



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

Submitted by Red Rock Canyon Interpretive Association

April 26, 2019

To Planning Team Members of the General Plan Revision Process for Red Rock Canyon State Park and related Associates

Red Rock Canyon Interpretive Association is disappointed that, in the second public stage of this most important planning process that will affect Red Rock Canyon State Park for decades, the planning concepts appear hastily put together with what appears to be careless attention to detail and questionable maneuvering of the process.

We will address the Spring 2019 Public Meetings on the General Plan Revision in the same manner as you have put forth:

What we do not want

What we do want

What is missing

WHAT WE DO NOT WANT

Process Confusion

It was noted that one of the attending officials from State Parks at the March public meetings inferred in conversation that the land acquired by State Parks in 1994 was “up for grabs”, so to speak, in terms of classification. It is important to remove any misconception from the planning staff and their invited associates regarding the acquisition of land under the auspices of the S.21, California Desert Protection Act of 1994*. The Desert Protection Act transferred the land,



by an Act of Congress, to the State of California with specific intent and language that it would become part of Red Rock Canyon State Park, the **park** being mentioned three times within the bill.

We were disappointed that there was no reference made to the criteria under the Desert Protection Act and the transfer of lands in the concepts at the meetings. The Act defines the expected management criteria as “to provide maximum protection for the areas scenic and scientific values.”

The title itself, “Desert Protection”, dictates how Congress expected the lands to be managed. The internal purpose of the Act intended restoration of damage since the transfer of lands within Last Chance Canyon was pursued, in part, due to documented recreational impacts. We are further concerned with this reference for, if the State perceived these lands to not be part of Red Rock Canyon State Park, certain vehicular allowances should have been banned for the last twenty-five years pursuant to the Park and Recreation Commission’s published policies.

This invaluable land transfer from the federal government could be jeopardized if California State Parks changed the game plan to one where protection would be downgraded for this magnificent desert landscape. To take this one step further, if the acquired land were removed from the hands of State Parks for negligence in the act of protection, then this whole Revision Process would be a moot point.

RRCIA believes that the second set of public meetings held on March 22nd and 23rd respectively 2019 in Lancaster and Ridgecrest were particularly confusing for the public. We felt that, since there was no formal discussion at the meetings, there was little to no guidance to the small group of attendees. There was no mention in the packet of the vast number of sensitive and critical resources found at Red Rock. Since the public was not provided any data in order to make an informed decision, then, by default, their critique would only be based on opinion. We felt this was a poorly designed exercise because the concepts were put forth completely void of any context. One cannot get any meaning when there is not a frame of reference from which one can make discerning decisions using survey data and critical thinking rather than simply expressing an opinion based on one’s particular recreational preference or whimsy.

It was extremely unclear that the public at large was not being asked to choose between the four different concepts. This was a major oversight. There was no indication that the public could pick and choose what they liked or were being asked to articulate what they felt was missing.



Concept Proposals - General

RRCIA feels that there was both misleading and deceptive wording in the concept proposals put forth to the public. We feel that the concept proposals were poorly written and were less than transparent. On the Introduction page, by quoting the 1982 General Plan, the public might not understand that the land has already been acquired. The concept proposals continued to be an aberration of what we were led to believe was going to be a coherent process. As there was no mention of reclassification in the Notice of Preparation, we did not know that this was something that could possibly be on the table for consideration. It was our understanding that this is a Revision process of the first General Plan under which Red Rock is classified as a **State Park**.

The RRCIA vehemently opposes California State Parks current consideration of downgrading safeguards by reclassifying the State Park into a less protected State Recreation Area. In addition to the caveat that this is a Revision process for a State Park, Red Rock Canyon simply does not meet the legal criteria, as put forth in Public Resources Code 5019.56, to be a State Recreation Area. California Public Resources Code Section 5019.56(a), as quoted on the second page of State Parks Preliminary Planning Concepts document, defines a State Recreation Area Classification as follows: "The areas shall be selected for their having terrain capable of withstanding extensive human impact..." "...Areas containing ecological, geological, scenic, or cultural resources of significant value shall be preserved within state wildernesses, state reserves, state parks, or natural or cultural preserves..."

