



Comment Letter regarding the General Plan Revision for Red Rock Canyon State Park (RRCSP, or Red Rock)

Submitted by Red Rock Canyon Interpretive Association

November 9, 2018

I. The Uniqueness and Importance of Red Rock Canyon State Park's Existing Condition

Red Rock Canyon State Park is a spectacular unique landscape in the State of California. Red Rock is one of the largest parks with over 25,000 acres, as well as one of the most densely packed resource-rich parks in the entire California State Park system. It is a treasure that should be afforded the protection and care that it's plethora of valuable resources deserve in a time when open space is being reduced and devoted to recreation and human pleasure rather than focusing on the larger responsibility we have to the natural world. Red Rock Canyon is a legacy that California State Parks has the honor and privilege of protecting so that it's educational; scientific; interpretive and enjoyment can be carried on for future generations.

Red Rock has a spectacular record of fossil beds that have been the focal point of study and work of paleontologists for over a century. The delicate desert environment allows for the exposure of fossils in plain sight which has been a very important tool for the scientific work that has been done at the park. The Natural History Museum of Los Angeles County has had a very strong affiliation with Red Rock Canyon State Park for decades, which was originally led by the work of esteemed paleontologist, Dr. David Whistler. The Natural History Museum of Los Angeles County (LACM) even has a small section at the museum in L.A. depicting and explaining how the climate of Red Rock Canyon in pre-historic times was of a temperate landscape. The number of important discoveries at the park include fossils of the elephant-like gomphotheres; oreodonts; ancient horses, camels and rhinoceros; a relative of a large saber tooth cat; the most ancient New World relative of modern-day skunks as well as an enormous collection of micro-fossils. These important fossil finds and



contributions to the scientific community can only flourish in an environment where the land is respected and protected from careless human destruction. The fossil exploration at Red Rock was omni-present during Dr. Whistler's tenure at LACM, including numerous field trips to the park. Dr. Whistler's, successor, Xiaoming Wang, is involved in a number of research projects that are slated in the coming years to be held at Red Rock with the understanding that State Parks is the steward of protecting this treasured landscape and the largely unexplored yet to be discovered scientific riches that remain delicately hidden just under the surface of the desert landscape in the park.

Red Rock has had a profound impact not only on scientists but on educators throughout the state of California and beyond. The unique geological formations found in the park have made Red Rock an outdoor classroom for geology students that come for field trips from universities; higher education venues; high schools; middle schools and grammar schools though out the region. The enormous array of geological features including badlands; buttes and canyons are emphasized through the array of colors one would find in a "painted desert." The sedimentary rock sequences throughout the park are punctuated by volcanic deposits that were the result of massive volcanic eruptions. The teaching opportunities that abound for teachers of earth science can range from basics like an understanding of earthquake zones as Red Rock sits at the precipice of the famous Garlock Fault to specialized study of rocks and minerals such as zeolites.

II. Current Compatible Uses within RRCSP

Red Rock has attracted both experts and passionate amateurs in the realm of astronomy. Red Rock has extraordinary dark skies. On the Bortle Scale used around the globe that goes from 1 to 9 with one being the darkest sky and 9 the most light polluted, Red Rock is slated at an amazing 1 to 2. Astronomy groups from all over the region flock to Red Rock to witness and document the night sky. Light pollution has plagued a significant portion of the world and so it is an unusual opportunity for amateur astronomers and the public to view the expanse of the galaxy with the naked eye at Red Rock. Red Rock Canyon has been sited as having a night sky that is of "exceptional" quality as a resource for night viewing. It is our hope that the park administrators will recognize this world-class resource as yet another element of Red Rock Canyon State Park that needs to be protected for humankind.

Photography is another area of Red Rock Canyon State Park that has captured the attention of photographers capturing the night sky as well as photographers;



videographers and filmmakers who use Red Rock as their canvas or backdrop for a wide array of creative endeavors. The spectacular and majestic backdrop of the geological formations with the vivid colors of the desert background make for a perfect venue for the camera. The lack of light pollution in the night sky and the lack of air pollution during the day keep Red Rock as one of the few pristine natural environments that can be photographed in its primitive state.

