



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENTS ON THE  
RED ROCK CANYON STATE PARK PRELIMINARY GENERAL PLAN  
REVISION AND DRAFT ENVIRONMENTAL IMPACT REPORT (published  
October 2022)

**Submitted by Red Rock Canyon Interpretive Association**

P.O. Box 2406 Tehachapi, California 93581 \* [www.RedRockRRIA.org](http://www.RedRockRRIA.org)

December 15, 2022

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

### INTRODUCTORY OVERVIEW

Red Rock Canyon Interpretive Association would like to thank everyone at State  
Parks for your commitment and diligence in staying with this General Plan  
process through to completion after several decades of uncertainty and flux.

This Draft General Plan Revision in Chapters 1, 2 & 3, is very complete and is  
thorough in its discussion of the variety of resources within the park, visitor's  
needs and management. The fragility of plant and animal life, cultural,  
archeological, and paleontological resources found in the park is well  
documented in these chapters, however, some of the guidelines and proposed  
maps (ex: Figure 4-1, p. 158) in Chapter 4, The Plan, conflict with the overall  
mission of Red Rock Canyon State Park. These guidelines do not adhere to the  
Classification of State Parks, and therefore do not adequately reflect preservation  
of fragile Park resources, nor actual visitor's needs. In addition, the EIR  
connected to The Plan, does not adequately discuss the impacts of allowing  
access to OHV travel on these two routes and through the campground.

It is our opinion as Red Rock Canyon Interpretive Association that portions of  
The Plan, as recommended, do not adhere to the Declaration of Purpose, nor the  
Classification definition as stated in the first portion of The Plan, in the following  
manner:

WE DO NOT AGREE to allowing non-licensed, motorized vehicles access  
through the park along Sierra View Road, the Cantil Wash to Dove Springs, and  
through the Ricardo Campground. These access routes, if allowed, will impact



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

Park resources and do not “directly enhance the public’s enjoyment of the natural, scenic, cultural or ecological values of the resource”. There is NO mention of OHV travel under any circumstances in the State Park Classification as described below. (Refer to map figure 4-1, chapter 4.3.1, State Park Classification, PRC Section 5019.53).

Section 4.3.1: State Park Classification, PRC Section 5019.53 (p. 157): “*Parks consist of relatively spacious areas of outstanding scenic or natural character, often containing significant historical, archaeological, ecological, geological, or similar values. The purpose of state parks shall be to preserve outstanding natural, scenic, and cultural values, indigenous aquatic and terrestrial fauna and flora, and the most significant examples of ecological regions of California, such as the Sierra Nevada, northeast volcanic, great valley, coastal strip, Klamath-Siskiyou Mountains, southwest mountains and valleys, redwoods, foothills and low coastal mountains, and desert and desert mountains.*”

**Each state park shall be managed as a composite whole to restore, protect, and maintain its native environmental complexes to the extent compatible with the primary purpose for which the park was established.**

The purpose of Red Rock Canyon State Park is “*to preserve and protect the extraordinarily high desert landscape, exceptional natural ecosystems, unique vegetation communities, wetland/riparian resources, diverse flora and fauna, and irreplaceable archaeological and historical resources, and to recognize, honor, preserve, and interpret the culture and traditions of people who once called the Park home.*”

Some of our more salient and detailed comments on the preliminary General Plan and Draft EIR are outlined below.

### **#1 PROPOSED EXEMPTION TO PRESERVE ON-FOOT OPEN ACCESS FOR PEDESTRIANS AND HIKERS TO EXPLORE TERRAIN UNINHIBITED**

State Parks are not wilderness areas to remain completely untouched by humans, but are areas where plant, animal, and their habitats are to be protected. If visitors are on foot, they can still access these areas with minimal environmental impact. This is outlined within State Park definitions for Preserves.

Recently “Off-trail Use Restrictions for Preserves and Reserves” were adopted by State Parks (California Code of Regulations Section 4325) whereby no person shall leave trails or board walks in Natural Preserves, Cultural Preserves, State Cultural Reserves, or State Natural Reserves within the California State Park



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

System, unless approved by the Department. State Parks significantly tightened and restricted access to these Preserves and Reserves, limiting foot access to only trails. These extremely restricted new access rules for natural preserves will impact visitor experience at Red Rock.

No one previously envisioned such a restriction on movement within Red Rock Canyon. Preserve designations remains an important tool of course. These codify that sensitive resources exist; however, they were never envisioned to restrict visitor use in such a dramatic way.

We support trail restrictions for most of the Reserves and Preserves throughout California State Parks. We DO support the intermittent closure of certain areas within preserves or known nesting areas, for wildlife breeding and nesting purposes. However, we must all recognize that Red Rock Canyon State Park is an extremely unique case study and that these regulations would severely impact the quality of our park's existing visitor use experience. While well founded elsewhere, a blanket policy whereby no visitors could leave trails would exclude visitors parked at Red Cliffs from crossing the rock barrier hemming in vehicles to approach and interact with Red Cliffs. We also want to encourage and allow educational ventures such as geology classes, field trips by paleontologists and flora and fauna aficionados as well as artists to continue to have access, use and enjoy the spectacular landscape up close.

Visitors to Red Rock Canyon currently travel freely by foot within two large wonderful natural preserves - Red Cliffs Natural Preserve and Hagen Canyon Natural Preserve. These Preserves lie at the heart of our visitors' experience and contribute immensely to the enjoyment of this magical place. Every day you can find visitors traveling along State Hwy 14 through Red Rock Canyon who park in the Hagen Canyon or Red Cliffs parking lots and venture forth to touch and photograph the cliffs. Each is drawn to their particular spot by fascination and awe.

State Parks did recognize that there are exceptions to the rule and in the California Public Resources Code, State Parks permitted greater latitude to retain previously allowed foot access, if such a provision becomes incorporated in a General Plan document or other management documents.

In CCR Section 4325 - Title 14, Division 3, Chapter 1 Section 4325 Off Trail Restrictions – Preserves and Reserves Section b reads, “Notwithstanding (a) the entirety of portions of Natural Preserves, State Cultural Reserves, or State Natural Reserves may be open to off-trail access”, furthermore:

- (1) On routes of travel that have been shown in a general plan or management plan or adopted in a similar process.



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

- (2) In an area that has been designated open for off-trail use by the park unit's general plan or a specific management plan.
- (3) Or, on a route of travel or in an area that the District Superintendent designates open for off-trail use by posted order after determining that off-trail use is important for public access and where it has been determined that impacts to the resources for which the park unit was established will not be significant.

We are asking that an exception be built into the General Plan for Red Rock that would allow pedestrian use off-trail in the Preserves at Red Rock Canyon State Park to allow the landscape to continue to be one of exploration, adventure and awe for generations to come, outside of breeding or nesting periods.

