.com. To assist with planning, confirm "we will attend" or "we will not attend" by June 13th.

The Lake that went down the Drain... A Hi-Desert Unsolved Mystery

By Claire I. Smith

Hi-Desert Magazine, Spring 1997, copyrighted material, used with permission of Hi-Desert Magazine.





In May 4, 1967, special Joshua Tree supplement to the Desert Journal, a Hi-Desert newspaper published by Bert and Leona Gholson, an enthusiastic description of a new project included these words: "Sails in the sunset, a ripple on the water, lemonade, laughter and light hearts,, that's the stuff vacation dreams are made of And now, all this will be right here in the Hi-Desert!"

Two years before, the notion of creating a regional park at the site of an old dry lake in the Copper Mountain area of Joshua Tree had been presented to San Bernardino County's Board of Supervisors. The park was to include a one-acre swimming lake surrounded by grassy shores and a larger fishing and boating lake. A thousand trees would be planted, and there would be a campground, picnic area, and restrooms.

Walter Altnow, Regional Parks advisory committee member, aided by Ralph Davis of Desert Holiday office and Paul Wishek, a member of the Mojave Water Agency board, traveled many miles and worked many hours to attain approval for the ambitious project. With others, they formed a "Lake Coordinating Committee," their letterhead bearing the slogan, "First the Land, then the Water, then the Whole Lake."

The article in the Journal reported that the State Parks Department, the County Regional Parks Department, and all of the communities of the Hi-Desert were pooling their resources. Fundraisers were being held, and donations were solicited. Land for water wells had also been donated. It was expected that the initial stage of the project could be completed in 1967 and that \$70,000 in State funds had already been allocated. County surveyors were photographed with their instruments at the lake sites.

Lakes in the desert!? Well-why not? Especially when the community could call in the Marines! Officials at the 29 Palms Marine Base, recognizing the value of a joint civilian and military endeavor, got into the act, agreeing to use personnel and equipment to do the grading to County specifications as a training exercise for marines.

Over the next year and a half, engineering plans were drawn, and heavy equipment set to carve out the berms around the lake sites that would protect them from sand or rainstorms.

The larger fishing lake would also include an island, and a great deal of labor went into creating this feature.



When Brigadier General Carl Hoffman took command of the Base in 1969, he took a personal interest in the project and was often seen at the site checking progress. At night, the site was guarded by both a Regional Parks watchman and a marine sentinel.

The two deep wells that would supply the water for filling the lakes were put down. Morongo Basin residents contributed over \$6000 in small cash donations, and the County had received more than \$200,000 in state bond funds for the project.

In the last week of July 1972, residents, marines, and county staff dignitaries gathered at the site. The band played, speeches were made, and the Marine Base chaplain gave a benediction. The taps were turned on, and the wells began delivering water into the two lakes.

By the evening of July 27th, the swimming lake was about filled and the boating lake was within two feet of its full capacity. The next step was to be the landscaping and construction of campgrounds.

That night, the Richter scale recording instrument located in the Joshua Tree National Monument registered a local earthquake measuring between 2.75 and 3.0, but no one apparently noticed the event. It was on the evening of July 28th that a much more significant event took place, one which certainly attracted attention—and it occurred at the site of the brand new Copper Mountain Lakes.

Following are reports from two of the observers.

Glen Hall, Regional Park night watchman: "My wife and I suddenly heard a sound like a herd of elephants going into the water."

The sound had seemed to emanate from the fishing lake area. Hall ran in that direction. From the shore, he could see several large holes in the island and then watched, amazed, as the water began to disappear.

Brigadier General Carl Hoffman: "Our night sentry at the site was standing his lonely vigil when he suddenly heard the strangest sound he'd heard in his young life. He described it later as the loop-whoosh' that would be produced by a hundred toilets all flushing at once."

