Summary of Comments Received in Response to Red Rock Canyon State Park General Plan Preliminary Plan Concepts

September 2019

Preliminary Plan Concepts Public Meetings Outreach

The California Department of Parks and Recreation (State Parks) is revising the Red Rock Canyon State Park (RRCSP) General Plan and preparing an associated Environmental Impact Report (EIR). As part of the planning process, State Parks held public meetings in Lancaster and Ridgecrest on March 26th and 27th, 2019 to discuss four preliminary planning concepts for the RRCSP General Plan revision. At these open-house style meetings, the four preliminary planning concepts for the General Plan revision were displayed, and feedback was solicited from interested stakeholders and agencies. Attendees visited plan concept and RRCSP existing conditions display stations, reviewed materials that describe the preliminary plan concepts, provided input, and asked questions. Materials provided at the meetings included a written comment card; an informational packet, which included information about the General Plan revision purpose and background and the four preliminary planning concepts; definitions of routes, use zones and State Park (SP) and State Recreation Area (SRA) classification; and exhibits representing the draft concepts and existing conditions at RRCSP. These materials were also posted online on the project website at www.redrockgp.com. The information packet provided at the General Plan Revision Preliminary Plan Concepts Public Meetings, which includes the preliminary planning concept maps, can be downloaded [here](https://www.redrockgp.com/public-meetings).

Comments on the preliminary planning concepts were solicited through August 1, 2019. There were three ways to provide comments: (1) submit a completed comment card at one of the public meetings; (2) mail the comment card to California Department of Parks and Recreation, Attn: Katie Metraux, Planning Manager, 1725 23rd Street, Suite 200, Sacramento, CA 95816; or (3) submit comments in an email to info@redrockgp.com. Information on the public meetings and instructions on how to provide comments were also posted to the project website at www.redrockgp.com. This information was sent out in an email blast and by U.S. mail if specifically requested.

The public meetings for the preliminary planning concepts were held in the evening of March 26, 2019 at the University of Antelope Valley in Lancaster and on March 27, 2019 at the Historical Society of the Upper Mojave Desert in Ridgecrest. Approximately 25 people attended the meeting in Lancaster and approximately 21 people attended the meeting in Ridgecrest. Individuals sent approximately 260 comments. There were approximately 3,867 form letters received from the public.

The following is a summary of the comments received and the key issues raised during the comment period. The summary identifies off-highway vehicle (OHV) access;
however, it should be noted that only street-legal motorized vehicle access is allowed within RRCSP.

Concept #1: This concept would require approval by the State Park and Recreation Commission to change the classification from State Park to State Recreation Area. This concept is closer to the existing conditions with additional resource protection.

Concept #2: This concept would require approval by the State Park and Recreation Commission to change the classification from State Park to State Recreation Area. This concept is similar to existing conditions, but with more changes to the primitive route network and more resource protection.

Concept #3: This concept would maintain the existing State Park classification. Most Designated Primitive Routes would not allow green stickers. Some primitive routes would become non-motorized trails. Expanded sensitive resource zone, natural and cultural preserves and expanded non-motorized recreation.

Concept #4: This concept would maintain the existing State Park classification. All Designated Primitive Routes would not allow green stickers. Some primitive routes would become non-motorized trails. This concept has the highest level of resource protection with additional natural and cultural preserves and expanded non-motorized recreation.

Next Steps
State Parks will review and consider all feedback obtained through this set of public meetings and public comment process. This includes feedback on the preliminary planning concepts, park management, and the overall General Plan revision and planning process. This summary report will be posted on the project website, www.redrockgp.com.

During the next step of the planning process, the planning team will use the input received, along with other relevant resource information, to develop a single “Revised Plan Concept.” The Revised Plan Concept will be presented to interested parties in another round of public meetings, currently anticipated for October 2019.

Summary of Comments
The following are comments from interested members of the public and organizations listed below. The comments described in this document have been summarized and grouped thematically and by subject; however, it should be noted that this document is a summary and therefore does not represent a collection of individual comments.