While aware that a provision would need to be added to the current General Plan Revision to retain the historic public access enjoyed within these desert Preserves, to date California State Parks has been mute on this subject within all its concept plans, including the current Preliminary General Plan Revision. Being mute is equivalent to not grandfathering in historic use and therefore constricting all future access to trails that do not reach or interact with the cliffs. This will impact every artist and photographer who wants to capture what inspires them most. It will affect every botanist who wants to more closely examine the tiny, splendid flora found within the canyon, especially each spring. This has ramifications for all visitors.

We need to ensure that retention of historic on-foot access is preserved, until and only if California State Parks can document that significant impacts or degradation are occurring. A review of historic imagery garnered over that past 100 years does not illustrate that any significant negative impacts have occurred from such access on foot.

**RED ROCK CANYON INTERPRETIVE ASSOCIATION IMPLORES YOU THAT NOW IS THE TIME TO ENACT CCR 4325'S ALLOWANCE OF OFF-TRAIL HIKING TO CONTINUE THE LONGSTANDING PUBLIC PATTERN OF THE ENJOYMENT OF RED ROCK CANYON STATE PARK. IT IS CRITICAL FOR THE VISITOR'S QUALITY OF EXPERIENCE TO WRITE AN EXCEPTION TO THIS CODE FOR RED ROCK CANYON STATE PARK.**

### **#2 SIMILAR DESERT STATE PARKS SHOULD BE MANAGED IN A COMPARABLE FASHION**

It is logical to expect that, within California State Parks, parks that bear similar resources and similar sensitivities should be managed in a similar fashion. Since the 1982 General Plan for Red Rock Canyon, perhaps 10 species new to science



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

have been identified from within or adjacent to the park. More locally endemic plants and animals have also been discovered. Field research and archival studies have flourished providing volumes of new information about the sensitivity as well as the impressive biologic, cultural, geological, and paleontological resources of this park. Documentation has also occurred regarding certain recreational impacts.

The known resources of Red Rock Canyon are on a par with those documented for Anza Borrego Desert State Park. Anza Borrego accomplished its General Plan in 2005. The State Parks General Planning Handbook states "General planning considers the unit within the larger context of the State Park System, using and referencing statewide plans already in place" (page 18).

**Unless very specific and detailed objections can be raised, Anza Borrego's General Plan should be a strong model for Red Rock Canyon's General Plan Revision.**

**#3 RRCIA SUPPORTS ALTERNATIVE 2** (presented as Concept #4 in 2019) for the General Plan for Red Rock Canyon State Park.

"Alternative 2 would focus on the protection of sensitive natural and cultural resources and would not allow any OHV use at the Park, including designated primitive routes."

Concept#4 is outlined as follows in the General Plan Revision - "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."

While Red Rock Canyon Interpretive Association supports Alternative #2 it is with the caveat that there should be NO OHV travel allowed in the park as is being suggested by State Parks for ingress and egress routes. There is no justification for OHV travel within the confines of the park. No exceptions.

**#4 RRCIA ADVOCATES FOR NO INGRESS AND EGRESS ROUTES TO BE PROVIDED AS SHORT-CUTS THROUGH THE PARK FROM OHV AREAS OUTSIDE OF THE PARK.**



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

The proposed General Plan suggests the retention/designation of Ingress/Egress non-licensed OHV travel through Red Rock Canyon State Park via two routes:

- A. Around Ricardo Campground to Red Rock Wash Road up to Dove Springs BLM OHV Area
- B. Along Sierra View Road from Hwy 14 connecting EP 465 to Dove Springs BLM OHV area outside RRCSP.

The discussion on OHV Ingress and Egress Corridors is greatly biased towards non-licensed OHV recreationists at the expense of the sensitive resources that these vehicles might encounter if illegally traversing historical primitive routes connected to these access routes. It will be much more difficult for Park Rangers to enforce non-licensed vehicle regulations along these access routes, than to not allow such OHVs within the Park entirely.

We disagree with the inclusion of any OHV within the boundaries of Red Rock Canyon State Park. Allowing ANY motorized access of non-street legal vehicles is in direct violation of the classification of a State Park.

While the CA State Vehicle code does include several kinds of vehicles as "Off Highway Vehicles", Non-Street Licensed Vehicles, i.e., Green Sticker or Red Sticker vehicles should NOT be allowed on any roads within the park, including Sierra View Road and the Red Rock/Cantil Wash road.

Proposing the use of Sierra View Road as a recreational travel route indicates a tremendous lack of sensitivity to the proximity of a Registered Archaeological District and known culturally sensitive area. State Parks is well aware that quite often when they conduct surveys, they are continually surprised that there are even more archaeological and cultural sites discovered than they had anticipated. Given this track record, one would think that the planning team would have a heightened awareness of the resources in the park. Under no circumstances should OHV be allowed near a proposed cultural preserve. Under no circumstances should OHV be proposed near any culturally sensitive site at Red Rock Canyon State Park. Red Rock is considered sacred ground by the Native Americans who live in the area as well as those who make the journey to the park from Northern and Southern California.

Allowing non-licensed vehicles to travel through the park will increase the chances that they will travel on historical routes and primitive roads that are closed to such vehicles. This would threaten sensitive plant and animal life, and other natural resources in sensitive areas.

We agree with the statement that there are "Too many entrances into the Park, including unmapped primitive roads for a state park of this size". This directly relates to the Plan's recommendation that Sierra View Road and the Red Rock/Cantil Wash be utilized as an access corridor to OHV open areas outside



## RED ROCK CANYON INTERPRETIVE ASSOCIATION

### COMMENT LETTER

the park. OHV's, ATV's and other non-street licensed vehicles could and probably will, try to access historically non-designated primitive roads that are connected, or adjacent to, these recommended OHV access routes.

Specifically, there is a significant risk of OHV access to primitive routes, such as the Opal Peak trail or the Roaring Ridge Trail, that historically connect to Sierra View Trail from the south. Even if efforts to fence off these southern routes is implemented, OHV recreationists, and even ATVs could punch through fence-lines illegally within Red Rock SCP, as has been observed in other areas now fenced off from OHV travel within the Park. These southern routes connect to trails and routes within Nightmare Gulch and Last Chance Canyon, areas that have known sensitive natural resources. Potential damage to sensitive resources from these connector routes is a serious threat if access by OHV's is allowed along Sierra View Road. Concerning the Red Rock/Cantil Wash, there is also a significant risk to sensitive plant species that utilize sandy washes as their preferred habitat, and the wildlife that depend on them. Wildlife corridors from the nearby Butterbrecht Canyon and Piute Mountain range are also impacted by the use of the Red Rock/Cantil Wash heading north to Dove Springs Open area on the west portion of the Park.

