

**CONSULTATION/
COORDINATION**



PUBLIC INVOLVEMENT

SCOPING PROCESS AND ISSUES AND ALTERNATIVES RAISED

Meetings, public workshops, and surveys were an integral part of the scoping process. The purpose was to identify all issues, alternatives, and impact topics that should be considered in planning and to keep the public informed throughout plan formulation. A notice of intent to prepare an environmental impact statement for the Joshua Tree general management plan and to begin scoping for that process was issued in the *Federal Register* on May 15, 1990.

The first formal public involvement was in May 1990, when public scoping meetings were held near Twentynine Palms and Joshua Tree, California, to seek input on planning issues from the public. The most common issues raised were:

- camping — availability of sites, tent only, tents and RVs, quiet areas, reservations, walk-in camping
- climbing — access, rests, belting
- horse use — trails, camping, water
- roads — access to sites, deterioration, speed limit, parking
- visitor use development — need for restrooms, information, patrol

In the summer of 1990 the government offices of San Bernardino and Riverside counties and the city of Twentynine Palms were asked to review an early draft copy of the document.

The California State Historic Preservation Office was provided an advance copy of this document for review.

Section 7 of the Endangered Species Act directs all federal agencies to use their authority to carry out programs for the conservation of endangered or threatened species. Federal agencies are required to consult with the U.S. Fish and Wildlife Service to ensure that any action authorized, funded, or carried out by the agency does not jeopardize the continued existence of listed species or critical habitat.

Informal consultation with the U.S. Fish and Wildlife Service was initiated in June 1990, with a request for a list of species that may be present in the project area or be affected by the project. One threatened species, the desert tortoise, and several candidate species were noted and are included in this appendix. Telephone consultations continued between resource management staff and the U.S. Fish and Wildlife Service as the project developed. Topics discussed included the status of the project as well as methods of population surveys and mitigation techniques that may be necessary. The U.S. Fish and Wildlife Service has reviewed this document.

Consultation with American Indian groups was initiated in November of 1990. The American Indian groups consulted were those who have had traditional seasonal territories (the Cahuilla, Chemehuevi, and Serrano), or trade routes (the Maricopa and Mojave) in or through what is now the park. They may maintain contemporary cultural interests in the land.

The American Indian concerns centered in four areas: (1) protection of sites in the park (2) sharing cultural resources information (3) properly consulting American Indian groups on finds of human remains and artifacts, on management plans, and on future exhibits, and (4) access to the park without restrictions on gathering traditional use plants. These concerns have been addressed in the general management plan and in ongoing programs.

American Indian consultations continued during the spring and summer of 1992 and culminated in the reburial and reclamation of human remains and associated artifacts. Over 60 persons participated in the sacred ceremonies, mostly representing the Cahuilla, Chemehuevi, and Mojave tribes.

On May 15, 1991, park representatives met with the Interagency Natural Areas Coordinating Committee, which is a group of federal, state, and local agencies involved in managing natural areas in the California Desert. Prior to their meeting, the National Park Service sent out background information to help participants understand the challenge the National Park Service faced with the draft general management plan, a questionnaire to evaluate the role and significance of the park in the California Desert region, and a proposed agenda for the meeting.

Issues discussed were:

- (1) the role of the other agencies in the California Desert region, i.e., the purpose of those agencies and the purpose of the areas they administer
- (2) the significant resources in the areas protected by other agencies in the California Desert
- (3) the kinds of activities available at the other areas and the problems associated with managing them
- (4) areas where cooperative planning and management between agencies can be used to more effectively manage resources and visitor activities

All of these issues are addressed in the general management plan.

In November 1991 two meetings were held to discuss road reconstruction. There was a proposal to include the dirt Queen Valley road as part of a paved one-way road. This proposal was dropped after the meetings. There was support for reconstruction of the roads on existing alignments. Impacts on the Joshua trees and desert tortoise were of concern. Parking was emphasized as a major concern. As a result of these meetings, the road reconstruction project was incorporated into the draft general management plan.

All of these issues are addressed under the goal to improve park circulation.

Informal meetings were held with members of key public interest groups in May of 1992 to discuss the alternatives in this document. Issues discussed at these meetings were primarily roads (same issues raised as in November 1991) and camping, both of which are addressed under the goals to manage visitation areas effectively and improve circulation.

RESPONSE TO THE 1994 LEGISLATION

An agreement has been reached within the Department of the Interior to approach planning and management of the 25 million acre California Desert region on an integrated ecosystem basis. The California Desert has been designated an official pilot project of the national performance review to demonstrate effective ecosystem management, planning, and agency reinvention efforts. Joshua Tree National Park will be an active partner in these multi-agency, multi-species ecosystem management plans. Geographically, Joshua Tree National park will be influenced by three ecosystem plans — the Northern and Eastern Colorado Desert coordinated Management Plan, the West Mojave Desert Coordinated Management Plan, and the Coachella Valley Habitat Conservation Management Plan.

AGENCIES, ORGANIZATIONS, AND PERSONS TO WHOM COPIES OF THE DOCUMENT HAVE BEEN SENT

Federal Agencies

Advisory Council on Historic Preservation
Department of Agriculture
 Forest Service
 Soil Conservation Service
Department of Defense
 Marine Corps, Twentynine Palms
Department of the Interior
 Bureau of Indian Affairs
 Bureau of Land Management
 Bureau of Mines
 Bureau of Reclamation
 Fish and Wildlife Service
 Geological Survey
 National Park Service
 Death Valley National Park
 Lake Mead National Recreation
 Area
 Western Archeological and
 Conservation Center
Department of Transportation
 Federal Aviation Administration
 Federal Highway Administration
Environmental Protection Agency

State Agencies

California Department of Fish and Game
California Department of Forestry
California Highway Patrol
California Parks and Recreation
California Office of the Governor
California Historic Preservation Officer
Native American Heritage Commission

Local Agencies

City of Cathedral City
City of Chiriaco Summit
City of Coachella
City of Indian Wells
City of La Quinta
City of Lake Tamarisk
City of Palm Desert
City of Palm Springs
City of Rancho Mirage
City of Salton City
City of Twentynine Palms
Los Angeles Metropolitan Water District
Town of Desert Center
Town of Yucca Valley

Organizations

Access Fund
Arizona Mountaineering Club
Audubon Society
Backcountry Horsemen of America
California Native Plant Society
Chamber of Commerce, Coachella Valley
Chamber of Commerce, Palm Springs
Chamber of Commerce, Palm Desert
Chamber of Commerce, Indio
Chamber of Commerce, Joshua Tree
Chamber of Commerce, Twentynine Palms
Chamber of Commerce, Yucca Valley
Chamber of Commerce, Desert Hot Springs
Coachella Valley Horsemen's Association
Coachella Valley Natural History Association
Desert Protective Council
Desert Tortoise Council
Eagle Mountain Energy
Hi Desert Museum
Living Desert Museum
Malki Museum
Morongo Basin Conservation Association
Morongo Basin Mounted Sheriff's Posse
National Parks and Conservation Association
National Wildlife Federation
Nature Conservancy
Palm Springs Desert Museum
San Diego Climbers for Access
San Diego County Trails Council
Santa Ana River Unit/BCHC
Sierra Club
 San Diego Chapter
 San Geronio Chapter
 Angeles Chapter
Southern California Edison Co.
Wilderness Society

Tribal Governments

Agua Caliente Band of Cahuilla Indians
Barona Band of Mission Indians
Cabazon Band of Mission Indians
Cahuilla Band of Mission Indians,
 Cahuilla Reservation
Campo Band of Mission Indians
Chemehuevi Indian Tribe
Colorado River Indian Tribes
Cuyapaipe Band of Mission Indians
Fort Mojave Indian Tribal Council
Inaja and Cosmit Band of Mission
 Indians
Jamul Band of Mission Indians
La Posta Band of Mission Indians
Los Coyotes Band of Mission Indians
Manzanita Band of Mission Indians
Mesa Grande Band of Mission Indians
Morongo Band of Mission Indians,
 Morongo Reservation
Pima-Maricopa Indian Tribal Council
Quechan Indian Nation of the Fort Yuma
 Reservation
Torres Martinez Band of Mission Indians,
 Torres Martinez Reservation
San Manuel Band of Mission Indians
San Pasqual Band of Mission Indians
Santa Rosa Band of Mission Indians
Santa Ysabel Band of Mission Indians
Soboba Band of Mission Indians
Sycuan Band of Mission Indians
Twentynine Palms Band of Mission
 Indians
Viejos Group of the Capitan Grande
 Band of Mission Indians

SUMMARY OF PUBLIC COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

A number of comments were received in letters and at public meetings following the release of the draft general management plan / environmental impact statement in August 1994. A notice of availability was published in the *Federal Register* (59 FR 43855) on August 25, 1994. Approximately 800 copies of the draft were distributed to government agencies, public interest groups, and individuals. The public comment period ended November 7, 1994.

Two public meetings were held in Joshua Tree and Palm Desert, California on September 14 and 15 respectively. The purpose of the meetings was to receive oral and written comments on the draft plan and environmental impact statement. Thirty people attended the meeting in Joshua Tree and eight people attended the meeting in Palm Desert. Many of the comments received during the meetings were reiterated in the written comments and are addressed in the following section. Other comments that required clarification, text corrections, or revision of the plan included:

Comment: A number of comments from hikers and equestrians pertained to trail use such as types, locations, lengths, and numbers of trails and placement of backcountry boards, boundary signs, and backcountry registration sites.

Response: These are details beyond the scope of the general management plan and will be addressed in the wilderness and backcountry management plan and proposed trails plan. The general management plan does call for the use of signs, small exhibits, and backcountry boards at entry points into the backcountry and wilderness to inform visitors of regulations and resource concerns in these areas.

Comment: There is a need for more parking areas along the Pinto Basin Road for backcountry access.

Response: Trailhead parking would be provided along this road and would be addressed during the latter phases of the road reconstruction project.

Comment: Better signs and parking for backcountry access along the park boundary are needed.

Response: A statement has been added in the "Parkwide Alternatives" section similar to what was contained in the development concept plan section. It states that the wilderness and backcountry management plan will evaluate trails and points of entry for hiking and backcountry use, and that the park would work with adjacent landowners to allow parking at wilderness access points where vehicle use and parking inside the park boundary would not be possible.

Comment: The plan prohibits vehicles over 20 feet long on Keys View Road. Allow horse trailers on the road to the backcountry board at the California Hiking and Riding Trail.

Response: In order to avoid widening Keys View Road and removing numerous Joshua Trees, the draft plan proposed to restrict vehicles over 20 feet long on this road beyond Cap Rock. The road curves that pose the greatest concern for safety of large vehicles are beyond

the California Riding and Hiking trailhead. This trailhead is a major stopping point and first available road junction for equestrians riding out of Covington. Consequently, the plan has been revised to state that there would be a posted advisory against use by vehicles over 20 feet beyond that trailhead (Juniper Flats backcountry trailhead). A pullout for measuring vehicles would be provided near that parking area.

Comment: Use of volunteers should be addressed in the plan.

Response: The plan has been revised to include that the park would actively support and encourage the use of volunteers.

Comment: The use of road numbers instead of names is unclear; parking area 1 is misplaced; and pullout totals in the "Visitor Use Areas" tables are incorrect.