Red Rock has had a strong history of filmmakers coming to the park to film and video hundreds of projects including Westerns; Sci-Fi episodes; television shows; commercials; music videos and popular movies including parts of Jurassic Park and Disney's "Holes." The pristine desert environment with the amazing landscape is a perfect backdrop for storytelling, mind you that the films and videos and commercial photography shoots are enabled by the ability to curb human traffic both visually and with minimal noise disruption in the background. Red Rock has a strong relationship with movies; commercials; print magazines and videographers and we expect that the stunning scenery will continue to draw this industry for decades to come as long as the integrity of the natural beauty of the park is maintained.

The desert environment offers a place of solitude and reflection for the public and visitors that is difficult to find in urban locales as well as the spreading suburbs. Red Rock is a refuge for those in urban and suburban areas who do not have the opportunity to frequent large natural landscapes such as exists at Red Rock. The desert is a sacred site for many. The Native American history of the park is known to the archaeologists in the State Park system and is understood by tribes around California. It is known to the Native American Heritage Commission as well as the Department of Parks and Recreation in California that locations in Red Rock Canyon State Park are sites of importance to the heritage of Native Americans and as such deserve to be protected and respected as sacred. Ceremony at Red Rock was not only part of the ancestral heritage of the park but continues to this day.

Red Rock Canyon State Park has long been known to give health back to those who come and visit, be it mental or spiritual health or physical. Red Rock has been the destination for myriad school groups over the years as well as a retreat for innumerable boy scout/girl scout and other children's and youth groups. There are hiking groups that get enormous benefit from the ability to get physical activity in this beautiful desert landscape that is fulfilling beyond what it gives to the body. There are numerous other recreational activities that leave a minimal input on the parks resources that are of benefit to the public such as the equestrians and orienteering groups who frequent the park. There has also been a history of allowing hikers on foot to explore beyond the trails creating a world of adventure which is what makes Red Rock stand out from other parks. We understand that when one walks free in the desert one feels the expansion of



freedom within, in a manner that cannot be articulated but can be only be felt or experienced inside. We hope to have a number of trail expansions that will be for foot traffic as have been suggested and drafted by previous park employees and staff who spent copious amount of time researching possible future trails. We also hope to have expanded group campsites as existed previously in other areas of the park to the East of Highway 14.

III. The Need to Protect RRCSP's Natural and Cultural Resources

Maintaining the integrity of the natural viewshed surrounding and making up Red Rock Canyon State Park should be one of the highest priorities of State Park as its steward. The attraction to Red Rock is the majestic desert expanse with natural formations that are pristine in appearance. Nature untouched draws visitors from near and far as the world becomes more populated and open space is more and more of a precious commodity. Red Rock Canyon stands juxtaposed to the scarred hillsides of nearby OHV parks whose top soil has been disturbed and rutted out as a matter of routine. People do not go to OHV parks for their physical beauty, but they do come to Red Rock to appreciate the splendid topography, landscape and viewshed. The calling card of Red Rock is this tremendous natural beauty that State Parks should uphold as one of the locales in the California desert that is recognized for its physical magnificence.

Too often people don't understand the abundance of life that is in the desert. It is there but it is often hidden. Because of the temperature extremes there is a nocturnal life that takes place as both plants and animals have adapted to life in the desert. Life is often teeming underground or in caves or inside plants. The number of endangered species is often higher in the desert because it is more difficult to survive with harsh conditions. The extraordinary effort put forth by those plants and animals who live in the desert speaks of an energy that should be appreciated and upheld. Red Rock Canyon State Park is honored to have birds of prey nesting at the park. Golden Eagles who reside in the park have acute senses and their survival and well-being depends on their protection from outside influences. Red Rock Canyon provides the only extensive protected lands in the area for many covered species including Agassiz's desert tortoise, Mojave ground squirrel, pallid bats, Townshend's big-eared bat, Mojave fringe-toed lizard, burrowing owl, Swainson's hawk, and golden eagles. Species of special concern that occur in the park include long-eared owls, northern harriers and prairie falcons. In all 16-bat species are found in the park as are badgers and



mountain lions. Wildlife including the Mojave ground squirrel, the Desert Tortoise, the Desert Kit Fox and Burrowing Owl are other species many of whom have special-status as endangered and threatened species that reside in the park. The Endangered Species Act of 1973 protects the Desert Tortoise which we are honored to have in the park. A desert tortoise hatchling was found in the area of Last Chance Canyon giving hope that this species can find refuge at Red Rock if measures to protect it are enforced in the park.