There is a direct contradiction outlined in Section 3.1.3.1: Issue 13; Connectivity to Habitat Corridors. The suggested map included in Chapter 4, The Plan, Figure 4.1 (p. 158), directly contradicts the issue of "connecting habitat corridors." Historical primitive roads that connect with the recommended Ingress/Egress roads along the Red Rock/Cantil Wash and Sierra View Road, have a high potential of crossing and adversely impacting habitat corridors as well as wildlife transportation corridors.

Allowing OHV access through the park on either the Red Rock/Cantil Wash or Sierra View Road, could threaten sensitive plants that use desert washes as their preferred habitat. The Sand Plant (*Pholisma arenarium*), Desert Calico (*Loeseliastrum matthewsii*) and even the endemic and CRPR 1B.1 ranked threatened. Red Rock Canyon/Parry's Monkeyflower (*Erythranthe rhodopetra*) all have been observed growing within desert washes.

There should be no OHV's allowed in the park, including designated primitive routes that can have detrimental unintended impacts, including noise which affects all desert residents both wildlife and human as well as the aesthetic enjoyment of the desert landscape that is the primary reason for most visitors coming to Red Rock.

It is written in, "OHV Use Guideline 1-1: The use of OHVs on designated connectivity roads will be monitored by State Parks staff. Access can be rerouted or halted, if necessary, to protect Park resources. State Parks will restore areas that are damaged from unauthorized use per natural and cultural resource management guidelines and policies." Simply stated, **THIS IS UNACCEPTABLE.**



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

There is no place in a General Plan document that is providing guidelines to protect and conserve to suggest that mitigation to damaged resources is the strategic plan for stewardship.

We will further put forth that the concept of Regional Route Connectivity, is a non-issue and should be stricken from the Plan. There are several routes available to OHV and ATV users (non-street licensed vehicles) that are readily accessible to these recreationists if no OHV travel is allowed within Red Rock CSP.

There are alternative routes that can easily be accessed and utilized as transportation corridors including Power Line Road and EP-15. Power-line Road is near the Park's southern and western boundaries, leading almost directly to the Dove Springs Open area. There are also routes off of Hwy 14 north of Red Rock that lead directly into the Red Rock-Inyokern Road and Road EP-15, skirting the north boundary of the Park. These routes are easily accessible from either Dove Springs or Jawbone Canyon. It is inappropriate to compromise the resources and to impact visitors to make it more convenient for OHV recreationists to save time to get from point A to point B. Since the point of riding trails is to enjoy the ride, then taking a few more minutes in transit would be beneficial to OHV riders.

DO NOT allow non street-legal or non-licensed OHVs on any road within the park. To make any exceptions to this is completely unnecessary and goes against the mission of Red Rock Canyon State Park and its' Classification as a State Park.

**WHILE RED ROCK CANYON INTERPRETIVE ASSOCIATION SUPPORTS ALTERNATIVE #2 IT IS WITH THE CAVEAT THAT THERE SHOULD BE NO OHV TRAVEL ALLOWED IN THE PARK AS IS BEING SUGGESTED BY STATE PARKS FOR INGRESS AND EGRESS ROUTES. THERE IS NO JUSTIFICATION FOR OHV TRAVEL WITHIN THE CONFINES OF THE PARK. NO EXCEPTIONS.**

### **#5 ALLOWING OHV AT A PARK WITH STATE PARK CLASSIFICATION CONTRADICTS THE VERY DEFINITION OF THE PRIMARY GOAL OF A STATE PARK.**

The VALUES established by State Parks for the unit classification of a STATE PARK is inconsistent with the allowance of any OHV activity in a state park. California Public Resources Code 5019.53 says that "The purpose of state parks shall be to preserve outstanding natural, scenic, and cultural values, indigenous aquatic and terrestrial fauna and flora, and the most significant





## RED ROCK CANYON INTERPRETIVE ASSOCIATION

### COMMENT LETTER

examples of ecological regions of California, such as the ... desert.... Each state park shall be managed as a composite whole in order to restore, protect, and maintain its native environmental complexes to the extent compatible with the primary purpose for which the park was established. Improvements undertaken within state parks shall be for the purpose of making the areas available for public enjoyment and education in a manner consistent with the preservation of natural, scenic, cultural, and ecological values for present and future generations. ... Improvements that do not directly enhance the public's enjoyment of the natural, scenic, cultural, or ecological values of the resource, which are attractions in themselves, or which are otherwise available to the public within a reasonable distance outside the park, shall not be undertaken within state parks."

State Recreation areas on the other hand, have specifically been classified as such in California Public Resources Code 5019.56, "...to provide outdoor recreational opportunities," as is the case with Onyx Ranch very recently established to the direct West of Red Rock Canyon State Park.

The unfortunate OHV allowances at Red Rock that have gone on for decades (due to the lack of adoption of a Revised General plan following the acquisition of additional acreage at the park) do not call for the continuance of activities that clearly do not align with Department Policy.

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.

Red Rock Canyon Interpretive Association feels 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 as well as its' classification as a State Park. Too often individuals and user groups who are at odds with the conservation side of the balance of scales puts a myopic spotlight on their individual rights and the issue of "access." There is also such a thing as 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 self-centered focus of a specific user group.

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 INTERPRETIVE ASSOCIATION COMMENT LETTER

Red Rock Canyon is surrounded on three sides by Bureau of Land Management properties and the new Onyx Ranch State Vehicular Recreation Area, which allow liberal recreation, especially for vehicles. Onyx Ranch SVRA to the West of Red Rock includes 26,000 acres of "scenic and challenging terrain for all-terrain vehicles (ATV's), motorcycles, recreational OHV's, and 4X4 vehicles." The BLM Jawbone Canyon OHV area to the South of Red Rock consists of 5,132 acres. The BLM Dove Springs OHV area to the North of Red Rock consists of 3,935.8 acres **There is a total of over 35,000 acres of OHV terrain surrounding Red Rock on three sides.** Not to mention BLM's Spangler Hills OHV area to the Northeast of Red Rock which encompasses 95,219.6 acres.

With such opportunity next door, these values do not need to be duplicated within the sensitive confines of spectacular Red Rock Canyon State Park, nor are they permissible under the classification of "state park."

