



## Summary of Comments Received in Response to Red Rock Canyon State Park Revised Plan Concept for the General Plan

May 2020

### Introduction

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 its third round of public meetings in Ridgecrest, Lancaster and Bakersfield on October 23, 24, and 25, 2019 to present and obtain feedback on the Revised Plan Concept for the RRCSP General Plan revision. This round of meetings followed up on public meetings in March 2019, where four different preliminary planning concepts were presented for discussion.

At the open-house style meetings in October 2019, the Revised Plan Concept for the General Plan revision was displayed, and feedback was solicited from interested stakeholders and agencies. Attendees visited display stations, reviewed materials on the Revised Plan Concept, spoke with State Parks staff, and provided input. Attendees were provided a blank comment card and an informational packet describing the General Plan revision process as well as the Revised Plan Concept map and description. These materials were also posted on the project website at <https://www.redrockgp.com/public-meetings>.

Comments on the preliminary planning concepts were solicited through December 2019. State Parks accepted comments in person at the public meetings; via mail to California Department of Parks and Recreation, Attn: Katie Metraux, Planning Manager, 1725 23<sup>rd</sup> Street, Suite 200, Sacramento, CA 95816; or via email to [info@redrockgp.com](mailto: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](http://www.redrockgp.com). This information was sent out in an email blast and by U.S. mail if specifically requested.

### Next Steps

State Parks will review and consider all feedback obtained through this set of public meetings and the public comment process. This includes feedback on the Revised Plan Concept, park management, and the overall General Plan revision and planning process. This summary report will be posted on the project website, [www.redrockgp.com](http://www.redrockgp.com).

The next step of the planning process consists of developing the Preliminary General Plan and Draft Environmental Impact Report (EIR), which will be a chapter of the General Plan document. State Parks anticipates that the document will be available for public review in late summer of 2020. The release of the document for public review

and comment will be announced through the State Clearinghouse, through an email blast to all subscribed stakeholders, on the project website, and on the State Parks website. If you have not already signed up to get project updates, please visit [www.redrockgp.com/home](http://www.redrockgp.com/home) and enter your email address under the “Get Updates” section of the home page. State Parks will revise the Preliminary General Plan and prepare a final EIR after we review comments from government agencies and the public. Once completed, the State Park and Recreation Commission will hold a hearing near Red Rock Canyon State Park to review these documents and decide whether to adopt the General Plan and certify the EIR.

### **Summary of Comments**

The following summary describes the comments provided by interested members of the public and by the organizations listed below during the public comment period from October 23, 2019 through December 31, 2019. 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.

A total of 227 comments were received during the public comment period. Organizations that submitted comments included Audubon Kern River Preserve, California Four Wheel Drive Association, California Native Plant Society, California Native Plant Society - Kern Chapter, Center for Biological Diversity, Defenders of Wildlife, Desert Survivors, Desert Tortoise Council, HK Offroad, Kern Audubon Society, Kerncrest Audubon Society, Pacific Crest Trail Association, Public Interest Coalition, Red Rock Canyon Interpretive Association, Sierra Club, Sequoia ForestKeeper, and Stewards of the Sequoia.

# Summary of Revised Plan Comments by Topic

## Declaration of Purpose of RRCSP

State Parks received the following comments regarding the Draft Declaration of Purpose.

- Concerns that the “preserve and protect” language of Declaration of Purpose would cause trail closures.
- Suggestions to add the following text:
  - “The desert plant and animal communities shall also be considered prime resources, particularly the rare, endangered, threatened, and special interest species.”
  - “Prime resources in the unit include the geologic, scenic, and biologic values associated with” California’s State Reptile, Agassiz’s desert tortoise, the endemic Mohave ground squirrel and Red Rock Canyon Tarplant, as well a vast array of migratory birds, night skies and opportunities for quiet recreational solitude.”
  - Add the word “biologic” in the sentence containing “Prime resources in the unit include the geologic, scenic, and biologic values.
  - Add a statement be to ensure that natural resources are given priority in conflicts between natural resources, visitor use, and “non-natural” recreation.