Sunday morning brought many observers who could only stand and watch helplessly as



cracks up to 30 ft. wide and other huge holes opened, completely caving in the island and then spreading throughout the entire fishing lake, eventually swallowing approximately 16 million gallons of water, as reported later in the Hi-Desert Star newspaper. By Tuesday morning, the last small puddles were disappearing, and nothing was left but a desolate, muddy tract.

There would be no Copper Mountain Regional Park. Although no damage occurred to either the swimming lake or the two wells, after many months of pro and con review and considerable acrimony by supporters who advocated either the repair of the lake or modification of the project to include only a small fishing lake, the County Board of Supervisors voted 3 to 2 to abandon the project. (The writer was interested to note that one of the two dissenters to abandonment was Dennis Hansberger, then serving his first term as a supervisor. Hansberger recently won a new term as Supervisor of the Third District after many years away from the political arena.)

Reports of the dollars that went down the drain with the lake vary greatly. Hi-Desert Star reports of the time mention amounts such as direct cost to the taxpayers of about \$105,000, plus \$6,000 for the Pioneer feasibility study and loss to the County ranging from \$393,000 to \$573,000 as the cost of termination. Additionally, the Marine Corps had contributed at least \$200,000 in labor and equipment.

First District Supervisor James L. Mayfield supported the decision to abandon, citing a report prepared by Pioneer Testing Laboratory, which indicated that there could be no guarantee that a similar situation would not again happen. Mayfield stated that because of the fear of additional natural phenomena occurring in the area, no further recreational use, either wet or dry, should be considered.

Despite an attempt by the Joshua Tree Chamber of Commerce to get the County Grand Jury to investigate the project's cancellation and to force the supervisors to "cease and desist all activities to terminate the project or dismantle the park," pending the investigation, the Copper Mountain Regional Park Lakes project was all over.

What had, in fact, happened? To this day, opinions vary greatly. Investigating scientists could not agree: "It was the result of a locally centered earthquake "; "It was caused by an earth 'slippage' that would never happen again"; "There must have been a cavern under the old lakebed. The weight of the new water on top of it caused the cavern roof to collapse, breaking open the first holes."



To this writer, many years later, this last theory seems the most plausible sort of a 'domino' effect?' As for the earthquake the evening before pure coincidence?

Only Mother Earth knows the answer to the mystery-and she'll never tell!

Claire I. Smith was the publisher and editor of Hi-Desert Magazine and a frequent contributor to its pages.

Codes to Know: Laws of Arrest

By Matt Cerkel

As uniformed public employees, park rangers should be familiar with the laws of arrest and which applies to them.

California's laws of arrest can be found in Penal Code sections 833 through 853.93:

https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PEN&division=&title=3.&part=2.&chapter=5.&article=.

Key sections include: 835; 835a; 836; 836.5; 837.

Nevada's laws of arrest can be found in Nevada Revised Statutes 171.124 through 171.1375.

<https://www.leg.state.nv.us/nrs/nrs-171.html#NRS171Sec124>.

Key sections include: 171.124; 171.126; 171.136; 171.137; 171.1375.



Understanding the Role of Public Officers: Park Rangers in California

By Kyle Roberson

In California, public officers fulfill a range of enforcement roles distinct from both general government employees and fully sworn peace officers. Among them, park rangers occupy a unique space. Depending on their classification, they may either be public officers or peace officers—each status granting different levels of authority, particularly regarding arrests, investigations, and detentions.

Park Rangers as Peace Officers vs. Public Officers

Under California Penal Code § 830.31(b), local park rangers may be designated as peace officers if they are regularly employed in that capacity and their primary duty is law enforcement within parks. This designation allows them to carry firearms, make arrests for observed or investigated violations, and detain individuals as part of an investigation—powers comparable to those of police officers, but limited to their assigned areas. Since the institution of Public Resource Code

§ 4022 all agencies newly establishing a classification of “Park Ranger” must commission those rangers as peace officers. Agencies which had park ranger classifications existing before 1990 may continue employing rangers without commissioning them as peace officers. With this grandfather clause, there still exists a mosaic of ranger classifications across the state.