### **#6 THE PURPOSE OF THE 1994 DESERT PROTECTION ACT WAS TO PROVIDE MAXIMUM PROTECTION FOR SCENIC AND SCIENTIFIC VALUES.**

The California Desert Protection Act of 1994 transferred over 17,000 acres to Red Rock Canyon State Park with the Congressional intent of restoring prior recreational damage. The legislation specifically emphasized management of this acreage "to provide maximum protection for the areas scenic and scientific values." The time has arrived for California State Parks to embrace their fundamental stewardship responsibility for this sensitive, beautiful, inspiring, scientific, and culturally significant landscape. The integrity of the California Desert Protection Act should be upheld by standing by its core values, including maximum protections for this magnificent land. Maximum protections do not include allowing OHV recreational use in sensitive and fragile desert terrain of Red Rock Canyon State Park as transit corridors to get from Point A to Point B.

The suggestion to allow OHV to use corridors in Red Rock Canyon State Park as short cuts to get from one OHV locale to another when it is the exact same group that has such a history of documented damage that the land had to be protected from it in the first place in 1994 under the California Desert Protection Act is irresponsible and incomprehensible.

### **#7 ESTABLISHED FEDERAL GOVERNMENT LAND MANAGEMENT PLANS INCLUDE RED ROCK IN PROTECTING RESOURCES WHICH CONFLICTS WITH ANY USE OF OHV AT THE PARK.**



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

There are several guiding land management plans which include Red Rock Canyon State Park and/or its' desert terrain with a protected status.

Per the BLM's Western Mojave Plan (WEMO), and the CDCA and CDCA Plan amendment, the Mojave Desert, its plant and animal life, and ecosystems are determined to need protection. "The West Mojave Plan/Habitat Conservation Plan and CDCA Plan amendment present a comprehensive strategy to conserve and protect the desert tortoise, the Mohave ground squirrel, and nearly 100 other sensitive plants and animals and the natural communities of which they are a part while providing a streamlined program for complying with the requirements of the California and Federal Endangered Species Acts." As Red Rock Canyon State Park is in the Mojave Desert it falls under the jurisdiction of the above land management plans.

Giving access to OHVs along the Sierra View Road, and the Cantil Wash is in direct conflict with these plans. Since Red Rock Canyon State Park is still a part of the Mojave Desert, and contains many sensitive and/or threatened wildlife, archeological and paleontological resources, it would be in direct conflict with these established plans to allow any non-licensed OHV travel through the park.

The Desert Renewable Energy Conservation Plan, Land Use Plan Amendment specifies Last Chance Canyon as an ACEC (Area of Critical Concern) that has national cultural significance. This federal designation endorses our stance that there should be no OHV activity in the vicinity (i.e. Sierra View Road) that can compromise the integrity of any historical, cultural, scenic, wildlife or any other natural resources.

In addition to these land management plans one needs to take into consideration the Endangered Species Act of 1973 that protects the Desert Tortoise which we are honored to have at Red Rock.

Red Rock is the home to golden eagles and other birds of prey that nest at the park. Red Rock also provides the only extensive protected lands in the area for many covered species including Agassiz' 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.

We also 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).

In addition to wildlife, Red Rock also contains numerous desert plants and flora that are an essential aspect of the desert eco-system. We have an extraordinary diversity of plants within Red Rock Canyon State Park. Overall, there are more



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

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.

The plethora of land management plans that give a directive to protect the fragile environs of Red Rock and the Mojave Desert should be sufficient to deter any thought of allowing OHV travel inside the boundaries of the park.

### **#8 TRAIL RIDING AND USE OF PRIMITIVE ROADS AS TRANSPORTATION CORRIDORS NOT ALLOWED UNDER GENERAL PLAN ADOPTED IN 1982**

Non-street legal OHV's have been using Red Rock's primitive roads as a transportation corridor to get to and from open unrestricted OHV use areas owned and managed by the BLM (Jawbone Canyon to the southwest of Red Rock and Dove Springs to the northwest). Since the acquisition of additional acreage due to the Desert Protection Act in 1994, Red Rock has gone without a legal directive for the park as a whole. It is clearly stated in the General Plan adopted for Red Rock in 1982 that vehicle recreation is an "inappropriate use" under the "State Park" classification.

Transit use through the park to specifically utilize adjoining properties does NOT meet the criteria of use that engages with the enjoyment and inspiration of the park's resources and their values. Furthermore, the noise and dust from vehicles simply traveling through the park (sometimes in large numbers), while using the park simply as a connective route, can significantly "impair or detract" other park visitors "from the natural setting and quality of park uses determined to be of primary importance." As such, OHVs using the Park as a pass through to access vehicular recreation pastimes located on opposite sides of the park would be clearly defined as and determined to be an "Inappropriate Use" under the existing 1982 General Plan.

### **#9 OHV USERS ARE A SMALL FRACTION OF THE PARK VISITORS YET HAVE MAINTAINED A DISPROPORTIONATE INFLUENCE ON RED ROCK**

The new nearby Onyx Ranch State Vehicular Recreation Area lacks facilities. Onyx Rangers and staff reside and operate out of Red Rock while the Red Rock appointed Rangers also appear to spend a very large amount of their time and resources on OHV activities, enforcement and medical. According to a study done by State Parks ten years ago but considered still valid, only 16.3 percent of



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

park users use the park for OHV recreation while 27.5 percent come to Red Rock for recreation fitness including hiking, walking, and running and a 38.8 percent of users go to the park to see the desert landscape.

### **#10 THE THREAT OF ILLEGAL AND POTENTIAL RETALIATORY ACTIONS DOES NOT JUSTIFY ALLOWING OHV ACCESS.**

The RRCIA does not support State Parks operating under an environment that is fear-based on the domineering activities of OHV in the park in the past several decades. The impact evaluation (5.23.2.2) conjectures in bold type that there will be “more extensive impacts” if Alternative 2 is adopted. Although it can be realistically envisioned that there will be a transition period from allowing restricted OHV in the park to having no visible activity of OHV in the park, this needs to be addressed by allocating more resources to monitoring and enforcement. Eventually years from now, illegal activity will diminish and hopefully decades from now will cease to exist.

**WHILE RED ROCK CANYON INTERPRETIVE ASSOCIATION SUPPORTS ALTERNATIVE #2 IT IS WITH THE CAVEAT THAT THERE SHOULD BE NO OHV TRAVEL ALLOWED IN THE PARK AS IS BEING SUGGESTED BY STATE PARKS FOR INGRESS AND EGRESS ROUTES. THERE IS NO JUSTIFICATION FOR OHV TRAVEL WITHIN THE CONFINES OF THE PARK. NO EXCEPTIONS.**

### **#11 CONSIDERATION OF ALL LIVING SPECIES SHOULD BE THE INTENT AND NOT JUST EFFECTS ON HUMANS.**

The verbiage in the General Plan has been written with statistics relating to humans as the main focus and does not include nature as having the same importance and relevance. This is a fundamental error in perspective and judgement as we believe the preservation and protection of all living things should be taken into consideration and given equal value.