The suggestion of reclassification from a State Park to an SRA is completely inappropriate. The history of destruction and major impacts to Red Rock Canyon State Park over the decades is undeniable. Much to the chagrin and attempts by Rangers and park staff, these impacts have not been stopped in the park's nearly 50-year history. Rock barriers, fencing and signage have all been used to try and prevent hill climbs and damage, but it continues to be an ongoing saga. There is a smaller contingent of OHV riders that willfully disobey the rules and regulations and cause irreparable damage. This has happened in concentrated zones around major archaeological sites such as Cudahy Camp, where off-roaders have targeted and destroyed sites, as well as in other areas of the park. Rangers at Red Rock documented the OHV damage in the Last Chance Canyon area several years ago, before concentrated efforts were made to mitigate the damage and take a proactive and visible approach to counter certain OHV riders in that area as a means of deterrence. There is nothing comparable in terms of damage done by other user groups. The amount of energy that the park rangers focus in on law enforcement for the OHV riders is disproportionate to the amount of time and energy the park staff spends on other recreational users and park



visitors, which is extremely unfortunate considering the extraordinary resources and learning opportunities offered up at Red Rock.

The visible impacts manifested on this sensitive, fragile, resource-rich desert environment, by allowing OHV access, have been documented by State Park Archaeologist Michael Sampson and other resource scientists over the years. It is our understanding that more current surveys and studies have been done by the Southern Service Center in California State Parks that validates the rich archaeological finds within the park. The Resources Division for State Parks, if queried, can only attest to the vast array of resources we have at Red Rock. A recent photo by the Natural Resources Division points out one of the many rare and sensitive plants at Red Rock.

A planning division gains credibility when there is a structure in place with guidelines that pertain to each park with similar circumstances. It makes sense that Red Rock Canyon State Park, which is comparable to Anza Borrego Desert State Park, should mimic their General Plan without re-creating a new wheel. There should be no disjuncture. Simply said, like-parks should be managed in like-manner (similar terrain should be managed by similar methods). We would even go so far as to surmise that Red Rock may offer even more of a robust resource value than Anza Borrego simply because our resources are so rich and dense in a smaller geographical area. There should be a consistency in how State Parks manage highly sensitive desert parks.

In addition, Red Rock Canyon is surrounded on three sides by Bureau of Land Management properties and the new Onyx Ranch State Vehicular Recreation Area, which allows liberal recreation, especially for vehicles. With such opportunity next door, these values do not need to be duplicated, nor do they have any place, within the sensitive confines of spectacular Red Rock Canyon State Park.

There are very few isolated open areas left in this area of California and it should be guarded and protected as there is no equal to the solitude of nature. The dis-enhancing aspects of OHV that assault the visual and auditory experience of a park visitor should not be dismissed. The trails of dust in the air, that follow the path of the OHV rider and mar the visual pristine landscape that should be an oasis to the eye, can cause serious physical harm from the minute particulate matter that exacerbates the already challenging air quality in Kern County. The auditory impact of OHV in a desert environment where visitors come for peace and solitude is unmistakable as one rider can ruin the park experience for myriad visitors over great distances with the interruption of noise and introduction of particulate (dust) pollution. OHV travel is completely incompatible with other visitor activities within the park, such as hiking, plant identification or bird



watching. We should be honing in on the amazing gifts of Red Rock's vistas and canyons that offer up solitude and quiet, not drowning out with cacophonous sound the tranquility of this environment. Many people flock to the desert for those reason and it is beholden on us as stewards to identify and preserve the silence and viewshed.

The four concepts all proposed that there would be a new joint Red Rock and Onyx Ranch SVRA Visitor Center. We vehemently oppose such an unworkable suggestion. This is NOT an option that merits serious consideration given the divergent use pattern and incompatible interest patterns, as well as the divergent physiography and geology and somewhat different flora and fauna between Red Rock Canyon State Park and Onyx Ranch SVRA. There is a blatant incongruence to a Visitor Center that would promote the Protection of a Desert Tortoise alongside an Off-Highway Vehicle. Blending these factors would be a nearly impossible task, unless a very shallow interpretive approach was undertaken. The rich meritorious interpretive opportunity at Red Rock should not be undermined because of State Park's fiscal approach. This is short term thinking at a cost that would affect the education and enrichment of untold generations for years to come.

Furthermore, merging Visitor Center functions for operational efficiency is damaging to the park visitors experience as well as Red Rock Canyon Interpretive Association, which has funded high quality exhibit production for several decades. The current Visitor Center at Red Rock has state of the art exhibits with museum quality artifacts and an extensive plan that has been in place for many years to complete the exhibits with a specific design that very carefully builds on the established existing exhibits. The RRCIA has steadfastly invested in these tailor-made themed interpretive exhibits for over a quarter of a century, spending \$60,000 to \$80,000 on unique handcrafted designs. In an era of Partnership (RRCIA and State Parks), this exhibitry should not be dismissed.