Response: The plan has been corrected.

Comment: The general management plan and environmental impact statement should take into account impacts such as lighting, zoning, rural setting, visitor intrusions, on adjacent residents from building a visitor center at the west entrance.

Response: The plan has been revised to state that prior to a final decision on the placement of a visitor center near the west entrance, more alternative site evaluations and environmental impact analysis would be completed. See written responses regarding placement of proposed visitor centers.

One hundred and forty-four comment letters were received from government agencies, interest groups, and individuals during the comment period. All letters from government agencies and interest groups are reprinted at the end of this section. Also included are reprints of letters from individuals that raised points needing clarification, that resulted in text corrections or modifications of the proposal, or that were chosen to represent the range of issues included in the individual letters. No responses are provided to comments that only expressed opinions and did not identify a needed text clarification, correction, or modification.

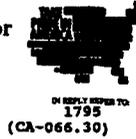
COMMENTS

RESPONSES



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Palm Springs -- South Coast Resource Area
63-600 Garnet Avenue
Post Office Box 2000
North Palm Springs, CA 92258-2000



SEP 2 - 1994

Earnest Quintana,
Superintendent
Joshua Tree National Monument
74485 National Monument Drive
Twentynine Palms, CA 92277

Dear Mr. Quintana:

Thank you for the opportunity to comment on the Draft General Management Plan and Environmental Impact Statement for the Joshua Tree National Monument. We offer the following comment:

1a

Page 22, last paragraph. The proper name for the Big Morongo preserve is the Big Morongo Canyon Area of Critical Environmental Concern. The proper name for the fringe-toed lizard preserve is the Coachella Valley Fringed-Toed Lizard Preserve and Area of Critical Environmental Concern.

If you have any questions, please contact Elena Misquez at (619) 351-4826. Thank you.

Sincerely,

Julia Dougan
Area Manager

1a. The plan has been revised to correct the names for these areas. 2a. The plan has been revised to correct the names for these areas.

COMMENTS AND RESPONSES

COMMENTS

RESPONSES



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
 Palm Springs — South Coast Resource Area
 63-500 Garnet Avenue
 Post Office Box 2400
 North Palm Springs, CA 92268-2400

NOV 14 1984

Stan Albright
 Regional Director
 Western Regional Office
 National Park Service
 600 Harrison St., Suite 600
 San Francisco, CA 94107-1372

Re: JOSHUA TREE NATIONAL MONUMENT - Draft General Management
 Plan, Development Concept Plans & EIS

Dear Mr. Albright:

We have reviewed the Draft General Management Plan and EIS for Joshua Tree National Monument and would like to provide you with the following comments:

1) In the Chapter, Alternatives, Including the Proposed Action discussed on page 22, the issue of Backcountry/Wilderness Management is addressed. Insofar as BLM administered lands are adjacent and in close proximity to Park Service boundaries, we welcome and support your planned action to pursue cooperative agreements with other agencies and landowners to protect ecological units which extend beyond the monument boundary which still have natural integrity. However, in delineating those areas along the Monument's southern and western boundary, incorrect descriptions or designations were given in the draft document. The areas as listed in the draft plan should be correctly designated as follows:

- a. Big Morongo Canyon Area of Critical Environmental Concern (ACEC).
- b. Coachella Valley Fringe-toed Lizard Preserve and ACEC.
- c. The Desert Lily Sanctuary.

RECEIVED	NOV 17 1984
Western Regional Office	(951-366-35)
Regional Director	
Dep. Dir.	
Operations	
Res. Mgmt. & Planning	
Administration	
Operations Eval.	
Public Affairs	
ED	
Budget	
Action Taken	

2a. The plan has been revised to correct the names for these areas.

2a

COMMENTS

RESPONSES

- 2b

2) Also, in terms of overall plan coordination and cooperative management opportunities, two BLM planning efforts are underway which have a direct ecological relationship to the Monument. These plans are the West Mojave Coordinated Management Plan; and, the Northern and Eastern Colorado Desert Coordinated Management Plan, both of which are regional planning efforts driven by concerns for desert tortoise. Additionally, for your information, the Coachella Valley Association of Governments (CVAG), is leading an effort, in consultation with the U.S. Fish & Wildlife Service and the California Department of Fish & Game to develop the Coachella Valley Multi-Species Habitat Management Plan. With 234,000 acres of new lands which were added to the newly designated Joshua Tree National Park, under the provisions of the recently passed California Desert Protection Act of 1994, opportunities for enhanced planning coordination and cooperative management may be relevant to your needs.
- 2c

3) In light of the recent passage of the California Desert Protection Act, the assumption is positively made that the draft plan document will be revised to reflect designated new parklands and wilderness areas and the transition from National Monument to a National Park. Also, under the new legislation, we may find new opportunities for information sharing, interpretation and outreach efforts which could be merged or jointly funded and staffed for purposes of inter-agency coordination and public benefit. We would appreciate and encourage the presentation of user information for adjoining lands managed by the BLM and other agencies.
- 2d

4) On page 50 under the section on Plan Implementation, it is not clear what priority, if any, will be given to development of interpretive facilities or a visitor center. Also note, under the fifth priority the need for "additional interpretive signs" (sic) signs.
- 2e

5) For the Covington Planning Unit, there appears to be no mention of the planned trail from Desert Hot Springs, across BLM land, and into the Park.
- 2f

Overall, the draft document does a good job of presenting management alternatives and their potential effects. We support the proposed action alternative bringing an appropriate level of management attention and visitor services to an area of outstanding resource values. We truly appreciate the opportunity

- 2b. Two of the primary management goals for the park are (1) to facilitate cooperative planning throughout the California Desert ecosystem with other public agencies and communities and (2) to participate cooperatively in the preservation of ecological units that extend beyond the park boundary. The plan has been revised to include these regional planning initiatives and their relationship to this general management plan.
- 2c. The plan has been revised to the reflect the change of status from monument to national park and the addition of 234,000 acres. Specific management guidance for management of the new land will be addressed by the Wilderness and Backcountry Management Plan that is in preparation.
- 2d. The Park Service supports efforts to enhance interagency coordination and cooperative information and interpretation programs. The plan has been revised to further reflect this direction, including evaluation of the development of interagency visitor centers at the west and south entrances.
- 2e. First priority projects include actions at the west and north entrance, which include the new visitor center near the west entrance and improvement of the north entrance (Twentynine Palms) visitor center. Second priority projects include development of the south entrance visitor facility. Further identification of project priorities is given in appendix A.
- 2f. The plan has been revised to note that the park is working with the city of Desert Hot Springs and the Bureau of Land Management on the preparation of a regional trails plan that includes a proposal for trail access into the park from Desert Hot Springs. 3a. USFWS

COMMENTS

RESPONSES

3

to comment on the Draft General Management Plan and EIS for
Joshua Tree National Monument.

Sincerely,



Julia Dougan
Area Manager

cc: Ernie Quintana
Superintendent, JTNM

COMMENTS

RESPONSES

01/16/98 09:34 415 744 3632 NPS WRO STN FILE --- DENVER SVC CTR 002/003



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Carlsbad Field Office
2730 Leifer Avenue West
Carlsbad, California 92008

November 1A, 1994

MEMORANDUM

To: Regional Director, Western Regional Office
National Park Service
From: Acting Field Supervisor
Subject: Draft Environmental Impact Statement, General Management Plan and Development Concept Plan for Joshua Tree National Monument

The Fish and Wildlife Service (Service) received your request for comments on the above mentioned document(s) on August 20, 1994. Unfortunately, the cover of the document did not indicate that it was a draft and it was therefore set aside due to other obligations. Please accept our comments at this time.

General Comments

It is the Service's understanding that the proposed action is the adoption of the General Management Plan and that it is the goal of the General Management Plan to minimize disturbances to resources while maintaining existing visitor activities and services. It is also the Service's understanding that day use capacity would be expanded in some areas and that opportunities for wilderness and trail experiences would be expanded. The Service supports the proposed action as described in the document provided that significant impacts to natural resources do not occur as a result of the action.

From the standpoint of the National Environmental Policy Act, and the Endangered Species Act (ESA), the Service cannot concur that the proposed action would not have an adverse affect on desert tortoise. The reason for this conclusion is the indirect effects roads and their use can have on this species. Where roads pass through habitat occupied by desert tortoise, negative impacts (vehicle strikes, unauthorized handling, unauthorized releases of desert tortoise, etc.) should be expected.

As use of Joshua Tree National Monument increases, the incidence of vehicles accidentally striking desert tortoise and other species is expected to increase. The National Park Service should begin identifying areas where conflicts between desert tortoise and vehicles occur or are likely to occur. In addition, some assessment of conflicts between desert tortoise and vehicles needs to be completed to take into consideration where conflicts were likely to have occurred in the past. The suitability of adjacent habitat may shed some light on this issue. Once areas are identified where impacts to desert tortoise are likely, measures need to be developed and implemented to reduce the potential for desert tortoise and other wildlife mortality.

If any activity of the National Park Service may affect a listed species,

3a. A letter was forwarded to the U.S. Fish and Wildlife Service after further informal consultation with that agency regarding desert tortoise issues in the plan. The U.S. Fish and Wildlife Service concurred that the inclusion of the following measures in the plan would be adequate to address their concerns at a programmatic level. The Park Service would again consult with the U.S. Fish and Wildlife Service during preliminary design for all construction projects to ensure compliance with the Endangered Species Act. The following is an excerpt from the letter to U.S. Fish and Wildlife Service:

In response to your letter commenting on the draft general management plan for Joshua Tree National Park, the National Park Service will be preparing additional NEPA compliance documents, most likely environmental assessments, for all future construction projects as they are funded and designed. At that time, the National Park Service will have adequate details for the proposals and any impacts they may have, as well as alternative evaluation as required by NEPA. Surveys will be completed in areas of tortoise habitat that may be affected by construction, and there will be further consultation with the U.S. Fish and Wildlife Service to ensure compliance with the Endangered Species Act.

To establish baseline data, the National Park Service will continue to survey areas of tortoise habitat and monitor road mortality, especially in areas of high density. Mitigation measures will be developed as appropriate during future road design. In addition, the National Park Service will use various park media -brochures, park newspaper, etc - to inform park visitors about the tortoise and the impacts of unauthorized tortoise releases in the park.

All of this information will be incorporated into the final general management plan. Thank you for your comments.

3a

Comments and Responses

COMMENTS

RESPONSES

01/18/95 09:35 418 744 3932

NPS WRO STE FLR --- DENVER SVC CTR @003/003

2

consultation under section 7 of the ESA is required. If an action is likely to adversely affect a listed species, either directly or indirectly, formal consultation is necessary. The results of formal consultation would be the development of a Biological Opinion by the Service.

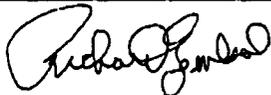
Based on information contained in the document, formal consultation appears to be warranted. Prior to formal consultation, direct impacts to suitable desert tortoise habitat need to be quantified. Potential activities that may adversely affect desert tortoise also need to be identified, and quantified as appropriate. Once all direct and indirect impacts are identified, appropriate mitigation measures need to be developed. It is important to note that the current general use of facilities within Joshua Tree National Monument, where activities may affect desert tortoise, should be consulted on. Where these activities would likely adversely affect desert tortoise, formal consultation should be initiated following the development of adequate information to support such consultation.