Noise and air pollution can not only disrupt but can cause considerable damage as it relates to the survival of other species which includes both plants and animals, as well as impacts to human health.

#### **Air pollutants:**

Living species such as plants, specifically, are absolutely affected by air pollution. Plants need oxygen to survive and if the surface of their leaves or stems are compromised because of particulates so that an exchange of gases cannot take



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

place or is lessened, then their ability to thrive or even survive becomes threatened. References made in the EIR had the narrow scope of viewing this as it would affect humans only.

### **Particulate Matter, Chapter 5, EIR, section 5.8, p. 289 – 300.**

Definition: "EPA is concerned about particles that are 10 micrometers in diameter or smaller, because these particles generally pass through the throat and nose and enter the lungs.... can affect the heart and lungs and cause serious health effects, even death." If 10 mcg cause problems for humans, what do they do for the much smaller systems of most, if not all, desert dwellers?

### **Sound and Vibration:**

Animals depend on numerous senses for survival such as navigation, safety, consumption, as well as both hearing and communication. Obscuring clarity of sound can have dire circumstances on wildlife. Other species can also be harmed by noise pollution, yet all these studies and charts have to do with humans and NOT with animals or plants:

#### **5.16.2.2 Sound and the Human Ear**

#### **5.16.2.5 Negative Effects of Noise on Humans**

#### **Table 5.16-2 Subjective Reaction to Changes in Noise Levels of Similar Sources**

#### **Table 5.16-3 Human Response to Different Levels of Ground borne Vibration**

**5.16.3.1 Existing Sensitive Land Uses** – "Noise-sensitive land uses located near the Park include ... Onyx Ranch SVRA. The closest sensitive uses are approximately 3,000 feet west of the Red Rock Canyon State Park and these sensitive uses are completely shielded by existing terrain with no direct line of sight to the Park." Animals and plants are right there.... not 3000 feet away from ANY part of Red Rock Canyon!

Natural Resources should be the foundation of this document, given the classification of the park unit. Section **1.3.3 Park Significance** of the DPR's document mentions that DPR "**protects and preserves.... Intact ecological communities that provide refuge for a diversity of plants and animals, including rare and listed species.**" If this is already stated in this document, should the studies not be focused on nature more than humans?

## **#12 AIR QUALITY CONCERNS NEED TO BE MORE CAREFULLY CONSIDERED AS TO POTENTIALLY SIGNIFICANT IMPACTS**

On holidays or other days with increased non-licensed OHV traffic on Sierra View road, particulates as dust will be generated which can travel for many miles. Since the prevailing wind patterns are from the NW, and camping areas or Dark



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

Skies designated areas are being planned for the northwest and northeast portions of the Park, these dust plumes can cause an impact to campers' health and a loss of visibility to astronomers viewing at night. This impact cannot be mitigated, and therefore, no non-licensed OHVs should be allowed on Sierra View Road.

The CAAQS For Criteria Pollutants for Eastern Kern County should be more carefully considered, as pertains to the criteria pollutants that are in NAAQS "Attainment Maintenance", or in State "Non-Attainment" classifications. The Indian Wells Valley, just to the north of Red Rock Canyon SP is in a "Non-Attainment Status" according to the CAAQ Standards.

In addition, there is a glaring omission within Chapter 5, EIR, section 5.8, **Air Quality**, if OHV travel is allowed along Sierra View Road, the Red Rock/Cantil Wash, or the Ricardo Campground, as suggested in Chapter 5, EIR, section 5.23.4 (Concept #3 at the 3/2019 Scoping Meeting). PM 10 as particulates emitted by OHV traffic along these routes, as well as licensed vehicles, must be considered in this analysis. In particular is the discussion in section 5.8.4, Impact Analysis. It is stated that off-road equipment use during future construction activities would be short-term and therefore no significant impacts are predicted. However, there is another glaring omission of OHV traffic along the suggested routes for the section 5.3.4 Alternative. The potential emissions from OHV travel have not been considered, and there is no Air Quality data to confirm CAAQS attainment of PM 10 emissions within RRCSP. Indeed, because the Park is just south of Indian Wells Valley (a state non-attainment area), and within the prevailing wind pattern that transports particulate emissions from the northwest to southeast, there is a chance of non-attainment within the park with increased OHV travel along the suggested ingress/egress routes.

In addition, the following statement does not make sense if OHV travel, especially during special events or holidays (Chapter 5, EIR, section 5.8.4, Impact Analysis):

*"The enforcement of unrestricted OHV recreational use in the Park would also benefit air quality." Therefore, the General Plan implementation would not result in a significant increase in pollutant emissions related to automobile use."*

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 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.

The health and aesthetic considerations of air pollution need to be given more consideration when OHV comes into the conversation. OHV is the main source of air pollution from recreational users that can be easily obviated.



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

### **#13 NATURAL RESOURCES DESERVE MORE ATTENTION IN THEMES FOR INTERPRETATION.**

Having an Interpretive Master Plan is a great foundation for interpretation. 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 have worked diligently to support the fabrication of high-quality thematic exhibits. We would like to have the support and continued collaboration of State Parks to complete the exhibit designs which were approved in partnership with State Parks as a carefully thought-out unified interpretation for Red Rock.

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.

The education goals and guidelines plan of action is well laid out and articulated. There are a few things that could be fleshed out when it comes to content. The themes covered the major areas.

We would have delineated Theme 2 and separated that into several different topic themes such as Flora, Fauna, Eco-systems, Adaptation. These are such major areas they each are deserving of their own theme. This is an oversight as each of these natural resources has its own expansive world to be elaborated on and explored.

In addition to completing the exhibits as planned for the Visitor Center, it would also be important to complete the native plant garden out front. There is a rich interpretive experience which exists at the park (as well as with outreach). Using the knowledge and known resources of experienced individuals such as Mark Faull (Retired State Parks Employee with decades of experience) who is an extraordinary font of knowledge on interpretive subjects and the history of interpretive venues at Red Rock would be instrumental in creating a strong Master Plan.





## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

### **#14 IF A DETAILED SUPPLEMENTAL EIR IS NEEDED IT CANNOT BE PIGGYBACKED ONTO A PREVIOUS PROGRAMMATIC EIR WHICH THIS GENERAL PLAN IS ASSERTING TO BE.**

It is **erroneous** to consider the General Plan revision as also being a Programmatic EIR. An EIR supports the General Plan. Making recommendations, determining issues, and suggesting concepts do not meet the definition of "environmental impacts". The EIR must include not only impacts (as opposed to issues), but mitigation measures that MAY alleviate or offset impacts, as well as impacts that CANNOT be mitigated. These situations are not described within the General Plan Revision. There is a contradiction within the EIR wording that states that "more environmental evaluation may be needed in the future" if environmental impacts are indicated prior to projects being implemented. This would trigger a detailed supplemental EIR and could not "tier" onto a previous programmatic EIR.