There is a fragility in the desert of both plants and animals and maintaining their habitat is essential to their survival. A comprehensive inventory of resources found at Red Rock Canyon State Park can be referenced in the document compiled by Mark Faull who did extensive research during his tenure with State Parks while stationed at Red Rock Canyon State Park. (https://www.parks.ca.gov/pages/21299/files/res_inv_summary.pdf). Red Rock is home to numerous desert plants and flora that are an essential aspect of the desert eco-system. Red Rock Canyon contains numerous unique plants that are of tremendous importance to botanists. The resiliency of plants that thrive in the desert such as the Joshua tree and creosote are emblematic of the brilliance of adaptation. They abound in the desert landscape but there are also unique rare plants like the Red Rock Tarplant that is endemic to the area.

If it is State Park's directive to protect and conserve, then the Department has to be especially vigilant in their duty in an environment where life is so fragile and precarious. It is State Park's obligation to determine those activities that will result in negative significant impacts, and to mitigate any threatening activity that has too large a hand at destroying the resources that make up the web of life in the desert. It is important to keep foremost in mind as this General Planning Process for Red Rock Canyon State Park proceeds, that the California Desert Protection Act of 1994, which includes Red Rock Canyon State Park, provides for the "maximum protection for the area's scenic and scientific values." It is extremely significant that the most recent enactment of the Desert Renewable Energy Conservation Plan (DRECP) which focuses on the land around Red Rock, puts tremendous emphasis on the importance of conservation on public lands in the desert. In this spirit, it is in keeping with this precedent that State Parks should follow through with a congruent management plan that is in lock step with this over-arching focus on preservation and conservation of desert terrain.

The desert environment takes longer to heal when the soil is disturbed and can sometime remain with visible disturbances in sight for years. This disturbance can alter the cycle of life in the desert that involves multiple life forms including



both vegetation and wildlife. The Governor of the State of California is acknowledging the importance of biodiversity (<https://www.cnps.org/conservation/the-governors-biodiversity-initiative-important-takeaways-12537>) and it would follow that State Parks would try to be cognizant of the connectivity involved with eco-systems when determining management policy. Climate change is something that California State Parks needs to be not only aware of but taken into great consideration when deciding on the management vision and implementation in a park with a desert environment such as Red Rock.

Red Rock Canyon Interpretive Association feels that every effort needs to be made to protect the fragile desert environment within RRCSP. Offenders causing significant negative impacts to resources by destroying life in the desert even if it is not their intention, need to be removed from the equation and not just mitigated. It does no help in the grand scheme, nor it is the intention of CEQA to mitigate for the loss of a rare flower or an endangered species if they no longer exist due to the careless or reckless behavior of individuals recreating in the park.

Vehicles in the desert have become an over-riding concern at Red Rock Canyon State Park. The use of off-highway vehicles in the park has been a problem for visitors; park staff; plants and animals and other historical artifacts and cultural history and sacred sites for decades. Although it may only be a small amount of OHV riders that are disrespectful of the rules and regulations at the park, they do an enormous amount of damage that cannot be mitigated by putting up even more signs or doing restoration projects for something that takes decades to grow or because it is of extreme sensitive cultural or historical significance is priceless and or sacred. Red Rock Canyon Interpretive Association asks that California State Parks treats our unique and extremely fragile desert environment at Red Rock Canyon State Park which has an incredibly plentiful pool of valuable resources in a small or concentrated area of land when compared to a state park such as like Anza Borrego, be treated with the same respect that Anza Borrego carries.

We understand that the park is very large and that many park users can only access the park through the use of roads. We also endorse public safety within the park pursuant to the use of vehicles by park staff and other safety officials to access more distant or remote locations. Red Rock Canyon Interpretive Association is emphatically suggesting that Red Rock follow the same formula as Anza Borrego of only having street legal plated vehicles operate in the park. By only allowing vehicles that are plated in the park, it would allow park visitors to enjoy the park without the destructive element that has been caused by a small portion of the user community. There should be a clear designation of access routes throughout all portions of the park to prevent vehicles from entering



sensitive areas. Non-designated routes such as tracks created by OHV's or 4WD vehicles should be properly signed or fenced to prevent illegal use.