Specific Comments

On page 14, where other Monument plans, studies, and proposals are briefly described, a discussion of the Monument's Fire Management Plan needs to be included. In addition, if there are any other plans that would affect the natural environment, they need to be briefly discussed as well.

In closing, the Service supports the Monument's preferred alternative provided that measures are taken to minimize impacts to desert tortoise and other sensitive species and habitats within Joshua Tree National Monument. In addition, a programmatic consultation would probably be the best approach for the National Park Service to take in meeting its obligations under section 7 of the ESA. If you have any questions regarding this letter please contact Arthur Davenport of this office at (619) 431-9440.

(1-6-95-I-048)



5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

78 Hawthorne Street
San Francisco, Ca. 94108-3901

October 24, 1994

Stanley T. Albright
Regional Director
Western Regional Office
National Park Service
600 Harrison St., Suite 600
San Francisco, CA 94107-1375

Dear Mr. Albright:

The Environmental Protection Agency (EPA) Office of Federal Activities has reviewed the draft General Management Plan/Development Concept Plans and Environmental Impact Statement for Joshua Tree National Monument, California. We are submitting the following comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations implementing NEPA (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

In the Draft General Management Plan/EIS the National Park Service examines two alternatives, along with continuation of existing management (no action), to improve resource protection and visitor opportunities at Joshua Tree National Monument over the next 10 to 15 years. The alternatives, which are described at two levels of detail (Monument-wide and by planning unit), address management policies for natural and cultural resources, and plans for visitor use facilities, roads and parking, and administrative facilities. All alternatives, including "no action," would entail upgrades of the existing road system and parking. In addition the two action alternatives would reassess backroad status in preparation for some closures and revegetation. The preferred action alternative provides a more ambitious program of expanded visitor facilities (such as campground improvements and interpretive exhibits) than the "minimum requirements" alternative.

In many respects the proposed actions in the alternatives are stated generally, and the impact assessment for the General Management Plan is correspondingly general. Site specific implementation of measures identified in the Plan (road realignments, closures, facilities designs, and the like) will in many cases depend on subsequent planning. The Plan/EIS also mentions that certain issues which are not covered in this document, such as abandoned mine lands, will be addressed in more detailed plans and studies (pp. 14-16). More detailed analysis of impacts on biological resources, air quality, water, and other

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COMMENTS

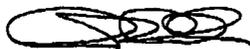
RESPONSES

aspects of the environment would be possible at these later planning stages.

With the understanding that more specific plans, and appropriate NEPA compliance, will be necessary to implement many of the measures proposed in the General Management Plan, we have rated this Plan/EIS LO-1 (Lack of Objections-- adequate impact documentation; see attached rating sheet). We believe that the Plan/EIS provides promising direction for future management within Joshua Tree. We note that with the likely national park designation for the Monument (assuming the California Desert Protection Act is signed) some management issues may be affected. In the attached detailed comments we have suggested expanding the discussion on this change in status; we have also identified some topics for clarification in the Final EIS.

We appreciate the opportunity to review the Plan/EIS. Please send a copy of the Final EIS to this office when the document is officially submitted to EPA Headquarters. If you have any questions, please call me at 415-744-1574, or contact Carolyn Yale at 415-744-1580.

Yours truly,



David Farrel, Acting Chief
Office of Federal Activities

id: 002266

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTIONEnvironmental Impact of the ActionL/Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for the application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

MC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EQ-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact StatementCategory 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3- inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

COMMENTS

RESPONSES

EPA COMMENTS:
NATIONAL PARK SERVICE, JOSHUA TREE NATIONAL MONUMENT
GENERAL MANAGEMENT PLAN/DEVELOPMENT CONCEPT PLAN/EIS OCTOBER 1984

General comments:

1. The General Management Plan/EIS is described as providing a framework for more detailed plans and studies, including land protection, abandoned mine lands, backcountry management, and trails (pp. 14-16). A number of important issues (nonfederal lands in the monument, adjacent land uses, water leaching from abandoned mines, for example) are not covered in the General Management Plan but are deferred to these more detailed plans. However, the Plan/EIS is vague about the schedule for these

plans. If possible, the Final EIS should state when these plans will be revised or developed, and should clarify whether the National Park Service intends to tier NEPA documents for these plans from the General Management Plan/EIS.

2. As the General Management Plan/EIS notes briefly (p. 16), the California Desert Protection Act would expand the size of the monument by roughly 100,000 acres (chiefly on the southern side) and establish Joshua Tree as a national park. Given likely signing of the legislation, we suggest that the Final EIS explain whether these changes would affect the management priorities identified in the Plan or introduce significant new resource management issues. The Final EIS should explain how planning for the new areas would be integrated with this General Management Plan.

3. It appears that limited water supply is an issue which is not confronted directly in the Plan/EIS. Clearly, a number of visitor facilities are not supplied with water. The Plan/EIS also mentions that discharges in some of the springs are decreasing, although the cause(s) have not been determined. The Plan/EIS states that the 1993 "Resource Management Plan" directs the Service to develop a plan to protect monument water rights,

and to acquire rights for additional supplies, as needed. We believe this is an important issue and suggest that the Final EIS provide more information on the status of plans to protect and secure water. To what extent does neighboring development rely on supplies (such as ground water) which could affect water availability and water-dependent resources within the Monument itself?

Detailed comments:

4. The Final EIS should provide a summary table listing quantified features, including parking (spaces), roads upgraded (miles), and campground facilities, for the three alternatives and existing conditions. Currently this information is scattered

- 4a. As indicated in the draft plan, implementation plans would be revised or developed following completion of the GMP process. The Interpretive Prospectus and Wilderness and Backcountry Management Plan are in preparation. The plan has been revised to clarify that NEPA documents for these plans would tier from this general management plan / environmental impact statement.
- 4b. The plan has been revised to explain that the land added to the park in 1994 would be addressed in the Wilderness and Backcountry Management Plan, which would initiate further surveys and identify any additional issues pertinent to the management of the new land. The Wilderness and Backcountry Management Plan would serve as an amendment to the general management plan and would include a separate public involvement process and environmental impact statement.
- 4c. In general, water resources would continue to be evaluated by the Resources Management Plan, which is reviewed annually. The plan has been revised to note that ground and surface water conditions at the Oasis of Mara would be monitored. Studies of the hydrogeology would be undertaken in order to understand the groundwater system that supports the oasis and impacts to that system. The park would continue to provide supplemental water to maintain the oasis until such studies were completed. The Park Service is also monitoring the status of state water rights adjudications that may affect water basins in the park.
- 4d. The number of parking spaces and miles of road that would be reconstructed under each alternative has been added to the Summary of Alternatives table.

COMMENTS

RESPONSES

EPA COMMENT:
NATIONAL PARK SERVICE, JOHUA TREE NATIONAL MONUMENT
GENERAL MANAGEMENT PLAN/DEVELOPMENT CONCEPT PLAN/818 OCTOBER 1984

throughout the text.

4e

5. Explain in the Final EIS how information in this Plan will be used to guide decisions regarding land acquisition in the "management zones." Quantify the current zoning designations (see p. 68).

4e. The draft plan states that the land protection plan would be revised to incorporate a proactive program for acquisition from willing sellers of all private inholdings within the natural zone. The current zoning designations are based on the last master plan for the park and have been added to the document.

COMMENTS

RESPONSES

The Resources Agency

Pete Wilson
Governor



of California

Douglas P. Wheeler
Secretary

California Conservation Corps • Department of Boating & Waterways • Department of Conservation
Department of Fish & Game • Department of Forestry & Fire Protection • Department of Parks & Recreation • Department of Transportation
November 4, 1994

U. S. Department of Interior
National Park Service
ATTN: Stanley Albright
600 Harrison Street Suite 600
San Francisco, CA 94107-1372

RECEIVED 11/14/94	
Western Regional Office	
Regional Director	
State Water Resources	
Operations	
State Mgmt. & Eval.	<i>EW</i>
Administration	
Operations Eval.	
Public Affairs	
EO	
Records	
Action Taken	

Dear Mr. Albright:

The State has reviewed the General Management Plan, Development Concept Plans, Environmental Impact Statement, Joshua Tree National Monument, Riverside and San Bernardino Counties, submitted through the Office of Planning and Research.

We coordinated review of this document with the Native American Heritage and State Lands Commissions, the Colorado River Basin Regional Water Quality Control Board, and the Departments of Conservation, Fish and Game, Parks and Recreation, and Transportation.

The Department of Transportation's Districts have submitted the attached comments for your consideration.

Thank you for providing an opportunity to review this project.

Sincerely,

for James T. Burroughs
Deputy Secretary and General Counsel

Attachments

cc: Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814
(SCH 94094005)

The Resources Building Sacramento, CA 95814 (916) 653-5656 FAX (916) 653-6102

California Coastal Commission • California Tahoe Conservancy • Colorado River Board of California
Energy Resources Conservation & Development Commission • San Francisco Bay Conservation & Development Commission
State Coastal Conservancy • State Lands Commission • State Reclamation Board

COMMENTS

RESPONSES

State of California

Business, Transportation and Housing Agency

Memorandum

To : MR. MICHAEL CHIRIATTI, JR.
State Clearinghouse
Office of Planning & Research
1400 10th Street
Sacramento, CA 95814

Date : October 18, 1994
File No.: 08-SBd-62-18.2/31.2
SCH# 94094005

From : DEPARTMENT OF TRANSPORTATION
District 8

Subject: Joshua Tree National Monument, Draft General Management Plan,
Development Concept Plans, Environmental Impact Statement

We have reviewed the above-referenced document and request consideration of the following comments:

5a

• The report proposes various improvements to the monument visitor facilities, which infers increased visitor use, yet the impacts of this greater use are not addressed on the State and regional transportation facilities. Of particular concern to Caltrans, are the impacts on State Route 62 and intersections which access the monument facilities.

5b

• A traffic study is needed for this project and should include the following from a worst case viewpoint: existing and future average daily traffic (ADT) volumes, traffic generation (including peak hour), traffic distribution, analysis of peak hour demand and capacity using delay methodology for intersections along with current and projected capacities of local roads, state highways and freeways that might be impacted.

5c

• Discussion of the impacts should also include traffic safety and any impact associated with the construction, maintenance, and operation of any anticipated highway improvements. In addition, the report should list the funding source of any potential improvements to the State highway.

5a. The plan does not propose major expansion of visitor use facilities that would significantly affect traffic to the park. A separate study and environmental impact analysis would be done for the proposed visitor facilities that would be located near the west and south entrances to the park. Impacts on traffic flow or intersections that could be affected by facility locations would be evaluated as part of that analysis.

Traffic congestion on state routes and at intersections that provide access to the park is not a problem at this time and was not identified as an issue during the scoping process for this plan. However, traffic will probably increase as visitation to the park and recreation visits to public land in the southern California Desert region increase. Growth in surrounding communities will also increase traffic. The plan has been revised to note that this cumulative growth in traffic could lead to increased traffic congestion and decreased safety on roads leading to the park.

5b. See response 5a. A detailed traffic analysis does not appeared warranted at this time.

5c. See response 5a.