As stated above any impacts that are found during the implementation of The Plan, and also while planning for future projects will require a full supplemental EIR. In these cases, "Tiering" off of the original EIR submitted with the original EIR will not suffice as a thorough environmental analysis.

Per CEQA, Under PRC Division 13, EIR, Section 21093, "*a tiered EIR must ensure that environmental impact reports prepared for later projects which are consistent with a previously approved policy, plan, program, or ordinance concentrate upon environmental effects which may be mitigated or avoided in connection with the decision on each later project.*"

In the State of CA PRC, Division 13, Section 21093 it states,

*"(a) The Legislature finds and declares that **tiering** of environmental impact reports will promote construction of needed housing and other development projects by (1) streamlining regulatory procedures, (2) avoiding repetitive discussions of the same issues in successive environmental impact reports, and (3) ensuring that environmental impact reports prepared for later projects which are consistent with a previously approved policy, plan, program, or ordinance concentrate upon environmental effects which may be mitigated or avoided in connection with the decision on each later project. The Legislature further finds and declares that tiering is appropriate when it helps a public agency to focus upon the issues ripe for decision at each level of environmental review and in order to exclude duplicative analysis of environmental effects examined in previous environmental impact reports.*

*(b) To achieve this purpose, environmental impact reports shall be **tiered** whenever feasible, as determined by the lead agency."*



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

There is no guarantee of consistency of future projects within this proposed EIR for Red Rock Canyon State Park. Each project may expose environmental issues and impacts unknown within the guidelines of this General Plan, or the very general analysis provided by the accompanying EIR. It is incorrect to assume that the Plan recommendations do not result in significant impacts. It is the purpose of the EIR to determine impacts from the recommendations as described in chapter 4, The Plan. The assumption cannot be made within an appropriate, legal EIR following CEQA guidelines, that, by default, that “no significant environmental impacts would occur with implementation of the revised General Plan”, or that potential significant effects are avoided or maintained at a ‘less than significant’ level.

In addition, in Chapter 5, EIR, you state that the “Environmentally Superior Alternative” as described in chapter 5.23.4 should be implemented as The Plan recommends, as this Alternative “focuses OHV use to areas that are not environmentally sensitive.” **This is not a true statement** if considering the issues described in this letter. Several impacts have been previously described which cannot be mitigated. Therefore, prohibiting non-licensed vehicles from entering the Park as in Alternative #2, is actually the “Environmentally Superior Alternative”.

Also in Chapter 5, EIR, section 5.2.2; the statement that “no significant environmental impacts would occur with the implementation of the General Plan” is incorrect if alternative 4 is implemented as suggested in Chapter 5, EIR, section 5.23.

If the public is making recommendations and opinions that would result in significant impacts to Red Rock CSP natural and cultural resources, then they cannot be considered.

**#15 THERE SHOULD BE NO SEEDING OF PLANS TO COMBINE VISITOR CENTERS WITH ONYX RANCH SVRA. IT SHOULD ALSO BE STIPULATED THAT THE OPERATIONS AND FACILITIES OF RED ROCK INCLUDING OFFICES SHOULD BE FOCUSED SOLELY ON SERVING RED ROCK CANYON STATE PARK.**

**A GENERAL PLAN REVISION IS NOT THE PLATFORM FOR REGIONAL PLANNING. THE FUNDAMENTAL PURPOSE OF RED ROCK’S GENERAL PLAN REVISION IS INTENDED SPECIFICALLY AND SOLELY FOR THE BEST INTEREST OF RED ROCK.**

The General Plan Revision Process is legally being undertaken for Red Rock Canyon State Park. It is being undertaken to put forth the best practices and



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

stewardship for Red Rock. It would be a violation of management procedures to utilize Red Rock Canyon State Park's GP Revision process to plan and problem-solve for other parks, specifically Onyx.

By writing outline points "5b and 5c" on the previously proposed Revised Plan Concept, the State Parks planning team transparently admitted that they are solving regional plans when it is the purpose of a General Plan Revision, specifically this Red Rock Canyon General Plan Revision, to focus on what is in the best interest of Red Rock.

### **OTHER PARKS NEED THEIR OWN PLAN FOR PROBLEM-SOLVING THEIR CONCERNS. PROPOSED JOINT OPERATIONS CREATES DISCORD**

When this General Plan Revision process for Red Rock Canyon State Park began one of the principal guideposts for such planning was that outcomes must be consistent with the "State Park" classification of the unit, as defined within Public Resources Code section 5019.53. This basic cornerstone has been ignored throughout the General Plan process. State Parks has suggested compromising and sacrificing different aspects of Red Rock operations as "part of regional planning efforts" on behalf of OHVs that utilized both "BLM OHV Areas and Onyx Ranch State Vehicular Recreation Area."

A Proposed "Joint Onyx/Red Rock Operations Hub at existing Visitors' Center" is unacceptable as the entire tenor of park staff becomes focused on law enforcement and patrolling rather than other administrative duties. Red Rock is not responsible for the lack of planning by State Parks before they made the decision to open Onyx. It is not the responsibility of the General Plan for Red Rock to resolve the issues/problems of a separate and distinct SVRA. Whatever issues State Parks has with neighboring BLM agencies, organizations or individuals needs to be settled without decimating the status quo at Red Rock and its missive. A large part of the staff culture at Red Rock (peace officers and equipment operators) is disproportionately focused on addressing OHV issues and interests that shortchanges the well-being of the park and the majority of its' visitors.

Jawbone Station, which has both a well-established Visitors' Center and new large Operations facility directly adjacent to Onyx, is an obvious partner as was the initial understanding when State Parks undertook the large acquisition of land for Onyx. These two entities need to find common ground for their shared user-group of OHV recreationists to resolve their interactions with visitor and operations administration.

This incredibly poor sighted suggestion of Joint Operations and Facilities by hijacking Red Rock facilities on behalf of Onyx is one that needs to be eliminated with the understanding that Onyx needs to have its own operation or join with Jawbone where they have common ground. For Onyx to partner with Jawbone is a much more sensible move towards partnership and efficiency.



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

It would be a travesty to do a switch and bait to Red Rock Canyon by saying that the sharing of Operations and Facilities was temporary until Onyx got its own permitting and General Plan underway and simply encroach on what should be facilities solely devoted to the interests of Red Rock.