The OHV community has access to multiple locations near Red Rock. There are OHV riding opportunities directly to the South; the West and the North. It is unimaginable that the OHV rider cannot find ample places for recreation without having to destroy the habitat; plants; animals and the peace of the other park visitors. It is a well-documented scenario that when OHV use is allowed a certain percentage of users have consistently over the course of the history of the park (from 1970 to the present) refused to comply with park regulations resulting in documented degradation. Despite 48 years of very prominent and visible park signage, Ranger presence, public education, map provision and even when necessary citations, damaging misuse has continued up to the present resulting in new necessitated closures. Parks has a duty to uphold to the public to protect and conserve the land that they have been entrusted with as stewards. In determining the importance of providing recreational opportunities to different park users, we would say that State Parks needs to understand that not all users are compatible. We feel that OHV recreational riding in Red Rock Canyon State Park is a conflict of interests from the State parks missive to protect and conserve the land. Too often individuals and user groups who are at odds with the conservation side of the balance of scales hones in on their individual rights. There is also such a thing is responsibility for the greater whole. It is a park's missive to holistically look at the greater good a designated land provides to the public rather than a myopic focus of a specific user group.

We also want to acknowledge that OHV has been allowed at Red Rock for some time, however, this history does not automatically entitle that small user group that has the most destructive effect on the park to stay in that same dynamic. A General Plan is for defining the management of the park. State Parks can turn around and remove OHV use from Red Rock. Just because something has been around for a while does not mean it is afforded the luxury of staying, especially if it's at odds with every other aspect of the treasure trove of unique resources that encompass most of the park. It is the obligation of State Parks to measure and weigh the importance of each unique aspect of the park. There are plenty of locations for OHV riders to recreate in East Kern, but there are rare opportunities for the golden eagle to nest; or for paleontologists to discover the pre-historic remains that are to be found in Red Rock Canyon.

Red Rock Canyon has undergone a series of twists and turns in the planning process. Its classification has changed since the land was entrusted to State Parks from "state recreation area" to "state park" before the first general plan was established in 1980 keeping with the original intention "to keep Red Rock Canyon in its natural state as much as possible." Red Rock Canyon Interpretive Association believes that there are a number of values held in this initial plan in



1982 that heralded the wisdom of those who recognized the preciousness of the park. RRCIA would suggest that the current planning team review this well-conceived document for those aspects of planning that would still be applicable three and a half decades later now that parks is embarking on a revision of this plan due to the Last Chance acquisition and other changes that have taken place over the decades.

Red Rock Canyon Interpretive Association is suggesting that the focus of Red Rock Canyon State Park be on education and science as it lends itself to be one of the most magnificent focal points for discovery in the California State Park system for numerous disciplines. It is our hope that one day Red Rock will have a formal center for classes, workshops and field trips and will be the nexus for researchers as is becoming of a park that is so dense with opportunities in archaeology; paleontology; flora; fauna and geology just to name a few. It is our hope that Red Rock will have an international dark sky designation that allows astronomers from around the world to view the universe around us.

Red Rock is a treasure for those who like to relax while camping and enjoy the outdoors as well as those who like to explore. The plethora of cultural history dates back to 10,000 years ago, with more recent artifacts collected including those of the miners who resided at Red Rock during the 1890s Gold Rush years. The cultural history to be found at Red Rock is an awesome asset for living Native American Cultures who connect with their ancestral heritage as well as historians and descendants of the Gold-Rush miners and pioneers as well as archaeologists; teachers and students of the past.

IV. Extension and Addition of Cultural and Natural Preserves

Due to the tremendous number of unique sensitive and special valuable historical and natural resources within Red Rock Canyon State Park, RRCIA, is proposing that the park be protected by the addition and extension of a number of Cultural and Natural Preserves. The list of proposed preserves is below. A map accompanying this submission shows the proposed location of the additions to existing preserves and suggested preserves. Rarely will the California Department of Parks and Recreation have the opportunity to create; steward, protect and promote such an enormous variety of rich resources all housed in a relatively small geographical area in close proximity at a State-owned land designation. It is privilege to have the stewardship of Red Rock Canyon State Park under the wing of the State of California. It is our hope that the Department of Parks and Recreation will recognize this honor and will enact proposals to protect these precious resources for generations to come.