## Terms

A comment was made on the Terms, found on page four of the information packet.

- Prefer “cherry-stemming” trails instead of re-routing them.

## Reclassification of the Northwest Corner to a State Recreation Area (SRA)

### General comments

- Approve Revised Plan Concept; represents a good compromise with the small northern segment going to SRA status.
- Concerns regarding hunting in and out of the new SRA boundary. Concerns regarding the use of dogs with hunting.
- Confusion regarding how the SRA lands north of Sierra View Road would be managed. What is the difference between the Sensitive Resource Management Zone versus Natural and Cultural Preserve versus Proposed Natural Reserve?
- Include the acreage of the proposed SRA.
- How will monitoring and enforcement be implemented to ensure vehicle impacts are not compromising conservation of the natural preserve?
- How would a reclassification to an SRA provide “maximum protection” for the area’s scenic and scientific values?
- Revised Plan Concept is confusing and lacks scientific documentation.

### Concerns about Reclassification

- Presents potential to generate lawsuits and the return of acreage to the federal government.

- Increase the green sticker miles allowed instead of reclassifying part of the park.
- Concerns that reclassification of a portion of park to SRA will set a precedent and result in future changes in classification, which would reduce State Parks' ability to meet its mission to preserve biological diversity and protect resources.
- Reclassification of portion of park to SRA violates Public Law 103-433, Sec. 701, Transfer of Lands to RRCSP, dated October 31, 1994.
- RRCSP does not meet the legal criteria to be a SRA as put forth in Public Resources Code (PRC) Section 5019.56.
- Concerns that reclassification to an SRA would negatively impact RRCSP natural resources, cumulatively with changes in regional protections due to the Federal Administration's revisit of the BLM's adopted Desert Renewable Energy Conservation Plan.
- Inappropriate to propose reclassification as a part of regional planning efforts – General Plan revision should be in the interest of the park only.
- RRCSP should protect its unique geological resources and not allow reclassification to SRA.
- Land proposed for reclassification to SRA is rich in significant cultural properties; meetings with Native American Elders showed the land is culturally important to Native communities.
- Does not meet statutory criteria for SRA being "terrain capable of withstanding extensive human impact."
- Designation would degrade natural resources, and increase air pollution and greenhouse gasses.
- Conversion of area to SRA is not justifiable. Need for OHV recreation is not greater than the need for conservation.
- This proposed SRA is territory of California Environmentally Sensitive Area for the threatened Mojave Ground Squirrel and Agassizi's desert tortoise.

### **Support for Increased OHV Access**

- Over 100 comments were received requesting to keep Last Chance Canyon open through Cudahy Camp and Graduation Hill, and to open Nightmare Gulch to four-wheel drive vehicles.
- Existing motorized routes must be kept open to be consistent with Declaration of Purpose to preserve opportunities for future generations.
- Concerns regarding negative economic impacts of closing routes to historic motorized use?
- Red Rock's unique geological formations provide a dynamic landscape for OHV users.
- Suggestions that State Parks use volunteers to help with trail restoration
- OHV access is necessary for elderly and disabled people to access and enjoy the park.
- Closures affect youth access to OHV recreation.

- Fences have already been put in place.
- Limited Use Management Zones should include motorized vehicle usage on specific routes.
- Bridges or a bypass route should be considered to provide access through areas currently fenced off to avoid traffic impacts.
- Requests for information on number of park users, such as hikers, OHV users, etc. Closures are due to concerns of environmental stakeholders who do not actually access the areas that are closed off.
- OHV Clubs and organizations are available for adopt-a-trail events to help maintain the area.