Existing Conditions Map

- Some trails lead to steep declines; should be marked on maps
- Concepts do not explicitly state what would be changed from existing conditions regarding road closures
- Mark the dry creeks, which tie trails together
- Existing conditions are not reflected accurately
- Existing Conditions map shows “non-motorized” trails that should be shown as “motorized” to accurately reflect existing use
- Existing conditions should reflect all decisions implemented since the 1982 GP, including designated routes
- Does not include all roads and trails in the park, shows Nightmare Gulch as non-motorized trail ... this conflicts with "temporary" closure
- Leaves off some roads and trails
- Excludes routes that are currently open
- Map the concepts are based on are incomplete, do not reflect existing conditions
- “Old maps” are not accurate
- Red Rock Plan 1988 Amendment 6 confirms that Nightmare Gulch is an existing route open to motorized use, which should be reflected in the Existing Conditions map for all Concepts

Specific Comments about Concept #1

- Both support for and opposition to Concept #1
- Clarify why a parking area is shown next to a road proposed to be converted to a hiking trail in Concept #1
- Many commented to include a “modification” to reopen Nightmare Gulch and Last Chance Canyon for motorized access
- Rockhounder support for Concept #1
- Concept #1 allows access to “everyone;” walk-in-only limits access for people with disabilities and older people
- Eliminating OHV use is discriminating for those with disabilities; limits full public access
- Support to “remove the unnecessary fencing”
- The least restrictive concept is still not satisfactory

Specific Comments about Concept #2

- Both support for and opposition to Concept #2
- Want the park to be reclassified to an SRA

Specific Comments about Concept #3

- Both support for and opposition to Concept #3
- Concepts #3 and #4 should better link green sticker use to take pressure off habitat areas
- Reduce motorized activity and protect birds of prey

Specific Comments about Concept #4

- Both support for and opposition to Concept #4
- Concept #4 best supports the two adjacent Areas of Critical Environmental Concern for the Mohave ground squirrel and the Fremont-Kramer area
• Concepts #3 and #4 should better link green sticker use to take pressure off habitat areas
• Concept #4 is highest preference for protection of natural and cultural resources, improves hiking and equestrian experience
• Recommend restoration of eroding vehicle trails, decreasing vehicular recreation
• Vehicular route through Lower Red Buttes would cut across culturally sensitive area. Red Buttes is a Traditional Cultural Property

Non-Motorized Recreation
• Need more connecting trails to replace rock house and Cudahy Mine
• Nightmare Gulch should be reopened for hiking and riding – and would like to volunteer in the planning process
• Pacific Crest Trail connector trail could be possible, if so, concerned about motorized users on the trail.
• Proposed closures of roads should be reclassified to non-motorized
• Rock and mineral collecting as recreational activities should be allowed
• Rockhounding should be allowed in the State Park. This subject needs clarity being that other State Parks are enforcing different rules.
• East side of Highway 14 provides unique rock hounding opportunities
• This park provides the only known place in California where opal is found
• Add camping access, keep camping areas quiet away from OHV
• Add backpacking opportunities
• More hiking access
• Allow rock hounding in the park

Equestrian Access
• General support for accommodation of equestrian uses
• All trails and trailheads be open and accessible to equestrians
• Non-motorized trail definition should be changed to include equestrians
• Donley Equestrian Camp is not used because it’s not conveniently located
• The Ricardo day-use parking area is a good location for a new horse camp and it has better access to Nightmare Gulch trail
• Nightmare Gulch should be open for equestrians; parking for horse trailers needed; preference for loop trails; large rocks are dangerous for equestrians
• Trailers of all sizes need access to parking; trail heads with horse trailer parking needed at Last Chance Canyon
• Equestrian use is not safe with OHV activity in the same area
• Do not omit equestrian access from the “non-motorized trails”

Opposition to OHV Use
• There are other nearby areas for recreational OHV activities (Jawbone, Onyx Ranch); There is already comparable room in the area for vehicle recreation activities
• Oppose OHV use in Red Rock
• Dust concerns - Concerned about dust for the downwind residents in Indian Wells Valley
• Impacts archaeological and historical resources
• Limit OHV travel to existing roads
• Eliminate “green stickers” [OHV registration type]
• Kills shrubs and mycorrhizal fungi
• Impacts archaeological and historical resources
• OHVs are not safe with hikers —“dangers of an OHV coming around the corner”
• OHV destroys solitude
• Noise disruptions to serene environment
• Spores of Valley Fever are endemic in alluvial soils in Kern County – dust from OHV poses public health risk