Many rangers are still designated instead as public officers, a classification with significantly more limited legal authority. These rangers are empowered under Penal Code § 836.5, which allows them to make a warrantless arrest for a misdemeanor only when:

- The offense is committed in their presence,
- It is a violation of a statute, ordinance, or regulation they are explicitly tasked with enforcing,
- And they proceed immediately to arrest.

Key Legal Limitations of Public Officer Park Rangers

Unlike peace officers, public officers do not have the legal authority to detain someone for investigative purposes. This creates a strict procedural framework for enforcement:



- They must personally witness the violation. Suspicion alone—based on reports or circumstantial evidence—is not enough to justify detention or arrest.
- They cannot detain someone to investigate further. Doing so would constitute unlawful detention under Penal Code § 236, which defines false imprisonment.
- They must arrest by notice to appear (citation). If a public officer initiates an arrest (which under PC § 836.5 is immediate upon witnessing the offense), they cannot simply release the person with a warning. To do so, without issuing a citation or taking the person before a magistrate, may constitute a violation of the arrestee's rights under Penal Code Sections § 836.5 and § 236, and lead to liability for false imprisonment.

Example Scenario

Consider a public officer park ranger who witnesses a park user violating a municipal ordinance—say, walking a dog off-leash in a protected wildlife area. If the ranger stops the individual, explains the rule, and lets them go with a verbal warning, this may seem like a reasonable and educational approach. However, if that ranger initiated a stop and effectively detained the individual without issuing a citation, they have conducted a seizure of the person, then released them without lawful authority—constituting a violation of PC § 836.5 and PC § 236 (false imprisonment).

For all the public officer park rangers reading this, you're likely saying, "but this is EXACTLY what I do day-in and day-out! What do you mean it's a violation of law!?" The highly nuanced tight rope walk that public officer park rangers must walk is better explained after giving examples of other public officers, then talking about three types of contacts we can conduct.

Other Public Officers

At first glance, the authorities granted in California Penal Code Section § 836.5 seem to fit the duties of a park ranger very well. Public officer park rangers can only issue citations rather than take physical custody, cannot carry firearms, and only arrest for misdemeanor- and infraction- level violations of local law, or state and federal laws expressly identified for them to arrest upon.

This summary of enforcement is a pretty good fit for many parks and recreation agencies who do not want a heavy focus on enforcement, and do not want to accidentally empower a problem employee to create newsworthy incidents. This feels good until we arrive at the



other two restrictions: no authority to detain, and arrestees must be released with a citation.

What type of job classification would benefit from having such a structured and limited enforcement scope? Let's take off the park ranger hat and try on some different ones. Many types of highly structured enforcement officers fit the public officer model very well such as animal control officer, code enforcement officer, solid waste enforcement officer, environmental compliance inspector, and fire abatement officer to name a few. What do all these public officers have in common? These public officers can all conduct patrols of their areas, but then upon noticing a violation of their respective local codes, they will tend to document it in a report and send a violation notice to the parcel owner. Follow-up contacts and interviews are then conducted within the administrative proceedings' envelope and not a passive field contact such as park rangers will encounter.

Of course, the public officers can notice a violation and give a verbal warning, but the officer's contact with the violator must be tactful so as to avoid detainment or arrest.

Three Levels of Encounters

When acting as any type of government-commissioned officer, it is crucial to understand the three types of encounters officers of the law may have with members of the public: consensual encounters, detentions, and arrests. Especially for park rangers designated as public officers rather than peace officers, understanding the distinctions is critical to avoid exceeding the legal authority under Penal Code § 836.5.

1. Consensual Encounter

A consensual encounter is a voluntary interaction. The individual has no legal obligation to engage in the encounter, and no reasonable suspicion or probable cause is needed by the officer to initiate it.

Legal Characteristics:

- The person always feels free to leave throughout the contact.
- The officer shows no authority, restrictive circumstances, or physical restraint.
- There are no legal consequences for the individual to walk away or refuse to answer.