### **Support for Restriction of OHV Access**

- The 1994 California Desert Protection Act (CDPA) is intended to increase protections of resources.
- Retention of green-sticker access in the park would constitute an “improvement” as defined by PRC Section 5019.23, and would increase congestion and parking issues and negative impacts to resources.
- RRCSP is the only place or one of few locations where passive forms of recreation can be enjoyed without the threat of OHV noise and dust. OHVs impose on quiet experience of the park.
- Opposition to all motorized vehicles on all park roads except in campground and parking lots .
- Plentiful other opportunities for OHV recreation exist nearby.
- Opposition to expanded OHV access; particularly the green sticker OHV access along the desert wash (northern section of Abbott Drive).
- Support for Revised Plan Concept’s reduction of green sticker routes.
- Green sticker vehicles should be required to bring vehicles in and out on toy “haulers”.
- Treat RRCSP the same manner as Anza Borrego with no OHV access, for enjoying nature only.
- Concerns regarding spread of Valley Fever due to increase in dust from OHV use.
- Concerns regarding impacts to cultural and natural resources include:
  - Soil compaction.
  - Erosion/dust/exhaust negatively affects other visitors.
  - Noise pollution negatively affects other visitors.
- OHV use throughout the park, the proposed Opal Rock Primitive Camping, and proposed Sierra View Primitive Camping would all invite wildfires, damage critical habitat, and encourage illegal trespassing.
- Any level of green sticker access is incompatible with a natural resource protection.

- State Parks does not have the necessary funds to properly patrol and enforce against OHV trespassing.
- Concerns about OHVs driving on Red Rock Inyokern Road and increasing the need for maintenance; maintenance cost concerns on a county road.
- Planning team should examine Michael Sampson's 2006 OHV effects study supporting the elimination of green sticker access throughout the entire park.

## Routes

### General Comments

- Alternative routes could be extending BLM SB 195 and SB 82.
- Opposition to trail from Hagen Canyon to Ricardo Campground – would cause damage to loose north canyon wall and increase foot traffic through the wash and adjacent mudstone banks.
- Opposition to trail through Hagen Canyon – potential damage to unique terrain from installation of the trail would attract “less diligent” users.
- Suggest the final plan be modified to reflect continued use of a designated motorized trail system within RRCSP that interfaces with adjoining motorized routes on neighboring public lands.
- Provide for a designated system of well-marked routes will enhance the visitor experience for all visitors
- Eliminate vehicle access to Red Rock Wash Road.
- Instead of converting the area north of Sierra View Road to an SRA, suggest establishing a Visitor Center along the east side of Hwy 14 north of RRCSP, and let OHVs find the best-established route into Onyx and Dove Springs, to the west, and away from the Wilderness Area to the east; then limit them to this route.
- Suggest a new green sticker trail from Hwy 14 east to Sierra View Road along the northern park border

### Sierra View Road

- Opposition to allowing green sticker vehicles to drive on Sierra View Road.
- Concept Map states “Sierra View is the only primitive route that would allow green sticker vehicles.” But, the map indicates green stickers allowed on the route connecting Dove Canyon to the park Sierra View Road appears on the Concept Map to be outside of the SRA.
- Redundancy for unpaved primitive routes (e.g. four in the Proposed Natural Area north of Sierra View Road seems excessive).
- Prefer to have Sierra View Road be a non-green sticker route. If this does not happen, route should be fenced on the north and south sides to minimize traveling off the route.
- Concerns about proposed SRA along Sierra View Road affecting the proposed Natural Preserve.

## Last Chance Canyon and Cudahy Camp

- Create vehicle access roads with parking lots to allow pedestrian access only to Last Chance Canyon.
- Keep vehicle access open to Last Chance Canyon and work with an OHV organization to come to a compromise on its use.
- Lower Last Chance is an important playground for many people; keep the access to upper canyon open through Cudahy and other trail areas. Most people would go on to Bickel, or EP-15 along all the BLM land, as that is much more interesting.
- There is nothing desirable to hike through in the Last Chance Canyon area.
- More specific information is needed about the resources in need of protection.
- Continue to manage Last Chance Canyon as a motorized route. Closing the upper end of this route will create traffic management issues and trail proliferation.
- Last Chance and Graduation Hill are good areas to introduce new four-wheel drive enthusiasts.
- Confirm continuation of standing road easement with small miners.
- The three routes that cherry stem into the Cudahy natural area should end at the boundary of the natural area.
- Cudahy Camp has a prehistoric component in addition to historic mining. This site has potential for buried prehistoric cultural component.
- Last Chance Canyon was likely a corridor used by prehistoric people traveling from the quarry areas in the park to Koehn Lake and further south.
- Increases in streambed impacts have been observed in recent years in Last Chance Canyon and Nightmare Gulch.
- Enforcement concerns related to terminating three non-connecting vehicle routes at Cudahy Camp.