COMMENTS

RESPONSES

MR. MICHAEL CHIRIATTI, JR.
October 18, 1994
Page 2

When available, we would like to receive the Traffic Study, Notice of Determination, Final Environmental Impact Statement, Conditions of Approval, the date of any public hearing on this project, and any prepared or future document relative to development within the Monument. Please send this information to:

Maisoon Afaneh
Transportation Planning, CEQA/IGR
California Department of Transportation
P.O. Box 231
San Bernardino, CA 92402

If you have any questions, please contact Maisoon Afaneh at (909) 383-5928 or FAX 383-7934.

Maisoon Afaneh

HARVEY J. SAWYER, Chief
Office of San Bernardino
County Transportation
Planning

LS:cl

COMMENTS

RESPONSES

State of California

Business, Transportation and Housing Agency

Memorandum

To: N. GAYOU
Department of Water Resources

Date: October 31, 1994

File: 11-RIV-010
R 81.5

From: DEPARTMENT OF TRANSPORTATION
District 11 Planning

Subject: Caltrans District 11 Review of the FIS for Joshua Tree National Monument SCH-94094005

District 11's question is as follows:

5d

- What will be the traffic impacts at the Interstate Route 10 interchange at Box Canyon and Cottonwood Springs Roads?

Our contact person is Suzanne Lahitte, Project Engineer, Project Development North, (619) 688-6458.

BILL DILLON, Chief
Planning Studies Branch

BD/MO:ce

5d. See response 5a.

COMMENTS

RESPONSES

NOV-07-1994 15104

NAT'L PARKS & CONS ASSOC.

510 835 4441 P.02



National Parks
and Conservation Association



PACIFIC REGIONAL OFFICE

5 November 1994

Stanley Albright
Western Regional Office
National Park Service
600 Harrison Street, Suite 600
San Francisco, CA 94107-1372

RE: DRAFT GENERAL MANAGEMENT PLAN, DEVELOPMENT CONCEPT PLANS
AND ENVIRONMENTAL IMPACT STATEMENT - JOSHUA TREE NATIONAL
PARK

Dear Stan:

The National Parks and Conservation Association (NPCA) is pleased to respond with comments to the above referenced document. As you know, NPCA is the only private non-profit citizen organization dedicated solely to protecting, preserving, and enhancing the U.S. National Park System. We have 450,000 members nationwide, including more than 90,000 in California.

First of all, we would like to recognize the efforts of the preparers of the this document. On the whole, it correctly addresses the difficulties Joshua Tree NP faces under its present management systems and lack of adequate visitor facilities. Joshua Tree, like most units of the National Park System, is suffering under the demands of ever increasing visitorship. Without the recommended improvements to visitor facilities and basic operational systems, we can expect an increase in the degradation of the resource, an increase in user conflicts, and an overall diminishment of the visitor experience.

For this reason, we urge the Park Service to adopt Alternative A - the Proposed Action. It most fully addresses the threats facing Joshua Tree and will supply the park with the tools and resources necessary for protecting this unique resource. We commend its proactive approach to problem solving in proposing management systems that will reduce the impacts of increasing visitation. An additional component outlining the research and process for determining the park's visitor carrying capacity is required, however. Without this information, the park cannot adequately plan for future visitor management needs.

Our specific comments follow.

Pacific Regional Office
P. O. Box 1289, Oakland, CA 94604-1289
Tel: (510) 839-9922 • Fax: (510) 835-4441

National Office
1776 Mass. Ave., N.W., Washington, D.C. 20036
Tel: (202) 223-6722 • Fax: (202) 659-0630

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COMMENTS

RESPONSES

NOJ-87-1994 15185 NAT'L PARKS & CONSERV. ASSOC. 510 635 4441 P.83

National Parks and Conservation Association 2

General Comments

National Park Authorization: The plan only briefly mentions the newly legislated boundaries which adds some 230,000 additional acres to Joshua Tree. We appreciate that the new lands are for the most part designated wilderness and, therefore, do not appreciably alter management strategies. Note the less, the plan should be amended to account for the new additions and a survey be done to identify previously unknown management concerns. We also feel that the existing threat of a landfill at Eagle Mountain, though outside the park, should be viewed as a management issue necessary of treatment in the GMP (see also Pg. 5).

Preservation of the Resource

The General Management Plan is the basis for all management decisions in the park. As such, its guidance must be reflective of the enabling legislation, the Organic Act and all other federal laws regulating resource protection. Joshua Tree is further bound as a United Nations Biosphere Preserve to protect its lands as an ecosystem of significant importance to understanding human impact on the planet. Any action undertaken by the park must be held up against the principles of preservation required by these national and international mandates. It follows, then, that the purposes of and goals for management of Joshua Tree, as articulated in the GMP, set forth the highest possible standards of resource preservation. We offer the following suggestions:

Purposes of the Park: (pg. 8) The stated purposes for Joshua Tree NP should incorporate the standards set forth in Organic Act of 1916 and state that the "natural and cultural resources of the Colorado and Mojave deserts are to be preserved unimpaired so that they can be interpreted, understood and enjoyed by present and future generations."

Interpretive Themes: (pgs. 9-10) In reference to the above, the interpretive themes should reflect this mandate. As part of interpreting the desert, visitors should be instructed in the ethics and methods necessary for enjoying the park while leaving no trace of their visit. Increasing visitation will, necessarily, create impacts on the park. Programs which create a partnership between visitors and the Park Service for the preservation of the resource are the most effective way to keep impacts at a minimum.

Management Goals: (pg. 10) The management goals must reflect this mandate as well. As a management document, the GMP must give more guidance to staff than to simply "manage the lands and wilderness more effectively." We urge the language direct park actions from the stated purpose of preserving the lands and wilderness values unimpaired.

User Conflicts: (pg.12) We support the plan's emphasis on resolving user conflict within the park. It would be helpful to articulate the specific nature of these conflicts and how modification of the visitor facilities and interpretive direction will work to alleviate the problems. Development of interpretive materials educating visitors on how to avoid conflicts would also be appropriate.

- 6a. See response 4b.
- 6b. This landfill and potential impacts from its operation have been identified in the "Planning Issues and Management Concerns" and "Affected Environment" sections of the plan. Because the Park Service has no authority to prohibit or control commercial development outside the park, the plan proposes a general strategy to address this issue as well as other issues dealing with adjacent land use. The National Park Service would work with adjacent property owners and local, county, state, and federal officials to identify the park's resource concerns. The Park Service would review, evaluate, and make recommendations to local governments concerning all proposals or developments or activities that might affect park resources. These evaluations and recommendations would be specific to each development proposal outside the park.
- 6c. The plan has been revised to reflect this purpose and include the "preserved unimpaired" language.
- 6d. The interpretive themes have been revised to include a statement on the "leave no trace" ethic.
- 6e. The first management goal has been revised to "manage land and wilderness to preserve them unimpaired for future generations."
- 6f. The parkwide alternative section describes the general strategy for dealing with the primary user conflicts and congestion in the Lost Horse planning unit, which is the most popular area of the park. The development of improved visitor contact facilities at the three main park entrances and a completely redesigned wayside exhibit system would orient visitors and provide information about resource features and various visitor activity options. This, along with improvements in the roads, parking, and trails systems and availability of road and trail guides would help distribute visitors throughout the area and the park. More specific visitor conflicts are noted in the development concept plan sections where proposed actions to address these conflicts are further described.

COMMENTS

RESPONSES

NA-67-1994 12-85 NATIONAL PARKS & CONSERVATION ASSOC. 510 835 4441 P.84
National Parks and Conservation Association 3

Unfortunately, some user conflicts exist simply as a function of the number of visitors in the park. The park must prepare for the day visitation levels interfere with the park's visitor experience and resource protection objectives. Working with scientists, NPCA has developed an eight step program for determining carrying capacity. This framework along with the relevant research can be found in the two volume *Visitor Impact Management* and is available from our office.

Mountain Bikes: There is little mention of mountain bike management in the plan. While not prevalent as of yet, we can assume that the growth of this recreational activity will eventually reach Joshua Tree. If establishing guidelines for trail use by bicycles is not appropriate in the General Management Plan, we ask that the plan include a description of the process by which they will be created.

Equestrian Use: The use of horses in Joshua Tree is another case where planning can prevent an increase in conflicts between equestrian and trail users. The park should utilize its already positive relationship with the variety of horse user groups to establish and implement a horse management plan.

Alternative A - Proposed Action

Resource Management: We look forward to an integrated approach to management of cultural and natural resources. We would like to see a broader description of how this would be accomplished. The key points of this planning process should be articulated in the General Management Plan so as to provide managers appropriate direction.

Native American Consultation: We applaud the Park Service on its proposal to work closely with the Native American community as is outlined in the plan. We encourage full implementation of this consultation process regardless of the alternative chosen. In addition, we recommend that the current use of traditional sacred sites by Native Americans be given appropriate consideration in the plan's approach to the resolution of user conflicts.

Historic Structures: Joshua Tree has been set aside to preserve the natural and cultural resources within the park. Any management decisions which consciously allow for the deterioration of a resource must be based on sound interpretation of the laws promulgated for its protection. While we cautiously agree that some historic structures may be suited for natural deterioration, the GMP should outline a more complete listing of the criteria used in determining such a recommendation. The plan should include a statement of policy by which buildings are classified along with supporting documentation from the Cultural Resource Plan and NPS-28, Cultural Resources Management Guideline. Additionally, the table on pages 28 and 29 should include supporting evidence for the recommended treatment.

Visitor Use/Interpretation: With its proximity to millions of school age children, Joshua Tree represents a significant opportunity for environmental, National Park and natural and cultural history programs. Included in the objectives for the interpretation program should be the development of park-related curriculum for classrooms. Through this curriculum teachers of all levels would become allies of the park in the achievement of its interpretive goals.

- 6g. The plan proposes a connected network of roads, trails, parking areas, and shuttle routes to serve various visitor destinations in the most heavily used area of the park. Visitors who could not find a parking space in a lot closest to their destination could park further away but would have the option to hike, bike, or take a shuttle to their destination. As a means to improve visitor circulation in this busy area, bicycle use on designated roads would continue to be allowed as would the use of some trails. A trails plan would provide specific guidance on the layout of the interconnecting trails system and would determine which trails would be most appropriate for bicycle use based on the terrain and resource, visual quality, and visitor use concerns. The Wilderness and Backcountry Management Plan would address the use of mountain bikes in the backcountry outside of wilderness.
- 6h. The park currently has a horse management plan, which would be reviewed and updated following completion of the general management plan and Wilderness and Backcountry Management Plan.
- 6i. The plan has been revised to elaborate on this management approach.
- 6j. Although the no-action alternative does not take a proactive approach in developing a Native American consultation plan, it would meet legal requirements for consultation. This would be a continuation of existing conditions. No visitor conflicts with traditional sacred sites were identified during the planning process. If conflicts were to arise in the future, park management would address these concerns in accordance with all applicable laws and Park Service policy.
- 6k. A more complete outline of the criteria used in determining the recommendations for all the historic structures has been added to the plan. Applicable laws, regulations, and guidelines that pertain to properties and sites listed on, or that may be determined eligible for listing on, the National Register of Historic Places is contained in appendix B.
- 6l. The plan provides guidance to the interpretive program, including an objective to provide educational programs for school groups in the region. Specifics on how to achieve this objective, such as development of park-related curriculum for classrooms, is a detail beyond the scope of this general management plan.