Example:

A ranger sees a visitor off trail and says, "Hey there! Can I talk with you about our designated paths?" There is no language used which creates a demand, no restriction of the individual's ability to move and no physical restraint.



2. Detention (Investigative Stop)

Detention occurs when a reasonable person would believe they are not free to decline the officers' request or otherwise terminate the encounter. This can be caused by the words chosen by the officer, tone, positioning, or other actions or circumstances. Detention must be supported by reasonable suspicion that a law has been violated. It is used to either confirm or dispel that suspicion and then take an appropriate enforcement action available to the officer such as warnings, citations, or physical arrest.

Legal Characteristics:

- The officer uses commands, a firm tone, blocks the path, or demands a physical ID in a way that implies compliance is required.
- An individual's freedom is restricted, even briefly.
- The person believes they would have consequences if they walked away.
- Requires reasonable suspicion (less than probable cause, but more than a hunch).

Gray Area:

Detention does not require handcuffs or physical touching. It is enough if the person's perception – based on the ranger's conduct – is that they are being held.

What a Public Officer Must Avoid:

If a public officer park ranger says, "You're being detained," or blocks someone's path, or retains an ID longer than necessary to just copy information and then allows the violator to go with a warning, but no citation – that's a detainment, and releasing without citation could constitute false imprisonment under Penal Code § 236.

Examples:

- A ranger steps into someone's path to talk with them.
- A ranger says, "*Sit down.*"
- Multiple rangers are standing around the individual creating a situation where the individual feels there will be consequences if they leave (such as touching or manipulating weapons, creating a half-circle or full circle around the individual, etc.).



- Activating overhead emergency lights including a solid forward-facing red light.

3. Arrest

An arrest occurs the moment an individual is advised they are under arrest or when their liberty is being restrained, regardless of whether they are physically taken into custody. A conventional arrest is defined as a seizure of a person for the purpose of making them available to answer pending or anticipated charges.

Under California Penal Code § 835, an arrest is made when:

“An arrest is made by an actual restraint of the person, or by submission to the custody of an officer...” California Penal Code § 841 states the person must be informed they are under arrest and the cause for the arrest must be stated.

Legal Characteristics:

- An arrest can begin the moment the person is told “you are under arrest” or is otherwise clearly not free to go. An arrest can be complete when physical restraint is used or can also be complete when the individual submits to the arrest authority.
- There is no requirement for handcuffs, or to transport the individual (such as citation arrests).
- Arrests must be supported by probable cause (this can easily be achieved in the direct observation of a violation as required for public officers).
- Once a public officer initiates an arrest, they *MUST* issue a citation, or take the person before a magistrate if demanded – they cannot simply warn and release.

What a Public Officer Must Avoid:

Public officer park rangers must be cautious in using language or actions that a reasonable person would interpret as a command to stop or stay.

Under Penal Code § 835, an arrest occurs when someone is either physically restrained or submits to an officer’s show of authority.

Since public officers under PC § 836.5 have no legal authority to detain, any such arrest must result in a citation or magistrate appearance. A mere verbal warning following an arrest would make the stop unlawful and would amount to false imprisonment under PC § 236.

Other phrases which are more nuanced may include:



- *Stay right there!*” This implies the person is not free to leave. A public officer making this demand is restraining liberty.
- *I need your ID before you can leave.*” Seizing ID and commanding someone to stay transforms a consensual encounter into a seizure/arrest.
- *Come here, I need to talk to you!*” A direction like this, especially while in a distinguishing uniform, can cause a person to submit and become under arrest per PC 835.
- *Sit down” or “wait here.*” Restricting movement and controlling the person’s location can create an arrest unless it’s consensual (which would be hard to argue once commands are used).
- *I need your information for my report.*” If paired with language or tone which makes compliance feel mandatory, this can trigger submission = arrest.
- *You’re not going anywhere!*” This is a clear restraint of liberty.
- *I’ll let you go with a warning this time.*” If the person had already been held or compelled to stay, this becomes problematic: an arrest followed by an unauthorized release would be a violation of PC 836.5 and PC 236.
- *You’re being stopped because I saw you break the rules.*” The word “stopped” makes this a very clear restriction of liberty. But even if we changed this to a softer *“I need to talk to you because I saw you break the rules,”* it constructs an environment of guilt and control triggered by that guilt. If the person submits, and a citation is not issued, it would be an unlawful arrest.