## El Paso Mountains

- Need to maintain connection to the El Paso Mountains specifically. Last Chance Canyon route is primary entry and exit into the El Paso mountains.
- Maintain access through the rest of El Paso if Last Chance Canyon road cannot go through Cudahy anymore.
- Access to lands in the El Paso, Spangler, Red Rock area affects businesses.
- Disappointment about no access to basin below Cudahy Mines.

## Nightmare Gulch

- Under the State Parks Forward Initiative and Transformation Program, State Parks is supposed to increase public access. Closing motorized routes such as Nightmare Gulch would be contrary to these initiatives.
- Nightmare Gulch was an established vehicular route of travel when the property was transferred from BLM. Claims of archeological sites are absurd.
- Support continued Nightmare Gulch closure to vehicles.

- Is it necessary to move the trailhead for Nightmare Gulch? The current fence and parking area are good; is it possible to improve it where it currently exists instead?

#### Dove Springs

- Opposed to allowing green sticker vehicles between Dove Springs and the visitor center.
- Preserve access to Dove Springs.

#### Dixie Wash Connector Route

- Include an analysis of alternatives to provide east to west connectivity on the BLM lands -- connector can be established following the Dixie Wash channel. Benefits of a Dixie Wash connector route include:
  - 2-lane crossing of Hwy 14.
  - Caltrans has plans to expand that portion of Hwy 14, and should build an undercrossing.
  - Provides benefit to campsite access along EP15.
  - Dixie Wash route would not require a California Driver's License and would serve entire families of OHV users.
- Area to be classified as an SRA cuts through culturally and naturally important land – this should occur at the area 5 miles north of the park on Highway 14 at Dixie Wash (SC65). It is accessible from Dove Springs via Aqueduct Road or Power Line Road on the west, and would connect riders to Hard Road on the east side should a safe crossing of Hwy 14 be established.

### Natural and Cultural Resources

#### General Comments

- The Revised Plan Concept protects significant natural and cultural resources while still allowing the public to experience them.
- General Plan Revision should explicitly exclude grazing in the park to avoid damage to habitat.
- Insufficiency of released biological summary
  - Summary relied too heavily on formal listing of biological species.
  - Oversight of Small Miner Snail, Mimic Shoulderband Snail, Martini's Moth, Parched Fringe-toed Scorpion, Sunbather Moth, Cooper's Hawk, Sharp-shinned Hawk, Northern Harrier, Pallid Bat, Townsend's Big-eared Bat, Spotted Bat, Hoary Bat, Little Brown Bat, American Badger.
  - Update the resource summary to reflect current resource values, status, and trends.
  - Prime resources should include endemic and rare plants listed in California Natural Diversity Data Base, Sensitive Natural Communities listed by California Department of Fish and Wildlife
- Suggestion of further archeological, biological, and geological surveys.

- Retain access through most of the Cudahy Creek drainage. Retaining 90% of roads within Cudahy Creek drainage will impact Red Rock Tarplant and Red Rock Canyon Monkeyflower.
- Revised Plan Concept would be a great improvement over existing conditions, protecting cultural, geologic and natural features.
- How will recreational vehicle use and natural resource condition be monitored?
- How will impacts from vehicles be addressed, future impacts prevented, and damaged areas be restored?
- Increases in development and recreational use of the region around RRCSP are a cause for management and protection of sensitive species.
- Organizations can provide volunteer assistance with surveys.
- Declining populations of desert tortoise, Joshua trees, and winterfat (*Krascheninnikovia lanata*) exist north of Sierra View Road.
- Changes in management should be informed by surveys that rule out presence of sensitive resources.