COMMENTS

RESPONSES

NOV-87-1994 13:06 NHTL MARKS & CONS ASSOC. 518 835 4441 P.05
National Parks and Conservation Association 4

6m **Visitor Facilities:** NPCA supports the Park Service's foresight in retaining the current capacity for overnight camping. As noted in the plan, visitorship will continue to grow in the coming years. It would be ill-advised for the park to begin a trend of increasing campground capacities based on future demand. This slippery slope approach can never hope to accommodate the ever increasing number of visitors and will only serve to push development into sensitive areas. We also agree that visitation will probably exceed the capacity of park facilities in the coming years. The GMP, therefore, should include an outline of the plan by which the park will help facilitate off-site camping opportunities. Potential working relationships with both private operations and the BLM should be articulated.

6n **Roads/Circulation:** The development of shuttle routes for high congestion areas of the park is an important aspect of the plan. Cooperation should be sought within the climbing and trail-user communities to help encourage the use of such a system, thereby reducing the amount of parking needed for longer term park visits. Accordingly, shuttle schedules should provide for higher levels of use in mornings and late afternoons, as visitors enter and leave the park.

6o **Monument Operations/Sustainable Design:** The desert provides a prime setting for the utilization of sustainable architecture and design. NPCA obviously supports the use of these technologies to the fullest extent practical. We agree that the siting of a visitor center in the Pinto Basin would constitute an unwarranted impact, though believe that elements of the proposed design can and should be incorporated into the development of a visitor center at the West Entrance. Specifically, a partly subterranean design would blend into the surrounding area, creating less visual disturbance to the viewshed. The up-front costs associated with construction of this type would be recaptured through greatly reduced heating and cooling requirements. These sustainable design elements should also be incorporated into interpretive materials, explaining the environmental benefits of appropriate technology.

Development Concept Plans

6p **Covington Planning Unit:** The redesign of Black Rock campground and removal of the tennis courts is an excellent start in rehabilitating this area. This facility is in serious disrepair due to its years as "Jellystone." Beyond redesign, however, much of the area surrounding the campground requires serious restoration work. This element should also be noted in the plan. This, along with the development of the nature/environmental education center, will be a vast improvement over the existing facility.

6q **Lost Horse Planning Unit:** The Key's Ranch seems to illustrate the NPS paradox of leaving the resource unimpaired for the enjoyment of visitors. Adding costumed interpretation and promoting the Ranch as a major interpretive resource can only quicken its decay. Moreover, greater visitor usage of the ranch will require greater stabilization measures and the potential loss of its historic fabric. As noted above, the plan should include a statement of guidelines for assessing and preserving all historic structures or, at a minimum, reference to relevant laws and NPS guidelines related to cultural resource preservation.

- 6m. The park would encourage the development of sites for camping outside the park on both private and public land. This would include the option of pursuing such developments through private operations and the Bureau of Land Management.
- 6n. The park would pursue the cooperation and support for the shuttle system from all park user groups. The routes and scheduling of the shuttle system are beyond the scope of this plan. The plan does call for a study to determine the most effective and feasible system.
- 6o. It was not the intent of the plan to reject the use of a subterranean design for the new visitor center. The plan has been revised to clarify that the siting of a visitor center in Pinto Basin is the element rejected from further consideration. Additional site-specific information is necessary to evaluate designs for the visitor facilities at the west and south entrances to the park. This would be done as part of the preliminary design process.
- 6p. Redesign of facilities in this area, including the Black Rock campground, horse camp, and day use parking would include restoration of areas surrounding the facilities.
- 6q. See response 6k.

COMMENTS

RESPONSES

NW-67-1994 15:47 NH'L PARKS & CLNS ASSOC. 518 US 4441 P.06
National Parks and Conservation Association 5

6r

The map relating to the proposed placement of the consolidated parking area for Barker Dam and Wall Street Mill is not clear. Is the intent to place the lot somewhere midway between the existing parking areas? Was consideration given to simply expanding one area and revegetating the other? If so, what is the reasoning behind impacting presently undisturbed land? This should be clarified in the plan as we are unable to comment on this proposal with the information given.

6s

Transition Planning Unit: The realignment of the road around the cholla garden constitutes a significant impact on the resource. The plan does not provide adequate specificity as to what impacts are created by the current alignment nor those resulting from any realignment. If and when realignments are identified, further environmental impact analysis will be required and should be stated in the plan.

6t

Pinto Basin Planning Unit: Included in this section should be mention of the potential development of the Eagle Mountain Mine site as well as anticipated impacts. We recommend working with universities in establishing baseline data for bighorn sheep and tortoise populations.

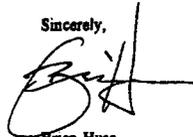
6u

Environmental Consequences

Desert Tortoise: Not included in the section on the desert tortoise is the threat posed by the proposed Eagle Mountain Landfill. The project raises grave concerns for the tortoise as well as for potential impacts on wilderness values. While that project is not within scope of this document, its possibility raises management concerns for the park. The document does raise this issue briefly. It is further stated that, as a management goal, the park will work cooperatively with other agencies and communities to facilitate ecosystem protection. It follows then that this document include a component outlining how the park will approach this prospect of a landfill or other development outside the boundaries of the park.

In closing, we would like to thank the Park Service for the opportunity to provide comments on the Joshua Tree National Park General Management Plan. Please keep us informed as to any and all development with respect to this and other planning issues.

Sincerely,



Brian Huse
Director, Pacific Region

cc: Ernie Quintana

TOTAL P.06

- 6r. The plan has been revised to eliminate this new parking area. Instead, the Barker Dam parking lot would be expanded and the Wall Street Mill lot and dirt access road would be eliminated and those areas revegetated. A trail would connect the Barker Dam lot to the Wonderland backcountry trailhead near the Wall Street Mill lot.
- 6s. The plan has been revised to indicate that further evaluation and environmental impact analysis of the current and alternative road alignments would be completed prior to construction.
- 6t. Mention of the potential development and impacts from the Eagle Mountain landfill has been added to this section of the plan. Surveys to address potential impacts from adjacent land use would be identified through the Resources Management Plan.
- 6u. The section on cumulative impacts has been revised to indicate that the Eagle Mountain landfill could have major impacts on park resources, including the desert tortoise. See response 6b.



ANGELES CHAPTER - SIERRA CLUB
3345 WILSHIRE BOULEVARD - SUITE 508 - LOS ANGELES - CALIFORNIA 90010 - (213)387-4787 - FAX: (213)387-5344

November 3, 1994

Regional Director
Western Regional Office
National Park Service
600 Harrison St., Suite 600
San Francisco, CA 94107-1372

Dear NPS Regional Director:

Enclosed are the comments of the Sierra Club's Angeles Chapter (covering Los Angeles and Orange Counties, and 50,000 Sierra Club members residing therein), on the Joshua Tree National Park General Management Plan, Development Concept Plan and the DEIS. Thank you very much for your careful review of these comments.

The Sierra Club is looking forward to a strong collaboration with the National Park Service and shares great pride with you in helping America (and indeed, the world) enjoy this newest of our National Parks.

Most sincerely,

James B. Schoedler

Jim Schoedler, Vice-Chair
Executive Committee

cc: Ernie Quintana
Phil Lingren

COMMENTS

RESPONSES

SIERRA CLUB - ANGELES CHAPTER:

-1-

(Hingson)

COMMENTS: JOSHUA TREE NATIONAL PARK: **General Management Plan
Development Concept Plan
DEIS**

BY DICK HINGSON November 2, 1994

Deserts in particular, and wilderness in general, offer natural quiet as a cardinal resource and attribute. A good term for natural quiet is quietude.

Quietude refers to a state or situation where natural sounds can be heard uninterrupted by technological sounds of human beings. Particularly in the desert, quietude is a state of natural silence, since ambient natural sound levels are often below the limit of human ear detectability.

Joshua Tree National Park is a wild, desert park unit. Nearly 80% of it is legislated wilderness.

7a

The documents under review give insufficient weight to so special a resource/attribute as quietude within Joshua Tree National Park. **The Sierra Club believes it is just as critical to as other park resources such as air visibility/quality, wildlife, water, trees, etc.** Furthermore, the wilderness character of the park is emphatically dependent upon the protection of quietude from derogation by aviation and other technological noises.

The Sierra Club strongly urges that the GMP and DEIS be revised as appropriate to articulate this attribute and present plans for better protecting it. Some opportunities to do so are suggested as follows (bolded material suggested as additions):

1. **Introduction:** Page 3, Paragraph 5 (expand)
"Unusual desert plants and animals and quietude, along with spectacular geological features, are all resources."
2. **Introduction:** Page 9, Paragraph 3 (expand)
"The wilderness provides an opportunity for physical and auditory solitude in nature. Clean air ensures an extensive visual range, and mountains, basins, canyons, massive boulders and rock outcrops, and desert plant life combine to make the monument outstanding scenically. The natural quiet greatly enhances the overall impact of such stunning scenery."
3. **Introduction:** "Management Goals" Page 10 (expand)
Expand third bullet to say, "improve knowledge of natural and cultural resources, including quietude." (expand)
4. **Planning Issues and Management Concerns** "Adjacent Land Use" (Page 13, fourth sentence in that section)

- 7a. The plan identifies as one of the purposes of the park to preserve the character and values of wilderness within the park, and that a management goal would be to "manage land and wilderness to preserve them unimpaired for future generations". The plan sufficiently acknowledges the importance of these values and character. The issue of noisy overflights has been added to the list of impacts from adjacent land use. Inventory, research, and monitoring of impacts from overflights would continue to be addressed by the Resources Management Plan.

-2- SIERRA CLUB - ANGELES CHAPTER
(Hingson)

"Other concerns include effects from air and water pollutants, invasion of nonnative species from adjacent lands, intrusion of noisy, oft-frightening, aircraft (both civilian and military) into otherwise silent park airspace."

5. Parkwide Alternatives: Page 19, Paragraph 3
". . .opportunities to experience the backcountry wilderness in physical and auditory solitude in much of the park."
6. Alternative A: "Back Country/Wilderness Management"
Page 20, Paragraph 2.

Following this paragraph, another paragraph could be included:

Particular needs are increasing to inventory, research, and monitor low-level aviation effects on park quietude. Means to accomplish this similar to ones recently employed in Grand Canyon and Haleakala National Parks will be applied.

Page 22, 5th Paragraph, 2nd Sentence

The park service would monitor, review, evaluate , etc.

7. Alternative A: "Visitor Use" Page 30, Paragraph 4
Insert an additional paragraph after this paragraph to this effect:

Visitors would be educated in brochures and signs as to the resource/attribute of quietude, and would be warned of the park's degree of control or not as to auditory derogation from insufficiently regulated low-level aircraft. An appropriate exhibit explaining quietude will be designed for the visitor centers. Procedures for filing appropriate complaints will be provided, and consultation with the FAA and DOD will be accelerated.

8. THE AFFECTED ENVIRONMENT: "The Natural Environment" P. 150

AIR QUALITY: Page 150, paragraph 3, add phrase as shown to 2nd sentence: "The scarcity of large vegetation combined with extraordinary natural quiet accentuates the vastness of the view."