Support for OHV use
• OHV use is the “majority” of the park users
• A Concept should include increased motorized access
• Recognize value of OHV use on designated routes
• Maintain current motorized access
• Motorized access is necessary for disabled and elderly to enjoy the Park
• There is little evidence of environmental damage due to vehicular travel
• Red Rock is a special place to ride due to difficulty of terrain
• Increases in restrictions [for areas to ride OHVs] have made it more crowded; more safety hazards with increased confinement of areas for OHV use
• Continue OHV access to/reopen Last Chance Canyon, Goler Gulch, and Nightmare Gulch
• Some comments do not request re-opening the areas of the park to OHV, but preserve existing OHV trails
• RRCSP is a place for family memories using OHV as an activity
• Don’t restrict access for OHV use

Plant-related Comments
• Recent observations of rare species were made, and there may be more to discover
• High conservation value - lists of special status species
• Many rare plants are located too close to parking and roads; remote sites for plants need to be explored
• Preserve rare plant species found in the “super bloom” area
• Plant surveys needed to be done as there are rare and new plant species
• Climate change is also impacting the flora and needs to have extra protection
• Protect native plants
• Protect biodiversity preservation (Executive Order B-54-18)
• Preserve endemic flora and fauna

General Preservation Support
• Support all cultural resource protection and restoration
• Support desert linkage networks which are important for wildlife migration and conservation of species especially with respect to climate change
• Fragile desert ecosystems; OHVs are damaging
• Do not support any planning alternatives that would reduce protection for natural cultural and scenic resources
• Value the unique natural and cultural resources
• Maintain natural resources and beauty
• Protect unique resources
- Protect natural resources do not lessen protection
- Respect use of land and preserve it for the future
- Protect resources and areas for studies
- Preserve solitude and peaceful experience with nature
- Protect geologic resources, springs, paleontological resources, washes, plants, animals, tectonic and earthquake studies, beauty
- Coordinate with U.S. Bureau of Land Management (BLM) to ensure that multiple use activities allowed adjacent to the Park are compatible with the Declaration of Purpose of the Park for management of the natural and cultural resources. Protect the park boundary by securing use restrictions for motorized vehicle use, firearm use, livestock grazing, mining, and communication sites on BLM-managed lands within approximately half mile of the boundary.
- Preserve Federal Endangered Species Act and California Endangered Species Act protection
- Cited Public Law 103-433 The California Desert Protection Act of 1994. Desert Protection Act - support for protection of natural and cultural resources
- Cultural resources of Native American peoples exist in the park and should be protected
- Traditional Cultural Place is well documented as a place where Native American ceremonies take place today and have occurred here for a long time.
- Red Buttes meets the definition of a Traditional Cultural Property under the National Register of Historic Places criteria
- Center for Research in Traditional Culture of the Americas
- Very important historical and ongoing cultural site for the local Kawaiisu People. Highly significant cultural resources are present in the park; elders have been using for reburial; geoglyphs; El Paso Mountains is a sacred site as listed by the Native American Heritage Commission
- Protect cultural resources of the local Kawaiisu people
- Protect indigenous populations
- Protect archaeological sites
- A study of historical and archaeological sites from 2004-2006 concluded that damage related to vehicles use consists of a variety of damages
- Request that State Parks address issues regarding maintaining artificial and natural water sources for wildlife
- Concern for the direct and indirect impact on the recovery and survival of the desert tortoise
- Concern for the protection of desert tortoise, damaged habitat, as RRCSP is an important area for desert tortoise populations
- Document desert tortoise habitat in the Environmental Impact Report
- Fossils and finite paleontological resources present in RRCSP area
- Existing Conditions does not mention the fossil resources

**Park Classification Comments**
- Both opposition to and support for reclassification from SP to an SRA
- Last Chance Canyon area should have an SRA classification
- Support reclassification to SRA as recreational rockhounding can be more readily allowed
• “reclassification [is] a breach of the public trust”
• …“the Desert Protection Act of 1994 transferred land to RRCSP with the specific Congressional intent of reversing prior recreational damage. The legislation specifically emphasized management of this acreage to provide maximum protection for the areas scenic and scientific values.”