### Botanical

- The General Plan must reflect the botanical significance of the park.
- Contains endemic species (Red Rock tarplant, Red Rock Canyon monkeyflower *Erythranthe rhodopetra*); discovery of new species.
- A comprehensive inventory of RRCSP's botanical resources is necessary. Baseline, association-level vegetation surveys needed of the entire park. Map of all invasive plants and a plan for management. Need an annotated checklist of flora.
- General Plan should highlight the park's role as a location for the appreciation of California's flora.
- Plan for how the park will respond and adapt to climate change.
- General Plan should highlight conservation value of RRCSP primarily due to endemic plant species.
- Area around Donley Road in the southwest end of the park has rare and endangered plants.
- Concerned about Red Rock tarplant and Red Rock Canyon monkeyflower rare plants and potential impacts on these species from OHV use.
- Incorporate management of invasive plants into plan.
- Perform regular vegetation surveys.

### Birds and Wildlife

- Land east of Hwy 14 should continue to be closed during nesting season for prairie falcons and other raptors.
- eBird data has recorded Prairie Falcon in Old Dutch Cleanser Mine and Ricardo campground during breeding season; Revised Plan Concept only identifies one Prairie Falcon territory for seasonal closure.

- OHVs degrade habitat and are antithetical to birding. Migratory birds come to RRCSP, which will be one of the only protected areas left for migratory birds with solar and wind farm development in surrounding area.

### Natural and Cultural Preserves and Management Zones

- Planning team should consider establishing Cultural Preserves throughout large areas of the park.
- Support expanded Sensitive Resource Zone, Natural Preserve at Last Chance Canyon, and Cultural Preserve in Red Buttes.
- Move boundary of Limited Use Management Area to include Opal Canyon opal deposits and permit surface disturbance with hand tools (allow 100 pounds per day of host rock).
- Situating a State Preserve next to an SRA is incompatible.
- Support the identification of management zones and preserves, but these types of land use designations should be based on existing underlying data sets, which should be completed and released to the public, including an inventory of features, basis for the proposed boundaries, acres of proposed zones and preserves.
- Support for Expanded Sensitive Resource Zone, Natural Preserve at Last Chance Canyon Riparian, and Cultural Preserve in Red Buttes.
- Boundaries of Hagen Canyon Natural Preserve should be revisited – round out jagged corners of boundary. Expand Hagen Canyon Natural Preserve further west and north to capture paleontological and archaeological sites.
- Revisit boundaries of Red Cliffs Natural Preserve.
- Designated management zones should have boundaries that follow physical features such as roads or passes.
- Expand focused use zone at Red Cliffs Preserve.
- Enact an Iron Canyon Cultural Preserve.
- Landscape where Dry Placer Gold Mining Technology was employed should be protected under a new “Iron Canyon Cultural Preserve.”
- Restrictive new access rules for Natural Preserves will negatively impact visitor experience. Restricting visitors to stay on trails excludes them from interacting with cliffs; need to ensure that retention of historic open on-foot access is preserved.
- How will law enforcement manage vehicles on two cherry stems through the new preserve/will there be increased enforcement?
- Request more of the park designated as Natural Preserve Management Zones.
- Map of the Revised Plan Concept is misleading with the hatched pattern representing the SRA is hidden beneath the dark green representing the Natural Preserve area.

## Park Facilities

These facilities include campgrounds, visitor centers, interpretive panels, restrooms, offices, buildings, and other park infrastructure.

### Ricardo Campground

- Improve water sources at the Ricardo Campground Trailhead leaving RRCSP.
- Ricardo Campground improvements should be addressed (bathroom, water pump, overcrowding, no ranger presence).
- Concern that OHV access trail into Ricardo Campground from the north affects peaceful experience of the park; propose speed and noise limits on a trial basis.
- If green sticker access remains, will there be designated quiet time for the campground?
- Opposition to allowing green sticker vehicles between Ricardo Campground and Onyx SVRA.
- Increases in noise and dust pollution attributed to OHV and equestrians at Ricardo Campground.