QUIETUDE, (add entire section, just following the "Air Quality" section):

More than 80% of Joshua Tree National Park is designated as wilderness, where solitude--both physical and auditory--should be the rule. Few things are more incompatible with wilderness concepts than the sudden, deafening, overwhelming roar of unforeseen, low-level military jets, the noise of helicopters, or the loud droning of single engine aircraft overhead.

COMMENTS

RESPONSES

SIERRA CLUB - ANGELES CHAPTER
-3- (Hingson)

QUIETUDE (continued)

"Unfortunately, the park is located just a few miles from a large military base and within easy aviation reach of numerous others. Additionally, the military has an approved low-level aircraft training route (VR-1257) that runs the length of the park. Joshua Tree's backcountry and front-country are frequently subjected to overflights of aircraft of all sizes and descriptions."

"The incompatibility is intensified further in that Joshua Tree is a desert park, normally characterized by an envelope of natural silence."

"In Public Law 100-91, Congress recognized the importance of natural quiet in desert parks such as the Grand Canyon, and directed the Park Service to recommend measures to address and remedy the issue system-wide. The National Park Service issued such recommendations to Congress on September 12, 1994."

9. THE CULTURAL ENVIRONMENT: "Regional and Adjacent Land Use"
Page 165, lines 1 and 2: (expand)

"(For people who are subjected to) increasing automobile congestion, air pollution, and disappearing open space and quietude, the desert offers much in the form of rest and relaxation, fresh air, clear skies, outdoor recreation, solitude and silence for contemplation."

Page 165, last paragraph: (expand)

"The proximity of the world's largest Marine Corps base and even other more distant California/Nevada military installations is another threat. Frightening, low-level military overflights at near ground level, some originating hundreds of miles away, seriously impact the park's wilderness character and visitor experience. Immediately adjacent military training activities additionally introduce noise and night sky pollution, even ground shaking."

10. ENVIRONMENTAL CONSEQUENCES Page 173

Quietude should at least be mentioned in this section. Particularly in a desert wilderness park, it IS a specific topic of significant environmental concern.

11. CUMULATIVE IMPACTS "Natural Resources" Page 191

Integrate the term "aviation activities" above the park into this section.

12. CONSULTATION AND COORDINATION Pages 193 & 194

SIERRA CLUB - ANGELES CHAPTER

- 4 - (Hingson)

On page 194 there is reference to an Interagency Natural Areas Coordinating Committee meeting of May 15, 1991. Did military, i.e. Department of Defense, representatives participate? Did representatives of the Federal Aviation Administration attend? Was the need for better coordination re preserving quietude from aviation discussed? If quietude problems in the airspace above the park were in fact discussed with DOD and FAA, there's no evidence provided that these issues are anywhere addressed in the GMP, contrary to assertion in text about "all of these issues" being so addressed.

On Page 195, there is mention of informal meetings held with "members of key public interest groups" in May of 1992. Was the Sierra Club included in those meetings? It seems possible it was not; the Sierra Club being omitted on Page 196 from the List of Organizations to whom copies of the documents have been sent.

FOOTNOTE FROM PREVIOUS PAGE:

* (Preceding two paragraphs adapted from "Project Statement JOTR-N-02, "Monitor Effects of Aircraft Overflights", 1993 Joshua Tree Resources Management Plan, pp. 132-134.)

Note also ATTACHMENT: "Jet Training Invades Joshua Tree National Monument" by Dick Hingson Skyguard (Winter, 1990)

COMMENTS

RESPONSES

-5-

SIERRA CLUB - ANGELES CHAPTER
(Landers)

COMMENTS: JOSHUA TREE NATIONAL PARK GMP
by Ralph Landers Development Concept Plan
DEIS

Does the plan sufficiently address the threat to Joshua Tree resources posed by the proposed landfill just south of the park?

The proposed landfill use adjacent to the Joshua Tree National Park will cause many undesirable situations; such as:

- a. Increased traffic from dump trucks with the accompanying dust; diesel motor noise.
- b. Insect invasion, especially flies and other garbage eaters such as rodents.
- c. Odoriferous emissions that will invade the National Park and affect the wilderness ambience.
- d. Landfill operation is projected for 100 years!
- e. Predatory visitation by ravens which have been observed to lay in wait for desert tortoise hatchlings to appear, then catch and eat them. The desert tortoise habitat of the majority of the tortoises in the NP is only six miles from the proposed landfill.

by Judy Anderson & Jim Schoedler

We are concerned about the proposed placement of a new visitors' center inside the park. We attach an article by Secretary Babbitt "A New Conservation Ethic" (L.A. Times, 6/1/94), in which he argues for "gateway" outside-the-park "staging areas" for visitor information services, among other things.

It would be better to put the visitor center on public (BLM) land just outside the boundary. This applies to the important and much needed west end entrance visitors center, as well as to any proposed expansion complex at Cottonwood. The southern center would be constructed on public land south of the boundary, between the park and the interstate highway. It might well be an interagency facility, with expenses shared with BLM as a center where they could also provide additional information on the new wildernesses just south of the park -- Mecca Hills, Orocopia, Chuckwalla. This is an area which is already receiving overflow camping, and a campground might be planned in connection with the visitor center.

7b. See response 2d.

7b

-6-
SIERRA CLUB - ANGELES CHAPTER
(Anderson - Schoedler)

COMMENTS by Judy Anderson & Jim Schoedler, (cont.)

We oppose the permitting of placement of bolts in areas used by climbers, even if only a potential possibility. Some reasons:

- a. Is the rock less important than a flower? Removing any vegetation is not permitted -- even picking a flower is not acceptable. How can placing a bolt be acceptable? Is the destruction of vegetation around the base of a boulder which has new bolts less important than picking a flower?
- b. Is the rock less important than putting a grate over an abandoned mine hole? An environmental review is necessary for such an action. Shouldn't the placement of a bolt, and the associated changes in use patterns, also require environmental review?
- c. Is the placement of a new trail on a rock face, visible to anyone within the vicinity, to be permitted at the whim of any climber with a drill? Would a hiker tired of following the existing trails be allowed to place cairns or rock piles to mark a new forot trail he thinks others might enjoy hiking, or so he can safely find his way back to his car?
- d. What happened to the "LEAVE NO TRACE" ethic? With increasing visitor levels this becomes ever more important. Leaving bolts is more intrusive than leaving chalk marks -- neither is appropriate. We recall arguments about lug soles not being appropriate in some places because they dig into the soil too much, so we leave the lugs at home.

COMMENTS



San Diego Chapter
Sierra Club
Mountaineering Committee

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4605 Estrella Avenue
San Diego
CA 92115

Regional Director
Western Regional Office
National Park Service
600 Harrison St. Suite 600
San Francisco
CA 94107-1372

re: General Management Plan, Joshua Tree

Dear Sir,

I would like to bring to your attention several problems with the proposed Joshua Tree GMP, many of which are concerns because they are only vaguely covered in the GMP.

Camping and parking

8a The GMP states that fees and registration will be required for all camping. It is not clear whether this means that advance registration will be required. We would like to suggest that advance registration *not* be required for the majority of campsites in the monument.

8b I see no purpose in rerouting the west entrance road to the south side of Intersection Rock. The rationale for this should be clearly justified as it will cause unnecessary disturbance.

8c The GMP makes no specific reference as to which parking turnouts would be enhanced along the west entrance road. Many of these turnouts are currently inadequate and parking overflows onto both sides of the road. Furthermore, many of these turnouts serve significant climbing areas such as Hemingway Buttress. The NPS has proven unsuccessful in preventing the proliferation of multiple trails in such areas. The Access Fund has flagged pathways between these turnouts and the base of climbing areas in an effort to help reduce the proliferation of trails that criss-cross and erode the desert floor. The turnouts which are to be retained and those which are to be enhanced need to be clearly defined before comment on their appropriateness is possible. Furthermore, these turnouts need to be augmented with trails such as those marked by the Access Fund.

RESPONSES

- 8a. The plan has been revised to clarify that first-come, first-served camping would be retained. Reservations would be required at Black Rock, all group sites, and Ryan horse sites. Reservations for some additional campsites would remain a future management option.
- 8b. The plan states that the intersection at Intersection Rock would be relocated to improve traffic flow, sight distance, and safety. The intersection of Park Boulevard and Barker Dam Roads has a high hazard potential because there is a major visitor activity area at the intersection (Intersection Rock), there are multiple turns into various visitor use areas (the campground, day use parking, Barker Dam Road, and Hidden Valley area), the intersection carries a high volume of through traffic, and sight distance on the approach is limited because of the curve. All through traffic on Barker Dam Road also passes adjacent to the campsites on the southern side of Hidden Valley Campground. Realignment of Park Boulevard and relocation of the intersection to the south side of intersection rock would increase sight distance along the approach to this area, and clearly separate entrances into the day use parking area at Intersection Rock, the campground, the Hidden Valley area, and Barker Dam Road. Through traffic on Barker Dam Road would no longer pass through a portion of the campground.
- 8c. The plan has been revised to clarify that trailhead pullouts between the west entrance and Quail Springs would be retained and paved. Conceptual designs and specific numbers, size, and locations of these pullouts would be determined during design for the road reconstruction project. Parking between Lost Horse Road and the turnout to Hidden Valley would be consolidated into three primary parking areas with associated trailheads for nearby rock formations. These three areas include the Lost Horse ranger station access road lot (20 cars), Hidden Valley north lot (15 cars, 1 RV), and a third Hemingway lot (15 cars, 1 RV) that was added to the plan. The Lost Horse ranger station access road lot is near the intersection of this road with Park Boulevard. Hidden Valley north lot is about .25 mile west of the intersection of Park Boulevard and the road to Hidden Valley at an pullout near slam or jam climbs. The Hemingway lot would be along Park Boulevard, .25 to .5 mile east of the Lost Horse ranger station access road. Paved pullouts would be provided approximately every .25 mile along Park Boulevard. These pullouts would use existing dirt pullouts or disturbed areas wherever possible and would have connecting trails.

COMMENTS

RESPONSES

8d

Ryan campground is one of the premier rock climbing campground sites in the monument and, without offense to the horse users, it is unclear why this particular site should be partly given over to horse users. Unless clear justification for this option is given, and no alternative is explored, I am not in favor of including horse user spaces in Ryan campground.

Rock climbing

8e

It is inappropriate for the GMP to refer readers to the Backcountry Management Plan (BMP) for guidance on the Climbing Management Plan since the BMP is presently unavailable. Furthermore, the VERP process that is currently being pursued by the Joshua Tree staff segregates the Park into different zones. The areas that are being covered by the GMP are distinct from those to be addressed by the BMP, suggesting that this is an attempt by the NPS to duck issuing a statement of policy on rock climbing in Joshua Tree.

A small fraction of rock climbers is placing expansion bolts on blank rock faces to protect leads on climbs that could otherwise be top roped in perfect safety. This hedonistic practice is causing a great deal of ill will between rock climbers and Park managers, a situation that must be rectified. Therefore, we support the current moratorium on placing new expansion bolts in the Wilderness pending introduction of some process that can regulate the proliferation of new bolted routes. However, we propose that there should be some interim process by means of which potentially dangerous sub-standard expansion bolts can be replaced on climbs, especially on multi-pitch climbs such as "Walk on the Wild Side." The ban on replacement of existing expansion bolts in the backcountry, a policy that appears to be unique amongst all NPS units to Joshua Tree, ought to be lifted. To continue prohibiting replacement of suspect expansion bolts is courting lawsuits brought against the NPS by injured climbers.