It is our understanding that Onyx SVRA is a co-managed operation with Bureau of Land Management (BLM). There is absolutely no reason why the OHV visitor experience should be moved or exported to a park that has a very large attendance made up of mostly non-OHV recreation guests. These visitor centers best serve the public by remaining separate. BLM already has a very large Visitor Center that was recently expanded at Jawbone Station. Since a partnership already exists between BLM and State Parks, it makes sense to locate the Onyx Visitor Center at Jawbone Station which is obviously a much more reasonable location. Just imagine the dust and noise that comes with OHV as compared to the tranquil surroundings that exist at Red Rock. The scarred hills of Jawbone are not proudly displayed on walls and in public relations photos



of the State as heralded images of beauty – it is the magnificent unscarred vistas of Red Rock that have this honor.

It is also worth mentioning that State Parks has been telling RRCIA for the past few years that Onyx would be getting their own offices on the Onyx property after their own General Plan was completed. They repeatedly told us that the OHV staff, which has been housed at Red Rock as well as operates out of the Red Rock facility as a base, was only temporary. We believe that the focus of Red Rock Rangers has shifted. There is a culture of operations which has changed from one where the staff were stewards of the park to one where they are spending a larger majority of their time policing the OHV riders who may be illegally trespassing or damaging fencing at the park. This General Plan Revision Process, which has been riddled with questions of trust, is now undermined all the more with even the mere suggestion of a joint hub.

All the concept proposals include a proposed camping and parking area by Red Rooster. This is well known to be an extremely fragile area of the park that is known to have a plethora of rare plants including Red Rock Tarweed; the Red Rock Poppy as well as Red Rock Canyon Monkey Flower. Prairie Falcons nest in the nearby cliffs and those nests would experience increased threats and impact if such a level of human traffic were allowed in that sensitive location.

Concept Proposals - Specific

As far as access, we noted that State Parks have Iron Canyon Road access removed in their concept proposals and this is not at all what we would suggest. We want people to enjoy and have access to our magnificent park, albeit the access needs to be appropriate (that is, street legal vehicles or foot powered or equestrian). We don't want it to be difficult for the average person to access some of the more remote areas of the park and all its riches. It is a calculated risk one has to take when designing access to the park and, as long as it is not too large a footprint, we believe access is very important to the path of travel at Red Rock Canyon State Park.

Concept #4 has much of the park locked up in preserves so there is practically no access and few options for landing places to hike. Desolate wilderness will serve a lot fewer people. We are recommending that you refer back to the suggested map we submitted during the Fall 2018 Comment period (see attachment) which we created in consultation with numerous experts from several fields all with decades of experience with Red Rock Canyon State Park and with great thought to all the sensitive and critical resources as well as the park user experience.



WHAT WE DO WANT

We do want the community to understand the value of this treasured jewel in the California State Park system. We want the Planning Team for the General Plan Revision Process to put forth the unique values that make up the majesty and geology of Red Rock as well as its other attributes.

We would like to see a greater outreach to the community at large regarding this General Plan Revision process. We feel that the planning team could have made more of an effort to publicize the public meetings as well as the proposals and subsequent comment periods to get a more robust attendance at the meetings.

We would like a transparent process as stakeholders in the California State Park System. We have been told verbally and numerous times by the Planning Team, led by Katie Metraux, that previous attempts to complete the General Plan Revision will be taken into consideration. We were told that the letters that were submitted in previous years would be part of the decision-making process. This is very important as over the years many individuals from scientists to spiritual leaders alike took a lot of their time and effort to contribute to this process. Some of these individuals have passed on and their knowledge is invaluable. We do have copies of a number of the letters in order to verify that they are indeed included. We bring this up because we realize the important role that trust has in this process, which becomes all the more valid with verification.

We want State Parks to know that we feel that the OHVR Commission Tour held one month prior to the planning team, announcing two of the four proposed concepts as State Recreation Areas, was ethically inappropriate. We also hope that the OHV community and other State Parks personnel know that there is an obvious route for Onyx users to get from Dove Springs to the OHV limited use area that is North of Red Rock. There is a land bridge that is on BLM property that is safer that allows OHV users to have a smooth transition from one area to the other without compromising precious and sensitive resources within Red Rock.