### Shared Park Operations Center with RRCSP and Onyx SVRA

- Opposition to shared Visitor Center potential conflicts between users and user interests outweigh efficiencies; will create parking and congestion problems.
- Because Onyx SVRA is focused on motorized recreation, and RRCSP is focused on conservation of irreplaceable resources, a joint facility would not meet the needs of the two very different units, and the operations hub should be developed in the Onyx SVRA.
- Jawbone Station already exists and improving that center would be a better alternative.
- Priority for the Visitor Center should be interpretation of natural resources, not OHV.
- State Parks does not propose to alter the Driver's License requirement, therefore shared Visitor's Center would not serve all Onyx SVRA customers.
- Where will the exhibits go? Shared use will necessitate destroying tens of thousands of dollars of existing exhibits created by RRCIA and confuse the role of RRCIA.
- Shared Visitor's Center and Join Onyx/Red Rock Operations Hub will disrupt visitor experience; would require park staff to focus on enforcement instead of other administrative issues.
- Suggest retaining current location of the Visitor's Center and move Rangers and RRCIA offices to unused residences adjacent to the Visitor's Center.
- Visitor's Center should be focused on education, research, and not recreation; overall operations have shifted their focus to recreation which impacts visitors.
- What function will the Red Rock Canyon Interpretive Association have with the combined facility?

## Other Facilities

- Suggest establishing a Pleasant Canyon welcome point.
- Placing a visitor center in view of Hwy 14 would ruin undisturbed view of the landscape.
- Be careful about placing interpretive signs and picnic tables at Cudahy Camp canyon bottom. Consider placement of filter fabric upon the site surface overlain with a thin layer of highly crushed gravel prior to placement of tables and signage.

## Primitive Campgrounds

- Campgrounds should not allow vehicles and recreational vehicles other than motor homes.
- How will trash, human feces, and fires in primitive camps be managed?
- There are already many campgrounds in the area.
- Suggest Environmental Camp (provided map), propose opening Black Rock Canyon Road at Hwy 14 and terminate at the waterfall head (provided map).

## Equestrian Access

- Support for camping and staging areas for equestrians.
- Tie rails or containment would be nice.
- Sites along lower Last Chance Canyon are good for “mechanical travelers” and equestrians to stage or camp.
- Unclear if equestrian use is being proposed on new trails.
- Equestrian traffic should be eliminated from Nightmare Gulch to protect the fragile creek bed.
- Joshua East Road should become a hiking/equestrian trail as Joshua West Road provides access to the north and south limits.
- Joshua East Road and Tufa Point Road should be non-motorized trails because traffic noise is disturbing to park users. It would increase pedestrian and equestrian opportunities in this area.
- How will equestrians access Nightmare Gulch without improvements to the trail?
- How will vehicles with horse trailers access the proposed Sierra View primitive camping area and the proposed Cudahy Camp without improved roads?
- Support for primitive camping and equestrian access.
- Important to make sure horse trails remain safe for use.
- Are there enough equestrians in the park to warrant the amount of increased opportunities?
- Ensure access roads to the areas planned for trailers and horse camping are accessible to trailers.
- Equestrian staging in Birds of Prey Natural Preserve will degrade “natural” qualities of the area.
- Appreciation for additional equestrian staging areas and horse camping areas.

- Request for primitive dry horse camping or horse camping with horse stalls; request to be able to enter on Last Chance Canyon road.
- Acknowledge danger of riding horses in the same area as green sticker vehicles.
- Would like to see all trails and trailheads open to equestrian use be built to equestrian standards – especially a potential PCT connector trail and its associated facilities. Recommend using the *Equestrian Design Guidebook For Trails, Trailheads, And Campgrounds*, written by the USDA Forest Service and Federal Highway Administration.