8f

Roads

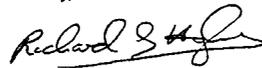
8g

The proposed paved roads that will provide increased access into Barker Dam and the Geology Tour road are counter-productive to minimizing visitor disturbance of these semi-primitive park areas. Furthermore, these roads will increase mortality to the sensitive desert tortoise population.

8h

The GMP appears to have a bias against backcountry users. The 4WD dirt road into the northern end of the Coxcomb mountains travels up a wash and therefore its use causes no degradation of the Park's natural resources. However, this road is used by Sierra Club mountain climbers to reach Tensor, Spectre and Dyadic peaks. There is no rationale given for closing this particular access road, although one might conjecture that one possibility is an inability of the NPS to collect user entry fees at such locations. Indeed, the GMP does not state which roads are to be closed. I don't doubt that other roads fall into this same category of unnecessary closure.

Sincerely,



Dr. Richard J. Hughes
Mountaineering Committee Chair

8d. Ryan Campground is along the California Hiking and Riding Trail and can be reached in a day from Black Rock, a major equestrian staging area. It provides the only overnight site in the interior of the park for equestrians. The plan supports the continued use of Ryan campground by this user group. Because equestrians typically need to plan their trips in advance and their choice of sites would be limited, the plan also proposes the use of a reservation system for these horse campsites.

8e. The climbing management plan will be revised based on several ongoing resource studies and will be incorporated into the Wilderness and Backcountry Management Plan. The Park Service believes that the completion of the studies is necessary to provide a rational basis for decisions regarding climbing management. The Climbing Management Plan will then comprehensively address climbing issues throughout the park. Until these studies are completed, the general management plan recommends the continuation of the management guidelines regarding climbing in the park. This includes the continued ban on expansion bolts in designated wilderness.

8f. See response 8e. The plan was revised to reflect that the Park Service cannot guarantee the safety of climbers and that reliance on existing bolts is not recommended.

8g. Paving Barker Dam Road and the parking areas along the primary park roads in the heavily used Lost Horse planning area would delineate these facilities and help to control roadside and shoulder parking. Paving Barker Dam Road would also allow a variety of vehicle types, but not more vehicles, to access parking for the Barker Dam interpretive trail and other trailheads in this area. The parking lot capacities would be limited to the levels that are already reached on some of the busiest days of the year. To reduce competition for limited parking in this area, the plan proposes an connected network of roads, trails, parking areas, and shuttle routes to serve various destinations in this area of the park. Visitors who could not find a parking space in a lot closest to their destination could park further away and have options to hike, bike, or take a shuttle to their destination. Additionally, improving the public's awareness of the wide variety of visitor opportunities throughout the entire park is intended to better distribute visitors and encourage use in other areas, including the Geology Tour Road. This road would be improved to a two-wheel drive dirt road (not a paved road) to allow more visitors to experience the interpretive opportunities it offers.

Increased mortality to the desert tortoise could occur if traffic increases on these roads. However, tortoise densities in these areas are low (0-7/km) to moderate (8-29/km) and based on current experience, such roadkills would be expected to average less than one per year. The Park Service would develop mitigation measures during road design in consultation with the U.S. Fish and Wildlife Service.

8h. This area of the park is designated wilderness. Vehicles are prohibited.



**Sierra Club
San Geronio Chapter**

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3) Backcountry Management Plan- Although I am aware of The Backcountry Management Plan for the park, I believe this should of been included in this General Management Plan. The California Desert Protection Act adds an additional 250,000 acres of land to our park.

9c

There needs to be an addendum, of other description of how the planning for these added lands will be handled.

4) Military Overflights- The Plan does not address this issue at all. Despite the fact the park is mostly wilderness area and visitors are encouraged to experience the solitude and silence the wilderness offers, it can be quite difficult with jet fighters flying over your head. I have experienced it numerous times. Does Park Management plan to address this issue? Furthermore, I am sure studies would show a negative affect such noise invasion creates on both animal and plant life.

9d

5) Shuttle Service- I welcome and encourage the need for a shuttle system throughout the park, especially on the busy weekends during the winter snows in spring. The Plan addresses this issue but not very extensively.

9e

6) Recycling Plan- Not addressed in the plan. This needs to be addressed and encouraged throughout the entire park along roadside cutouts and in all campgrounds.

9f

In closing, I again Thank You for the opportunity to comment on this most important Management Plan. I look forward to working closely with Superintendent Quintana in making this plan a reality. It is heartwarming to know that he will lead this effort. Please continue to keep me informed on this and other Park Planning Issues.

Best Regards,

Phillip Lindgren
 Coordinator- Desert Committee
 San Geronio Chapter

cc: Ernie Quintana
 Peter Burk
 Joan Taylor

2 of 2



... To explore, enjoy and preserve the nation's forests, waters, wildlife, and wilderness ...

Comments and Responses

COMMENTS

RESPONSES



... preserving America's diverse climbing resources.

from
LINDA E. SHREEVES, ESQ.
KELLEY DRYE & WARREN
515 S FLOWER STE 1100
LOS ANGELES CA 90071

November 4, 1994

Regional Director
Western Regional Office
National Park Service
600 Harrison Street, Suite 600
San Francisco, California 94107-1372

Re: Draft General Management Plan for Joshua Tree
National Monument

Dear Sir or Madam:

The purpose of this letter is to set forth the concerns of The Access Fund with the Draft General Management Plan for Joshua Tree National Monument (the "Monument") (the "Draft GMP"). The Access Fund is a national non-profit organization of climbers dedicated to preserving America's climbing resources and climbers' access to those resources. The Access Fund supports studies of climbing impacts, funds land acquisitions and impact mitigation projects, publishes climber educational and low impact climbing materials, and assists in the preparation of climbing and backcountry management plans at all levels of government. The Access Fund has participated in the development of climbing or management plans at Yosemite National Park, Devils Tower National Monument, City of Rocks National Reserve, Canyonlands National Park, Pinnacles National Monument, Colorado National Monument, Cibola National Forest, Daniel Boone National Forest and other climbing areas on state and federal lands.

NPS-8, Management Policies, states at page 8:2 that "the National Park Service will encourage recreational activities ... that promote visitor enjoyment of park resources through a direct association or relation to those resources ..." Approximately fifty to seventy-five percent of the visitors to the Monument are climbers. As the Monument's major user group, climbers have a keen interest in Monument policy development and management. For this reason, The Access Fund and other local climbing groups have actively worked with the Park Service to ensure that policy and management decisions reflect the interests of climbers.



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COMMENTS

RESPONSES

Regional Director
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Page 2

Our primary concern of The Access Fund is the finalization of the Climbing Management Plan which is a component of the Backcountry Management Plan (the "BMP"). Our concerns with the BMP and the interim Climbing Management Plan have been set forth in previous correspondence and remain unassuaged. However, inasmuch as the BMP and the Climbing Management Plan are components of the Draft GMP, we believe it appropriate to set forth our general concerns with the Draft GMP at this time, and address our specific concerns with the BMP and the Climbing Management Plan at a later date. This should not in any way be interpreted as approval of the BMP or the interim Climbing Management Plan by The Access Fund.

Unless otherwise stated, this letter will address concerns with "Alternative A - Proposed Action" ("Alternative A"). Although we have attempted to limit discussion of our concerns to only those issues which directly or indirectly affect climbers, many of the actions proposed by the Draft GMP will affect all users of the Monument. It is our sincere hope that the Draft GMP will be implemented in such a way that the interests of all users, including climbers, will be equally served.

A. Backcountry and Wilderness Use and Management. The Access Fund has previously stated its concerns with the BMP and the interim Climbing Management Plan and has worked with Park Service personnel at the Monument to develop these Plans. The Draft GMP does not clearly state what activities will be permitted in backcountry and wilderness areas, but it is our understanding that these matters will be fully resolved in the BMP. It is our sincere hope that the Park Service will continue to work with The Access Fund to finalize the BMP and the Climbing Management Plan. Hopefully this mutual cooperation will result in a Climbing Management Plan that will balance the desires and goals of both the climbing community and the Park Service.

10a

The Draft GMP refers several times to studies which are or have been made concerning the effects of climbing in wilderness areas. By this letter, The Access Fund requests that it be provided with copies of any studies which have been or will be prepared concerning these matters. This will enable us to interact more productively with the Park Service in developing the Climbing Management Plan. In addition, The Access Fund has previously indicated that it wishes to work with the Park Service to develop and conduct its own independent study concerning climbing in the Monument. To date we have received no meaningful feedback regarding this proposal.

10b

Finally, the Draft GMP contains certain inaccurate statements about bolting and fixed anchors. In particular, the Draft GMP states that all rock climbing routes can be climbed without bolts. This is simply untrue. Several routes in the Monument cannot be climbed without the aid of fixed protection. While this is arguably not the forum for debating the many issues surrounding bolting in the Monument, we wish to clarify this

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- 10a. Findings from the sociological study were presented to the public in January 1995. Findings from the biological study were presented to the public in March. The park will present the findings of the cultural resource study to the public when it is completed. Preliminary results of the sociological and biological studies are available at the park.
- 10b. The plan has been revised to state that most routes can be climbed without bolts.

COMMENTS

RESPONSES

Regional Director
November 4, 1994
Page 3

misstatement in the event that it is relied upon by those who are not familiar with technical rock climbing techniques or the type of routes available in the Monument.

B. Redesign of Campgrounds and Implementation of Registration System. Redesign of the campgrounds in the Monument to effect some separation between incompatible user groups such as motorhomes and backpackers seeking quiet is long overdue. Although certain groups such as horse users and large groups have special needs, it would detract from the overall experience to strictly segregate each user group into separate campgrounds. Many national parks have set aside certain campground areas that are available for tent users only while maintaining other campgrounds areas where campers, trailers and motorhomes are permitted. Where feasible, user groups should not be prohibited from camping in areas which cater primarily to one user group. For example, if space is available, tent users should not be precluded from using sites in campgrounds set aside for horse users.

10c

10d

The Draft GMP does not indicate the percentage of sites that will be allocated to "special need" user groups or whether campsites in these areas will be available to other user groups. A description of how campsites will be allocated to special need user groups is necessary to ensure that all user groups will have an equal opportunity to enjoy the experience of camping in the Monument. Hopefully, if campgrounds are allocated so that some user groups are preferred over others, the interests of those users who seek a more direct association with Monument resources will prevail.

10e

The redesign of certain camping areas to meet the needs of special user groups logically suggests the implementation of a reservation system to ensure that these user groups have access to the campsites that have been provided especially for them. Each alternative proposal contemplated by the Draft GMP indicates that a registration system will be implemented and fees and time limitations will be established. However, no details are given concerning the registration system or the nature of the fees and time limitations which will be imposed. It is important that campsites be available on both a reservation and a "first-come first-served" basis. The Monument is a destination for climbers from around the world, most of whom would not be aware that advance reservations are required to camp in Monument. A system that allows both reserved and first-come first-served camping will ensure fair allocation of campsites at peak times when space is limited as well as ensure that campsites will not remain vacant if users cancel their reservations or fail to show.