Routes
• The map shows a road going from the west side of Highway 14 and travels south around the southern edge of Hagen Canyon Natural Preserve. This road, up until about a year ago, used to continue west across the wash and intersected with the Powerline Road represented as running along the west border of the park going north and south. That road should go all the way through as it did before.
• Keep Pinnacles Trail open from Cudahy Camp to Snow White Mines. Do not improve the gatekeeper on the north side of the trail. This trail is highly technical, and the gatekeeper has served as a natural safety deterrent since it has been there.
• Keep the Opal Mines and the Opal Trail open. This has been a historic pastime for many generations. Yes, they can be improved, but please do not remove our OHV access from them.
• Keep Graduation Hill open for OHV access north of Cudahy Camp.
• Keep Route 86B (recently renamed Joshua West and Joshua East) open. This route is an important section of SMTS #6 providing motorized access across the state of California.
• Why would these be closed, why are there so many name changes, who is responsible for naming these, and has the California State Motorized Trail System been realigned with public comments?
• What is the justification of closing motorized routes “to the majority of users”? 
• Change "Designated Primitive Route" to “Semi-Primitive Motorized Route” or “Roaded Natural Route”
• Remove "primitive" from "Primitive Route Closed to Public"
• New trails – make fully accessible
• Trails labeled as “non-motorized trails” should be labeled as “motorized,”
• Existing roads proposed as closed should be designated as non-motorized trails
• A contributing organization produced a map containing what they believe to be the most responsible, balanced, access-based proposal for the State Park
• Use the maps from the contributing organization as the basis to develop an “Access Alternative” to be used in the planning process; Parks should then solicit comments on this Alternative
• Connectivity between El Paso and Dove Springs is important for motorized travel
• Suggest using cherry-stems and corridors for motorized access to lands within proposed preserves
• Suggest other trail designs and plans for the general plan
• Include a Concept that retains Black Rock Canyon Road, Last Chance Canyon Road, and Nightmare Gulch Road open

EPM 107
• Open EP107 so BLM can establish Full-Size OHV access to the south side vistas and quick access to local attractions.
• EP107 trail needs trailhead marker to be repaired with jeep sticker included.
EP 107 is not included in concepts; should be retained with primitive road system

**Highway 14**
- Maintain connectivity and access from Highway 14 and Red Rock Randsburg Road
- Road from west side of Highway 14 south around Hagen Canyon Natural Preserve should be shown to continue west and intersect with Powerline Road

**Iron Canyon Road**
- Iron Canyon Road should remain open for vehicular travel for access to scenic areas
- Keep Iron Canyon open because it is the safest provision of ingress/egress for Highway 14 and Ricardo Campground via Hagen Canyon Trail under the bridge. It is also the only current passage that allows for safe travel to either side of Highway 14.

**Sierra View Road**
- Sierra View Road needs green sticker access as a minimum to allow connectivity from Dove Springs to points east

**Last Chance Canyon**
- Frustration that Last Chance Canyon is shown as closed in maps
- Propose constructing a new route to connect Last Chance Canyon with Cudahy Creek

**Cudahy Creek Road**
- Oppose closure of roads through Cudahy Area, ruling related to vehicle access in Anza Borrego State Park stated that “vehicle travel over this area does not disturb archaeological integrity of the site”
- Cudahy Creek Road should be retained as part of the primitive road system; potential seasonal use if there are potential impacts to biological resources
- Include a Concept that depicts Cudahy Camp as a Sensitive Resource Zone as opposed to Natural Preserve
- Cudahy should be a sensitive zone/natural preserve rather than natural preserve for connectivity purposes

**Nightmare Gulch**
- Stop off-road vehicle activities within Last Chance Canyon and Nightmare Gulch and conduct restoration.
- Open Nightmare Gulch to motorized travel; place barriers at either end of the gulch as close as possible to the mouth of the canyon if needed for resource protection to allow for hiking access
- Parking area should be added to northeast end of Nightmare Gulch
- Suggest a concept that retains open Black Rock Canyon Road, Last Chance Canyon Road, Nightmare Gulch Road, depicts Cudahy Camp as sensitive resource zone instead of natural preserve
- Nightmare Gulch should be included as open to motorized access in a Concept
- Include motorized access to Nightmare Gulch
- Keep the “historic primitive 4x4 culture” and 4x4 access to Nightmare Gulch
- Want more information on Nightmare Gulch - photos, staff who assessed trail, accidents or injuries, cultural resource issues identified
- Request documentation of issues related to Nightmare Gulch or Last Chance Canyon
- Disagree with the statement that the canyon is an archaeological site
- Canyon collapses during storms or flash floods, when no one is in the canyon, therefore not posing a safety hazard
• “Violations of CEQA” by not considering opening Nightmare Gulch or considering mitigations for its closure