Examples of Arrest in Context:

A public officer park ranger sees someone walking with their dog off-lead. The ranger says:

“Your dog must be on a leash. Come here, I need your information for my log.”

This is an arrest for a public officer, even if the person is not handcuffed. A citation must be issued. Since a public officer lacks detention authority, this contact skipped over “detention” and entered a full arrest the moment compliance was demanded. By demonstrating authority and ordering the violator to “come here,” the public officer created an arrest.

Summary



Park rangers designated as public officers have narrow, clearly defined enforcement powers. Their role is not investigative but observational and reactive. They must witness infractions themselves and must proceed directly to cite or arrest. They cannot engage in investigative detentions or discretionary releases.

This sharply contrasts with peace officers, who have statewide jurisdiction and broad authority to investigate, detain, and arrest based on probable cause.

Understanding these distinctions is critical for park personnel, legal professionals, and the public. It ensures proper use of authority and safeguards individual rights while maintaining the integrity of park law enforcement programs.

Under the Flat Hat

By Matt Cerkel



Although I talked about and promoted PRAC's Generalist Ranger Certification Program, I had not completed it. Last year, during my performance appraisal, I was asked to have two career goals, and my first was to complete the certification process. At the end of April, I finished the process of earning my PRAC Generalist Ranger-Public Safety certificate, and at next year's conference, I will be formally issued my certificate. I encourage other rangers to start the process and become certified generalist park rangers.



I've also been working with PRAC's Standards and Training Committee on how to improve PRAC's Generalist Certificate Program and training for park rangers. One step is to encourage agencies to adopt the certification program for their ranger program.

At the September virtual general membership meeting, we will announce some revisions to the program. So, stay tuned for that.

A second goal I was assigned as part of my work performance appraisal was to draft revisions for my agency's job descriptions. The end goal of the revision was to list the steps and requirements needed to progress from Park Ranger I to Park Ranger II to Senior Park Ranger.

The old job descriptions were vague in many sections and often did not adequately define the required training needs for career development and advancement. For example, the Senior Ranger lists completion of "S-231 Engine Boss" training without mentioning the prerequisites for that course, including certification as a Firefighter Type 1 (FFT1), which requires completion and sign-off of the Position Task Book for FFT1. Not knowing the steps needed to advance career-wise may prevent a person from learning how to advance in their career.

These two items are related. During a recent meeting of the Standards and Training Committee, our new committee member, Park Ranger Joel Holmes from the City of Chico, brought up career roadmaps and provided a couple of samples from the USMC.

A career roadmap is designed to support a job-series professional development of technical competencies and training. The career map is further organized by a group of competencies, which together define successful performance in the job series for which it was developed.

Career roadmaps are essential resources for career development and helpful in identifying the knowledge and skill-sets needed to meet and/or enhance their skills in this occupational series.

Here's an example of the USMC Police Career Roadmap

<https://www.hqmc.marines.mil/Portals/138/Docs/PS/COI/0083-Police%20Career%20Roadmap%20Sept%202018.pdf>



Our certification program and job descriptions are not career roadmaps, but they can help define a career roadmap. As one of my career goals, for my next job performance review period, I'm going to draft a career roadmap for my agency's park ranger series.

I also believe PRAC should develop a park ranger career map sample and template based partly on the PRAC generalist certification standards. Providing our individual and agency members with both a career roadmap sample and template will be beneficial to the park ranger profession in California and Nevada.

I am looking forward to this project.