There is limited space at Red Rock for maintenance, housing and interpretive facilities. There is an astounding number of potential uses/needs for these facilities for Red Rock to fulfill its own true potential as can be seen below. It is important to allow for the expansion of Red Rock's education and outreach. The expansion of facilities on behalf of Red Rock serving the public should in no way be limited because there was a lack of space since Onyx has overreached and aggressively overrun Red Rock enabled by State Parks.

There should NOT BE ANY JOINT OPERATIONS/FACILITIES condoned or written into a formal General Plan for Red Rock. This would not be serving the needs of Red Rock.

### **#16 RED ROCK CANYON INTERPRETIVE ASSOCIATION WOULD LIKE TO HAVE A NUMBER OF NEW FACILITIES PUT IN PLACE AT RED ROCK, AS WELL AS TRAILS AND CAMPGROUNDS.**

There are many possibilities to enhance and expand the education, interpretation, and scientific endeavors at Red Rock. Below are just a few of the possibilities.

- 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.
- An office for Red Rock Canyon Interpretive Association.
- 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



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

The above involve buildings some of which may be located in the Donnelly area. We suggest that State Parks acquire the triangular property under Donnelly. 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 proposed having written into the General Plan research and educational facilities such as a lecture/classroom or science lab as well as an Observatory as adjunct buildings to complete the potential for Red Rock's educational and scientific outreach.

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 as 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 Donnelly specifically for Scout Groups and other Large Groups that can be Reserved in Advance.

### **#17 EXTENSION OF HAGEN NATURAL PRESERVE**

Due to the unique sensitivity of resources, Red Rock Canyon Interpretive Association is strongly supporting the extension of Hagen Natural Preserve. There is a cut-out that should be adjusted and now is the time to do so with the General Plan. 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 this 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.



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

### **#18 WE BELIEVE THAT A MORE EXTENSIVE AND WELL FLUSHED OUT CULTURAL MANAGEMENT PLAN FOR RED ROCK SHOULD BE SLATED FOR THE FUTURE THAT WILL BE ABLE TO GO INTO MORE DETAIL.**

As Anza Borrego had an elaborate Cultural Management Plan that was commensurate with the resources at their park, so too Red Rock deserves to have a detailed plan that will adequately approach the plethora of cultural resources at the park.

### **CLOSING SUMMARY**

We realize that a tremendous amount of work has gone into the creation of this General Plan. We trust that the comments that have been submitted not only by our organization but all others as well, will be taken into serious consideration and not summarily dismissed. The experience and thought that has gone into the critiques and suggestions show the passion and commitment that so many have for this most remarkable treasure of a park. The General Plan process for Red Rock Canyon State Park is one that has been belabored for almost half a century. We expect a great outcome for all those who have fought to protect and preserve this magnificent landscape and all its wonders. Thank you for all your hard work. There is a pride in spirit that we all share when we refer to this great land. Thank you for standing up for Red Rock

Respectfully,

*Carolyn Neipris-Jones*

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

CC: Armando Quintero; Wade Crowfoot



# RED ROCK CANYON INTERPRETIVE ASSOCIATION

## COMMENT LETTER

### REFERENCES

#### **INTRODUCTORY OVERVIEW**

##### **References:**

Chapter 4, The Plan, Section 4.6, Goals and Guidelines:

Section 4.6.1.1 Visitor Experience and Recreational Opportunities; Recreation; Non-Street Legal Off-Highway Vehicle Use (p. 200)

Section 4.6.1.2 Other Visitor and Operations Facilities

Section 4.2.1, Declaration of Purpose (p.29)

Section 4.3.1, State Park Classification PRC 5019.53 (p. 154 & p. 157)

The State Park Classification (and mission):

*"Improvements undertaken within state parks shall make the areas available for public enjoyment and education consistent with preserving natural, scenic, cultural, and ecological values for present and future generations. Improvements may be undertaken to provide for recreational activities including, but not limited to, camping, picnicking, sightseeing, nature study, hiking, and horseback riding, so long as those improvements involve no major modification of lands, forests, or waters....**Improvements that do not directly enhance the public's enjoyment of the natural, scenic, cultural, or ecological values of the resource, which are attractions in themselves or otherwise available to the public within a reasonable distance outside the park, shall not be undertaken within state parks.**" (p. 159)*

#### **#1 PROPOSED EXEMPTION FOR OPEN ACCESS FOR PEDESTRIANS AND HIKERS TO EXPLORE TERRAIN UNINHIBITED**

##### **References:**

Chapter 4, The Plan, Table 4-1, Management Zone Uses; Also, Section 4.6.1 Parkwide Goals & Guidelines, Section 4.6.1.1 Visitor Experiences & Recreational Opportunities; -Allowable Use & Intensity, -Recreation, -Hiking (p.189-197)

#### **#2 SIMILAR DESERT STATE PARKS SHOULD BE MANAGED IN A COMPARABLE FASHION**

##### **References:**

Chapter 1, Introduction, Section 1.3, Character and Spirit, Section 1.4, Purpose and Need for the General Plan Revision (p. 24 to 30); Also, Chapter 2, Existing Conditions, Section 2.6, Significant Resources. (p.70 to p.129)

#### **#3 RRCIA SUPPORTS ALTERNATIVE 2 (presented as Concept #4 in 2019) for the GENERAL PLAN FOR RED ROCK CANYON STATE PARK**

##### **References:**

Chapter 5, EIR, Section 5.23 (p. 517)

Section 4.5.3: GP Preferred Concept Route Changes (p. 185)

#### **#4 RRCIA ADVOCATES FOR NO INGRESS AND EGRESS ROUTES TO BE PROVIDED AS SHORT-CUTS THROUGH THE PARK FROM OHV AREAS OUTSIDE OF THE PARK.**

##### **References:**

Chapter 5, EIR, Section 5.3.2, Roads & Trails; Also, Section 5.17.4, Impact Analysis, OHV Ingress, Egress Corridors (p.270 & p.448)

Section 2.8.2 Regional Planning Influences (p. 138).

Section 3.1.1.2: Issue 2: Vehicle Damage to Natural or Cultural Resources. (p. 142)

Section 3.1.2.1: Issue 10: Regional Route Connectivity, (p. 143)



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

Section 3.1.5.5: Too Many Entrances Into the Park, (p. 151)  
Section 3.1.3.1: Issue 13; Connectivity to Habitat Corridors  
Section 4.5.3: GP Preferred Concept Route Changes (p. 185)  
Section 5.20.3: Project Impacts (p. 467)  
Non-Street Licensed Off-Highway Vehicle Use (p. 200)  
Also, see OHV use Goal 1 and Guideline 1-1  
Section 4.3.1 State Park Classification PRC 5019.53 (p. 154 & p. 157)

### **#5 ALLOWING OHV AT A PARK WITH STATE PARK CLASSIFICATION CONTRADICTS THE VERY DEFINITION OF THE PRIMARY GOAL OF A STATE PARK.**

**References:**

Chapter 4, EIR, The Plan, Section 4.2, RRCSP Purpose & Vision, Section 4.2.1, Declaration of Purpose; Also, Section 4.3.1, State Park Classification PRC 5019.53, (p.154 & p.157).