Blackrock Canyon
• Oppose closures to vehicle access through Blackrock Canyon
• See previous statement [Nightmare Gulch] regarding vehicle access not having the potential to disturb archaeological sites
• Request to receive studies that confirm that Black Rock Canyon is a cultural resource site – would like it to be a hiking or equestrian trail

Park Operations/Facilities
• Oppose joint Onyx State Vehicle Recreation Area (SVRA)/RRCSP Operations Hub
• Premature to plan an Onyx/Red Rock Operations Hub
• Additional operations for management and administration of Onyx SVRA be located at Jawbone Station
• Onyx SVRA operations should not be operated in RRCSP
• Improve visitor center near Ricardo Campground, need more interpretation
• Not enough ranger presence
• New campgrounds - overflow at Opal Canyon, group camping at Donnelly for scouts
• Opposed to the proposed expansion of the visitor center – unnecessary expense
• More interpretive and educational trail signs

General Comments
Planning process
• During the Public Lands Roundtable meeting, it was mentioned that your department has not received many comments from the Off-Road Community regarding the Red Rock General Plan. Asking for additional time to gather comments from those not heard from yet, and those that have sent comments to other departments
• Concern that State Parks provided inaccurate and incomplete maps at their public workshops
• Request for a copy of Primitive Roads Map #17498 and the entire appendix of the 1982 General Plan for RRCSP
• Objection to developing a Preferred Concept until Proposed Concepts address issues raised by the public concerning correct information reflected in maps:
• Request to analyze a wider range of alternatives
• Outreach meetings were confusing to the public because there was no formal discussion at the meetings, no guidance for attendees. No mention in packet of number of resources in the park. Confused by feedback process.
• Opposed to all concepts - submitted a Concept #5, which provides access and conservation.
• No support for any planning concepts
• No concept provides level of conservation necessary to protect resources
• Update the Resource Summary from 2003
• Concepts were not accompanied by enough additional detailed text
• Primitive roads should have been defined
• Motorized vehicle use, firearm use and cattle grazing should be addressed in the revised General Plan, as these human activities are adversely impacting sensitive natural and
cultural resources within the Park. These uses need to be substantially reduced for the plan to be consistent with laws and regulations governing California State Park lands.

- Dust, fumes, greenhouse gases are antithetical to stated purpose of the Park

**Declaration of Purpose**

- Do not change the Declaration of Purpose of the original General Plan
- Update the Declaration of Purpose of the Park to reflect all resources in the 25,324 acres that comprise the Park, as the 1982 Management Plan purpose statement pertained to much smaller acreage (i.e., 8,100 acres). The 1994 Desert Protection Act resulted in the transfer of significant public land acreage managed by the BLM to the Park. The purpose statement should include those species of plants and animals that have been listed as threatened or endangered, and/or which are supported by Park habitats.

**Other**

- The draft General Plan should also include an inventory of natural and cultural resources and an assessment of the adequacy of this inventory relative to identifying management issues, resource sensitivity, and public use constraints.
- Old documents show RRCSP was classified as "Special Recreation Area"
- Would like to see consideration of economic impacts of closing routes
- Fencing is unsightly
- Whistler Ridge was named after him
- “This has nothing to do with Onyx” [SVRA]
- Park should be planned within the context of Desert Renewable Energy Conservation Plan and the BLM West Mojave Route Network plans
- Concerns regarding other expenses that would be introduced by the changes proposed by the Concepts – i.e. additional personnel to verify appropriate vehicle licenses, fences needed to protect animals from new trails
- Opposition to SB 767
- Provide a variety of access - foot, bike, limited OHV

**Other Items of Note**

- Email regarding asking for the Primitive Roads Map #17498 and the entire appendix of the 1982 General Plan for RRCSP
- Individual sent a link to an OHV Facebook group discussion
- Individual sent Governor Brown’s biodiversity initiative from Dec 2017
- Professor of Earth Science at University of Southern California included a study on pathways of grass fossils in the Dove Spring formation
- Individual sent a link of Anza Borrego Desert SP General Plan, and a link to PRC 5019.56 regarding definition of SRA. Also submitted a comment letter in opposition to reclassification, no green sticker use, pro-protections