From The Archives
The Signpost March-April 1999
[3/99 Signpost](#)
Park Rangers are Peace Officers?!?!?
By Jeff Gaffney

This is directed to peace officer park rangers (if there is some question as to whether you are a peace officer or not please call or e-mail me and I'll try to help). Since my recent appointment to organize the law enforcement committee for PRAC I have been making calls and putting to gather a committee. In my conversations with people I am amazed at what cities, counties, and special districts leave their park rangers to believe as to what their authority and status is. In no way do I profess to be an attorney or legal expert. I have however collected numerous Attorney Generals opinions and Appeals/Supreme court rulings. The courts look to the Attorney General in these matters since he/she is the chief law enforcement officer in the state. I will briefly summarize what the Attorney General and the Appeals/Supreme Courts have determined over the last 20 years and I will then list the reference sections at the end (they aren't the most exciting reading but they are definitive).



Previous to 1980 there was some mention in the statutes of the limitations to peace officers authority. It mostly had to do with carrying firearms or carrying them into the state capitol. Another limitation was while engaged in their duties (this limitation never was applied to park rangers). From 1980 through 1984 there was a major revamp to these statutes, the restrictive language was taken out of the peace officer references for park rangers. The only restriction that was left was an agency has the choice to arm their park rangers or not. The legislature felt that local agencies have a stake in any law suit that would be brought against them (involving the use of deadly force) and therefore gave them the option of arming their park rangers.

The problems arose when agencies thought that this limited the authority and status of their park rangers. The Attorney General and Supreme courts have been very clear on this matter, the state legislature defines and regulates peace officer authority not a local government. Sections 830.31- 830.37 (park rangers are under 830.31) have been grouped together as specialized primary duty peace officers. This means they have the same authority and status as other peace officers. They just have a primary duty such as ours, protecting the park and other property of the agency and the preservation of peace therein. (In this sense they are specialized.) This does not prevent someone from making an arrest anywhere in the state in accordance with 836 of the Penal Code. There are also sections of various codes (i.e. Business and Professions 25619) that place general enforcement duties on all peace officers, B&P 25619 requires all peace officers to enforce the provisions of the Alcohol Beverage Control Act. It does not specify while in or out of uniform or on or off duty. The employer can direct a peace officers enforcement actions but can not limit them to merely local ordinances or municipal codes.

In the interest of keeping this brief I will wrap it up. Park rangers are 24-hour peace officers on-duty all of the time. They can carry concealed firearms while not working for their employer regardless of the employers policy. There has been five Attorney Generals opinions and two Supreme Court rulings outlining this authority. Since an employer can not and does not control whether someone can carry a gun to go hunting, the same holds true for carrying a concealed weapon. This is allowed by law for "...other duly appointed peace officers..." as stated in the Penal Code.

In contrast there were limitations placed on some peace officers. For example 830.5 of the Penal Code. They were limited to being peace officers while engaged in the performance of their duties and the legislature also wrote into the statute (830.5) who may carry firearms off-duty. No such restriction occurs in 830.31- 830.37 PC.



The below referenced sections are definitive and clear on these issues. Please feel free to stop by your local law library if you want further clarification. If you want to call me with questions my number is 408 779-3634.

Case Law:

Orange County Employees Assn., Inc. V. County of Orange (1993) 14 Cal. App. 4th 575, 17 Cal. Rptr.2d 695

County of Santa Clara V. Deputy Sheriffs Assn.. (1992) 3 Cal.4th 873, 13 Cal.Rptr.2d 53; 838 P.2d 781

People V. Derby (1960) 177 Cal. App. 2d 626, 2 Cal.Rptr 401, 404

Attorney General Opinions:

63 Ops.Cal.Atty.Gen. 385, 388 (1980)

64 Ops.Cal.Atty.Gen.835-836 (1981) 65 Ops.Cal.Atty.Gen. 527-534 (1982)

70 Ops.Cal.Atty.Gen. 20 (1987)

Opinion numbers 81-714, 81-1216, and 89-505 inclusive





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Thanks for reading! Please [let us know](#) if you have ideas for what you would like to see in future issues of The Signpost.