- Hagen Canyon Natural Preserve (extension of existing preserve)
- Red Cliffs Natural Preserve (slight extension of existing preserve near Tufa Point Road)
- Scenic Canyon/Nightmare Gulch Natural Preserve (new preserve)
- Last Chance Canyon Natural Preserve (new preserve)
- Last Chance Canyon Cultural Preserve (new preserve)
- Iron Canyon Cultural Preserve (new preserve)
- Black Canyon Cultural Preserve (new preserve)

The two existing Natural Preserves, Hagen Canyon Natural Preserve and Red Cliffs Natural Preserve have very sensitive resources that qualify both these locales to be designated as Natural Preserves. There have been cut-outs in these areas that should be adjusted - and an extension of these boundaries is logical so that the protected area is contiguous.

We are suggesting that the Hagen Canyon Natural Preserve be extended northward to include a fossil bed that is unique in its' plethora of both macro and micro-fossils that are known to be in that particular area. The contribution to the scientific world that waits discovery is extremely valuable in today's world where there are few opportunities like a desert environment where fossils lay close to the surface.

We are proposing a new Natural Preserve in the area of Last Chance Canyon that is known for an extremely fragile riparian area that is a rare commodity in a desert environment. Life in the desert flocks to this water source and as such provides support for a teaming web of life.

We are proposing several Cultural Preserves. The Preserves we are proposing would protect the cultural and historical heritage of the human history that left their mark on Red Rock Canyon in terms of how connected these people were to the land.



The Iron Canyon Cultural Preserve was home to miners who had campsites and were part of the dry placer era when Red Rock was the site for those who meant to make their fortune from the land. The goldrush is an iconic period in American history and Red Rock is one of the few places where there are sites that portray a specific type of mining technology known as dry placer mining whose integrity needs to be protected because of the historical value. The Gold Rush period for Red Rock principally occurred during the early 1890s. The proposed Black Rock Canyon Cultural Preserve is based upon prehistoric cultural resources.

Last Chance Canyon Cultural Preserve contains a portion of the much larger Last Chance Canyon Archaeological District, which is listed on the National Register of Historic Places for its prehistoric content. California State Parks should recognize the importance of this federal designation as well as the nature of the cultural resources present by establishing a Cultural Preserve that both mimics and expand slightly upon that portion of Archaeological District found in the northeast corner of Red Rock Canyon State Park. It would make sense that the State stewarded land would need to be protected as it already is designated as being of archaeological significance on the Federal level. There is a history of pre-historic and historic occupation with archaeological sites that deserve a designation of protection. We are suggesting that the Last Chance Canyon Archaeological District, placed on the National Register in 1972 and including 1486.87 acres of the land acquired by the State in 1994 be extended to protect sensitive resources in the park.

In Conclusion, the Red Rock Canyon Interpretive Association recommends the following actions to be implemented within the final draft elements of the revised General Plan:

1. Encourage and implement programs for recreational activities with minimum impact on RRCSP's natural and cultural resources.
2. Require that only street-legal vehicles be allowed within the boundaries of RRCSP. This would be an action in line with policies already established within Anza Borrego State Park.
3. The RRCIA has numerous suggestions involving potential future trails and/or group campsite placement and would like to offer assistance and insight to State Parks and be involved when future plans are being developed or considered.
4. To keep the all Red Rock Canyon's established protections, and to incorporate many of the elements as written in the previous 1982 General Plan.
5. The expansion and addition of several natural and cultural preserves as described on pages 8 to 10 of this letter.



We thank you for your time and appreciate all that State Parks is doing to thoughtfully consider our submission of comments. Most of the Board members of Red Rock Canyon Interpretive Association have been involved with the park for several decades and some have been active with Red Rock preceding its designation as a State Park. We are committed to the well-being and integrity of the park and appreciate your understanding of the realm of experience and sincerity of our suggestions, requests and comments.

Respectfully,

Carolyn Neipris-Jones

Carolyn Neipris-Jones
Red Rock Canyon Interpretive Association, Pres.
On behalf of the Board of Red Rock Canyon Interpretive Association