We do want a balanced approach and equal consideration given to all the user groups, including the Commissions which have oversight over the different areas of interest involving State Parks. We would highly suggest that other Commissions be invited to have familiarity tours of Red Rock Canyon State Park as we know that a great deal of energy on the part of State Park staff went into the tour extended to the OHV Commission Tour which took place, as you well know, one month prior to the Spring public meetings for the Red Rock Canyon



General Plan Revision. We would anticipate that there is ample time to make these arrangements, given that the next public meetings are slated, to the best of our knowledge, for Fall of this year (2019) when, as you most recently wrote, project alternatives will be presented. Giving other Commissions for the State of California an opportunity to tour Red Rock will balance out the playing field of Agencies who have a stake in this process.

You asked which of the four concepts proposed in the March meetings is closest to the one we would like to see. Our response to this is none of them. The concepts are confusing and there are too many inconsistencies and errors to address. We are instead proposing Concept #5. Concept# 5 is attached as the map we submitted previously in the Fall of 2018. We put tremendous thought and resources into the creation of this (Proposed Minimum Expansion of Preserve Protections for Red Rock Canyon State Park). It was designed with as much accuracy as we could apply, knowing the historical map of sensitive resources and recreational interests. The team of experts with whom we consulted for the creation of this map are experienced in numerous disciplines which one might think would merit pause and consideration. At this juncture, we are working in a vacuum and have no idea if anyone in State Parks is reading and studying in detail what is being submitted or if they are simply amassing data without absorption. Should the Planning Team want a detailed analysis with criteria that backs up why we made certain suggestions on the map submitted in Fall 2018, we would be more than happy to comply. We would hope that the Planning Team is not executing an exercise void of consideration of the actual comments that are being submitted.

We brought, up in a face to face meeting with one of the planning officials, the 2000+ comment letters from the Fall 2018 public comment submission that were inspired by the Center for Biological Diversity. The unfortunate response we got was with the inference that it would not be given as much weight as other comments. We find this to be reprehensible. How can you weigh each letter differently? How can you dismiss so casually the effort or belief that each individual has who signed on and takes the time to submit a comment? We hope that the value system to determine the merit of comments submitted has been well vetted, as this is indeed an area of concern.



WHAT IS MISSING

Guiding information was missing in the proposed concepts. There was no mention of State and Federally listed animals in the park, or which animals or plants are endemic to Red Rock. The incredulous lack of acknowledgement of all the sensitive resources in the proposed concepts was preposterous. How can you expect the public to make informed decisions about the park if they do not have any idea of what unique natural resources exist at the park? The public can only make comments based on pre-conceived personal choices if they do not have the criteria to make educated comments. By not even mentioning the flora or fauna, as well as the archaeology, paleontology and other resources, it weights the proposed concepts to a bias where resources are not considered to be important.

As park managers, including the management of all living species within those confines, it is inherent on those involved in the process to put forth an understanding of the riches of the park. Resource ecologists and environmental scientists have weighed in on the role that endemic and rare species play in the web of life and the interconnected cyclical nature of all living things. We are excited to protect animals endemic to the El Paso Mountains (including the Small Miner Snail), as well as those endemic to a limited local region (such as the parched Fringe-toed Scorpion and the Mimic Shoulderband Snail). We are proud that Red Rock provides nesting areas for the Golden Eagle as well as habitat for the Desert Tortoise, among myriad other wildlife.

We have an extraordinary diversity of plants within Red Rock Canyon State Park. Overall, there are more plants in a desert environment than in a Redwood forest. One plant, endemic to the park, is the Red Rock Tarplant, which in turn is critical habitat for yet another associated very unique, small, and endemic Sunbather moth. Two other special plants, the Red Rock Poppy and the Red Rock Canyon Monkeyflower, were first discovered within the park and are only known from a limited local region.

While living species play an integral part of the desert eco-system, so too must the rich records of past life be recognized at Red Rock in the spectacular record of fossil beds that have been the focal point of study and work of paleontologists for over a century.

Cultural resources can be handled with delicacy by simply letting the public know that Red Rock is indeed considered as sacred land and has a rich history, valuable to both historians and archaeologists.



Again, if the public was not made aware of this tremendous treasure trove of riches at Red Rock, then how can one expect them to understand the value of the park and the importance of protecting these precious resources.