### **#6 THE PURPOSE OF THE 1994 DESERT PROTECTION ACT WAS TO PROVIDE MAXIMUM PROTECTION FOR SCENIC AND SCIENTIFIC VALUES.**

**References:**

Chapter 1 EIR, Introduction, Section 2.8.2, Regional Planning Influences (p.138); Also, Chapter 4, EIR The Plan, Section 4.2, RRCSP Purpose & Vision, Section 4.2.1, Declaration of Purpose, (p.138 & p.154)

### **#7 ESTABLISHED FEDERAL GOVERNMENT LAND MANAGEMENT PLANS INCLUDE RED ROCK IN PROTECTING RESOURCES WHICH CONFLICTS WITH ANY USE OF OHV AT THE PARK.**

**References:**

Section 2.8.2 Regional Planning Influences, (p. 138).

### **#8 TRAIL RIDING AND USE OF PRIMITIVE ROADS AS TRANSPORTATION CORRIDORS NOT ALLOWED UNDER GENERAL PLAN ADOPTED IN 1982**

**References:**

Chapter 1, Introduction, Section 1.2, Purpose of Land Acquisition, Also, Chapter 2, Existing Conditions, Section 2.4.1, Roads and Trails System, Access and Circulation (which also references Chapter 4, The Plan, Section 4.5.2) (p.23 & p.51), Red Rock Canyon State Park General Plan January 1982 (p. 24)

### **#9 OHV USERS ARE A SMALL FRACTION OF THE PARK VISITORS YET HAVE MAINTAINED A DISPROPORTIONATE INFLUENCE ON RED ROCK**

**References:**

Chapter 3, Issues & Analysis, Section 3.1.2.1: Regional Route Connectivity, (p.143).

### **#10 THE THREAT OF ILLEGAL AND POTENTIAL RETALIATORY ACTIONS DOES NOT JUSTIFY ALLOWING OHV ACCESS.**

**References:**

Chapter 5, EIR, Section 5.22.4.2, Cumulative Plans & Projects Considered in this Analysis, (p.146); Also, Section 5.23.2.2, Alternatives to the Proposed Plan (p.518)





## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

### **#12 AIR QUALITY CONCERNS NEED TO BE MORE CAREFULLY CONSIDERED AS TO POTENTIALLY SIGNIFICANT IMPACTS**

**References:**

Section 5.8.1.1: NAAQS, and CAAQS discussions. (p. 289)

Table 5.8-2 showing CAAQS non-attainment for PM10 particulates in Indian Wells Valley, just to the north of RRCSP (p. 292)

### **#13 NATURAL RESOURCES DESERVE MORE ATTENTION IN THEMES FOR INTERPRETATION.**

**References:**

Section 4.6.1.15 Interpretation and Education (p. 241)

### **#14 IF A DETAILED SUPPLEMENTAL EIR IS NEEDED IT CANNOT BE PIGGYBACKED ONTO A PREVIOUS PROGRAMMATIC EIR WHICH THIS GENERAL PLAN IS ASSERTING TO BE.**

**References:**

Chapter 1, Introduction, Section 1.9: Plan Organization (p.38): Also: Chapter 5, EIR, section 5.22.4.2: Cumulative Plans and Projects Considered in this Analysis (p. 496)

Chapter 1, Introduction, Section 1.9: Organization of the General Plan, and

Chapter 5: The Environmental Impact Report (p. 39):

***"The General Plan is considered a programmatic EIR that will inform decision-makers and the public about the environmental consequences of adopting the Revised Plan Concept consistent with the requirements of CEQA and its guidelines."***

Chapter 1 (p. 30)

***"The EIR for this General Plan serves as a first-tier EIR defined in Section 15166 of the CEQA Guidelines. The analysis of broad environmental issues found within **Chapter 5 – Environmental Impact Report** will be a reference for future environmental documents that will provide more detailed information and analysis for site-specific developments and projects."***

Chapter 1, Introduction, p. 33

Chapter 5 EIR, 5.1.1: Purpose, p. 265

Section 5.1.3 Subsequent Environmental Review Process (p. 266)

Chapter 5, EIR, section **5.2.1 Summary of Impacts and Mitigation**

***"However, State Parks can only speculate on the appropriate types, locations, and potential impacts of new facilities to meet these goals and accommodate future visitor needs. The General Plan includes a variety of new operations facilities, primitive camping sites, equestrian camping and facilities, reserves, etc. and proposed conceptual new trailheads, interpretive opportunities, picnic areas, and parking as shown in **Chapter 4 - The Plan**". Implementation of projects envisioned in the General Plan may require additional studies at the project level and may be subject to further environmental review. Implementation of the goals and guidelines contained in **Chapter 4 - The Plan**, along with compliance with applicable federal and state laws and regulations, avoids potential significant effects or maintains them at a 'less than significant' level, as described in the specific resource topics of this EIR. Additional mitigation measures are, therefore, not necessary."*** (p.267)

Chapter 5, EIR, section 5.23, Alternatives to the Proposed Plan

Section 5.6.1 Environmental Impact Analysis: (p.279)



## RED ROCK CANYON INTERPRETIVE ASSOCIATION COMMENT LETTER

*"This examination is based on the incremental change to the existing physical conditions that would result from the implementation of the General Plan and considers the public comments submitted by agencies and interested individuals during the 30-day public review period for the 2018 NOP (see **Appendix E** of this EIR for the Scoping Summary, including the NOP)."*  
Analysis of Project Impacts (p.280)

**#15 THERE SHOULD BE NO SEEDING OF PLANS TO COMBINE VISITOR CENTERS WITH ONYX RANCH SVRA. IT SHOULD ALSO BE STIPULATED THAT THE OPERATIONS AND FACILITIES OF RED ROCK INCLUDING OFFICES SHOULD BE FOCUSED SOLELY ON SERVING RED ROCK CANYON STATE PARK.**

**References:**

Facilities Guideline 2-1: *"Enhance existing Park visitor and operations facilities to become a more efficient, supportive, and sustainable shared visitor and joint operations and maintenance facility to serve the Park and adjoining Onyx Ranch SVRA, adapt to changes in visitor use and population demographics, and increase visitation."* (p.202)