### Other Non-Motorized Recreation

- Placement of certain non-motorized trails appears to not acknowledge physical realities of the landscape – e.g. trail connecting Hagen Canyon Natural Trail and Desert View Natural Trail does not recognize they are separated by a 300-foot cliff.
- Support for maintaining opportunities for rockhounding.
- Concerns about closing areas to hikers; foot travel does not cause damage. Accessibility by foot is key to the experience of the park.
- Opposition to restricting pedestrian access to established trails. Footprints don't harm the environment.
- Current maintained trail system is inadequate to support enjoyment of the cliffs and unique formations. Explicitly permit off-trail hiking per 14 CCR § 4325.
- Concerns about OHV riders illegally accessing the proposed connection to the Pacific Crest Trail (PCT).
- Build a water source where the PCT connector trail intersects with the its main body.
- Support establishing a non-motorized trail connecting to PCT.
- Concern the PCT connector trail could invite motorized users; to avoid this, suggest that the connector trail be only foot and stock travel; involve PCTA staff in planning; and increase enforcement and patrol of the area.

### General Comments

- Access road to cliffs near former petrified forest was not included on Existing Conditions or Revised Plan Concept map.
- Add reference to serving the Scout community.
- Arrow on the Concept Map to the “Proposed State Recreation Area” box originates at Red Rock Inyokern Road, which could be mistaken to allow green-sticker OHVs.
- Concern regarding the 2017 revision of CCR Section 4325 that limits pedestrian-only access to trails. Support including a provision for access into the General Plan.
- RRCSP's isolation from human activity is its most valuable asset.
- The park's intrinsic focus on conservation should eliminate any further development within the State Park via the General Plan update.

- RRCSP is not responsible for addressing issues with Onyx SVRA.
- State Parks should evaluate reduction in impacts associated with variable levels of restriction of OHV use.
- Revised Plan Concept does not explain how reduction of the park is in the best interest of RRCSP.
- Comments from letter in April 2019 need to be addressed in environmental documentation to show that recreational opportunities have increased on nearby BLM lands.
- An EIR must be prepared and the public must have the opportunity to comment.
- Environmental document should consider:
  - Impacts of changed SRA classification.
  - Increases in recreational uses and camping.
  - Include in environmental analysis that indirect impacts of road can extend beyond the edge of the road, to natural resources including Agassiz's desert tortoise.
  - Add BLM decision to allow unrestricted recreational uses on Cuddeback and Coyote dry lakes and to allow competitive motorcycle events in the Ord-Rodman desert tortoise critical habitat area to the list of projects included in cumulative environmental analysis.
  - The EIR must include an alternative that preserves all historic motorized routes, opens more routes, opens motorized access to Dove Springs, restores Nightmare Gulch for motorized use, and take into consideration the increase in motorized usage since 1982.
- Anza Borrego's General Plan should be used as a model for the RRCSP General Plan Revision.
- Appropriate signage of roads will be necessary; green sticker access should be eliminated, but at the very least fenced. Law enforcement needs to be present on high use days.
- Revised Plan Concept does not provide sufficient enforcement – recommend controlled entry points where entry fee is required to reduce damage to the park
- Revised Plan Concept lacks the “purpose for increasing recreation...instead of concentrating usage to a smaller footprint to preserve resources.”
- Recommend Preliminary Concept #4 to be adopted as the preferred alternative.
- Concerns about environmental impacts from increased tourism – suggest regulating number of tourists, offering shuttle service, limiting air tours, promoting “take in, take out” policy, educating public about leave-no-trace ethics, increasing enforcement.
- Request State Parks provide underlying data justifying route closures and documentation of potential mitigation measures.

#### Plan Process

- Notice of Preparation (NOP) never contemplated reclassification of the State Park to some other status; new scoping needs to be initiated.

- The State Parks preliminary four non-motorized concepts and revised single non-motorized concept are a flawed process. State Parks must develop a wide range of alternatives during the EIR process including an alternative keeping all existing motorized routes open, as well an alternative for adding motorized routes as requested in public scoping comments.
- What was the reason for the previous comment period extension?
- Resubmitted the comments from the previous comment period in support of Concept #1.
- Public comment process is “smoke and mirrors.”
- A conflict of interest exists with having staff in charge of OHV facilitate this process.
- The outreach and public comment process has been flawed; comments have not been considered, oversight from external agencies is needed.
- Concerns that the Route Story Map Tool is inaccurate and distorts historical context of closures – better maps are available (BLM 1985/87 route designations)