We did not see a lot of suggestions about various new trails and facilities. This does not include, clearly, the odious suggestion of a merged Visitor Center. We were told prior to the March public meetings that, with the next round of interaction with the public, we were to include our thoughts on facilities and trails. With that in mind, we thought of numerous enhancements that could be made to the current facilities; we did not pursue it further once we were confronted with the suggestion that State Parks was giving voice and consideration to reclassification, so we reversed our energies and went back to addressing the need to protect the overarching defining classification of the park, which we thought was not in question.

That being said, Red Rock Canyon Interpretive Association would like to have a number of new facilities put in place at Red Rock including:

- An Observatory for Astronomical Use and to take advantage of the Amazing Dark Skies at Red Rock.
- A Research Facility that can be utilized for Geologists, Paleontologists, Archaeologists, Botanists and Wildlife Experts
- A Classroom Facility with New Technology can be utilized for Virtual Interaction as well as group seating for students from elementary to university level.
- A library for Red Rock related resources.
- A small outpost for the Natural History Museum of Los Angeles which would create a partnership between State Parks and the well-respected NHMLA
- A Meeting room and Office for Volunteers and Docents

The above involve buildings of which we suggest the majority be located in the Donely area. It is well known that the current Visitor Center was built in a flood plain. We suggest that State Parks acquire the triangular property under Donely. Additionally, we believe that water can be found in this area as previously proposed land developments close to that area bring credence to this fact.



We felt that more interpretive trails were missing from the recently proposed concepts. However, again, we did not know that land management was still something that was being addressed. We look forward to spending more time pointing out specific trails and routes, based on our cumulative decades of experience at Red Rock, as the General Plan Revision process progresses and we no longer have to put our energies into addressing the absurdity of classification issues.

We would like to see the following new trails:

- An ADA Wheelchair Accessible Trail from the Campground Area Spaces #1 and #2 (parking sites for the disabled) to the Ricardo Visitor Center. This trail has previously been scouted and designed but was shelved with the turnover of State Park personnel and budgetary challenges in the past decade. It has been drafted an interpretive Board Walk.
- A short loop ADA Accessible trail in Scenic Canyon. This would be created from the gate for a short distance to give a sense of the expansive terrain.

We would like to see the following campgrounds.

- Overflow camping in the Opal Canyon Area. This area was used historically by astronomy groups and other group campers, such as the Scouts, and allows access to the public for large groups that otherwise have few resources, given that we have such a small campground.
- A Group Campsite at Donely specifically for Scout Groups and other Large Groups that can be Reserved in Advance.

We would like to see an Interpretive Master Plan that is conducted in collaboration with Universities and Credentialed Museums. We would like to see the oversight of this plan conducted by a planning team that does not have any conflict of interests. We would like to see this plan carefully worked out in conjunction with the Exhibit Designer and Red Rock Canyon Interpretive Association, who have put both money and time into fleshing out, in great detail, the interpretive history and resources of the park for future designs.

We would like to put a focus on educational outreach to include connecting with urban centers. We would like to partner with teachers and schools so that Red Rock will be a primary resource for both teaching and learning. We would like to focus with other parks and institutions to create educational forums for higher learning and to be the nexus of these conversations.



We would like Red Rock Canyon State Park to be designated and protected as a Dark Sky. We would also like Red Rock to be a protected corridor for the Spaceport which is our neighbor to the South. We would like the skies above Red Rock to be protected and maintained to have an air quality that should be commensurate with a clean environment.

We will close with reaffirming what we would like to see for Red Rock Canyon State Park. We would like to see this magnificent park, with its unique characteristics and delicate formations, appreciated, respected and preserved for future generations. We would like to see Red Rock managed under the guise of wise stewardship. We would like Red Rock to be empowered by those who have the honor of caring for it, as the icon it is for California as one of the most extraordinary parks in the California State Park System.

Respectfully,

Carolyn Neipris-Jones

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

*CALIFORNIA DESERT PROTECTION ACT OF 1994: Title VII, Sec.701, Transfer of Lands to Red Rock Canyon State Park

Upon enactment of this title, the Secretary shall transfer to the State of California certain lands within the California Desert Conservation Area, California, of the Bureau of Land Management, comprising approximately twenty thousand five hundred acres, as generally depicted on two maps entitled ``Red Rock Canyon State Park Additions 1'' and ``Red Rock Canyon State Park Additions 2'', dated May 1991, for inclusion in the State of California Park System. Should the State of California cease to manage these lands as part of the **State Park System**, ownership of the lands shall revert to the Department of the Interior to be managed as part of California Desert Conservation Area to provide maximum protection for the area's scenic and scientific values.