10f

Finally, the fees for camping in the Monument should be minimal. High fees would unfairly discriminate against lower income users who may not be able to afford any vacation other than a family camping trip. Camping is one of the few remaining activities that can be enjoyed by people from all walks of life, and the national park system was

- 10c. The plan does not propose segregation of different user groups into separate campgrounds. A loop in Ryan Campground would be designed to meet needs of horse users. The Park Service would prohibit other users in this loop when it is reserved by equestrians. This would avoid safety hazards associated with large animals.
- 10d. Equestrian sites at Black Rock and Ryan Campgrounds and group sites at Sheep Pass and Indian Cove Campgrounds are the only campsites proposed for certain users. Other campsites would be open to tents or RVs.
- 10e. The campground registration system is an operational issue that is beyond the scope of this general management plan. The plan has been clarified that first-come, first-served camping would be retained. See response 8a. Camping fees would continue to be charged only at Black Rock and Cottonwood and group sites. Charging fees at other unimproved campgrounds will be evaluated at a later date.
- 10f. See response 10e. Fees for campgrounds would be evaluated at a later date. Fees would be based on comparability studies with similar nearby campgrounds.

COMMENTS

RESPONSES

Regional Director
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Page 4

established in part, so that our natural resources could be preserved and enjoyed by everyone.

C. Modification of Parking Facilities. Clearly, parking outside designated areas increases disturbance to the environment. Climbers and hikers occasionally use roadside parking to access trails which are not located adjacent to major features of the Monument. Under each alternative proposal contained in the Draft GMP, roadside parking will be prohibited. Alternative A provides that a shuttle system will be provided to serve various destinations in the most heavily used areas of the Monument. Providing shuttle service to areas other than those most heavily used would accomplish two goals. First, it would ensure that users of trails and areas not located near major Monument features would park in designated areas. Second, it would encourage the use of areas which are not heavily used and help reduce congestion of the heavily used areas at peak times.

10g

10h

Comparison of existing parking areas to those proposed by Alternative A indicates that certain parking areas will be eliminated or combined. Although the number of overall designated parking spaces will increase under Alternative A, the elimination of roadside parking coupled with the combination of certain parking areas will result in overcrowding. For example, Alternative A provides for the elimination of the Hidden Valley day use parking area and the combination of all Echo Cove area parking areas into one large parking area. This redesigned parking area may be sufficient to accommodate all day users of the Hidden Valley and Echo Cove areas. However, it appears that this parking area will also serve as the staging area for the Keys Ranch tours, and it is highly likely that at peak times the redesigned parking area will be insufficient to serve these two popular climbing areas as well as serving as the staging area for the tours. While the proposed redesign of the parking areas may reduce environmental disturbance, it must also provide sufficient space to accommodate all Monument users during peak times.

10i

10j

The Access Fund strongly urges that representatives from the climbing community, and any other groups who use areas of the Monument other than the major features described in the Draft GMP, be included in discussions concerning the development and redesign of the parking areas and the implementation of the shuttle system. We would like to play an active role in meeting with key Park Service personnel and engineers, architects and planners to redesign the parking areas and formulate the shuttle service system. In order for the shuttle system and the redesigned parking areas to work together effectively, climbers must be consulted about the areas they need to access so that shuttle stops can adequately serve those areas. Involvement in the development process will ensure that the needs of Monument users who seek experiences other than those found at or near major Monument features will be met and will help to better accomplish the goals set forth in the Draft GMP.

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- 10g. Paved pullouts would be provided approximately every .25 mile along Park Boulevard. These pullouts would use existing dirt pullouts or disturbed areas wherever possible.
- 10h. A study to determine the most effective and feasible route for shuttle service would be undertaken. The plan has been revised to note that this study would include an evaluation of shuttle service to areas other than the most heavily used.
- 10i. Day use parking in Hidden Valley Campground would be eliminated and a larger day use lot would be provided at Intersection Rock. An expanded parking area would be provided at Echo T. Vehicles would still be allowed to park in a dirt lot near Echo Cove that is constrained by topography. The plan has been revised to maintain the separate Keys wait lot.
- 10j. A separate public involvement process and environmental impact analysis would be undertaken during the design stage for park roads and for the shuttle study.

COMMENTS

RESPONSES

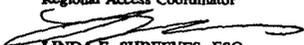
Regional Director
November 4, 1994
Page 5

The Access Fund appreciates being included in the development of the Draft GMP, the BMP and the Climbing Management Plan in light of the fact that the Monument is such an important area to climbers around the world. We hope that the Park Service will continue to keep The Access Fund and other interested groups informed about matters which affect climbing in the Monument so that we can work together to develop a plan that will enable climbers to maximize their experiences at the Monument in a way that adequately preserves its resources for generations to come.

Very truly yours,



GLENN D. PINSON,
Regional Access Coordinator



LINDA E. SHREEVES, ESQ.,
Regional Access Coordinator

cc: Ernest G. Quintana, Superintendent, Joshua Tree National Monument
Tom Gavin, Backcountry Ranger, Joshua Tree National Monument

Arizona Mountaineering Club

P. O. BOX 1695 • PHOENIX, ARIZONA 85001

November 3, 1994

Regional Director
Western Regional Office
National Park Service
600 Harrison Street, Suite 600
San Francisco, CA 94107-1372

Dear Sir,

The purpose of this letter is to respond to the National Park Service's (NPS) draft General Management Plan (GMP) for Joshua Tree National Monument. The Arizona Mountaineering Club (AMC) cannot offer its support for any option presented in the draft GMP at this time. The AMC believes that several points need to be clarified or corrected prior to our support being offered. These points are outlined below. All points discussed are in reference to Alternative A (the NPS' preferred alternative), but where appropriate, apply to the other alternatives.

Rock Climbing

It is positive that the NPS acknowledges Joshua Tree National Monument as one of the most popular climbing spots in the world, but the draft GMP is biased against climbers:

11a	<ul style="list-style-type: none"> The draft GMP terms protection bolts as "rock defacing." This is an unsupported judgment statement and must be removed from the GMP.
11b	<ul style="list-style-type: none"> The draft GMP states that all bolts in wilderness are unnecessary as "all routes can be climbed with alternative methods." This is simply not true. Many formations in the monument have no non-technical way to the summit, or offer traversing or multi-pitch climbing which can not be safely top-roped. Since all routes cannot be safely climbed without bolts, this statement should be removed.
11c	<ul style="list-style-type: none"> The AMC supports the temporary ban on the placement of new bolts in designated wilderness until further studies and a recommendation are made. The NPS should change this ban to allow for the replacement of bolts in designated wilderness. This is a critical safety issue, and the change should be made immediately.

11a. The statements in the plan regarding bolts have been revised.

11b. See response 10b.

11c. See response 8e.

COMMENTS

RESPONSES

Camping

- 11d

<ul style="list-style-type: none">The proposed reservation system for all camping in the monument does not appear to allow for camping on a first-come first-serve basis. The plan should be revised to allow for first-come first serve camping.

- 11e

<ul style="list-style-type: none">No mention of a walk-in climber's campground is made. The Access Fund and other climbing groups have supported the creation of a climber's campground for several years. The Access Fund has offered to fund the effort and proposed a site near Sheep's Pass. The NPS should reconsider its decision and implement this proposed campground. As camping is already limited, and "camp full" signs are the norm in spring and fall, this campground is much needed.The AMC supports the NPS proposal to relocate camp sites that are located at the base of climbing areas.
--

Parking

- 11f

<ul style="list-style-type: none">The AMC is concerned about the proposal to create large paved parking lots (e.g., paving one lot near Echo Tee as a Keys Ranch staging area, one large lot for Barker Dam/Wonderland Ranch). These combined lots will create user conflicts.
--
- 11g

<ul style="list-style-type: none">The AMC does not support creating large paved parking lots in previously undisturbed areas (e.g., proposed Barker Dam/Wonderland Ranch parking).
--
- 11h

<ul style="list-style-type: none">The AMC does not support the NPS proposal to eliminate parking from the West Entrance to Quail Springs and from Hemmingway to Hidden Valley Campground. This eliminates not only parking, but access to much of the monument.The AMC is confused by the relocation of the Oyster Bar parking area approximately .5 miles further down the road. This parking area is paved and has a curb, and is currently in a good location. Moving it seems to offer little benefit.

General

- 11i

<ul style="list-style-type: none">The vagueness of certain aspects of the plan (e.g., campground redesign, campsite numbers) makes it difficult to analyze and understand the draft GMP. It would appear to make getting an accurate environmental impact statement difficult as well.
--

Thank you for the opportunity to participate in the review of the draft GMP. The AMC believes that the plan provides a basis for improving the Joshua Tree experience. But, as it currently stands, the plan could greatly alter this experience as well. It is recommended that the NPS work with the Friends of Joshua Tree and the Access Fund to eliminate inaccuracies and improve the aspects of the plan that have been detailed above.

11d. See response 6a.

11e. The plan includes the conversion of the campsites on the northern perimeter of Hidden Valley Campground to walk-in sites.

11f. See response 6r.

11g. See response 8c.

11h. The plan has been corrected to locate parking for the Oyster Bar at parking area 21.

11i. The purpose of the campground redesign is to better delineate roads, parking, trails, and campsites and reduce impacts from the indiscriminate parking and site use. Redesign is not expected to enlarge the footprint of the campgrounds on the land nor change the composition of user types. The capacity of campgrounds would not appreciably change. The plan has been revised to indicate that campsites would not be restricted by user type. See response 10d.

Please place the AMC on the mailing list to receive mailings about the GMP and the Backcountry Management Plan. Send this information to the attention of the Access Committee, Arizona Mountaineering Club, PO Box 1695 Phoenix Arizona 85001.

Sincerely,



Thomas Matthews
Chairperson, Access Committee

About the Arizona Mountaineering Club: The AMC is a non-profit organization with approximately 300 members. While AMC members participate in many outdoor recreational and conservation activities, the primary focus of the AMC is rock climbing. Joshua Tree National Monument is a common fall, winter and spring rock climbing destination for our members. AMC members take an active interest in preserving monument resources, and participated in climber organized cleanup and low impact use efforts.

COMMENTS

RESPONSES

S.D.C.A.
SAN DIEGO CLIMBERS FOR ACCESS

National Park Service
Regional Director,
Western Regional Office,
600 Harrison Street,
San Francisco, CA 94107-1372

10734 VILLA BONITA
SPRING VALLEY
CA. 91978
OCT 28th 1994
P1 of 3

Subjects: Proposed Climbing regulations, Parking & Camping changes for Joshua Tree N.M.

Dear Sirs,

We are a 300 member organisation of climbers in San Diego county, California. Many of us climb and camp regularly at Joshua Tree N. M. I attach a name and address list of our membership. I am writing to you at the request of our membership as we wish our views to be known.

We are appalled at the wording used and some of the opinions expressed in your recently published General Management Plan. Not only do these statements show a lack of knowledge of Technical Climbing they also convey a strong sense of BIGOTRY on the part of the authors. Specifically we object to the word 'defacing' on P22 third paragraph and to the statements 'all routes can be climbed using alternative means and can be top roped' on P170.

On the first point;

A) Fixed bolt hangers are very small and usually hard to see. Experienced climbers often have difficulty spotting them even when they know the bolts are there. Bolts take up very little space and remove minuscule amounts of rock.

B) As to the word 'defacing', as strong a case could be made for the removal of both 'Historical Graffiti' and Native Rock-art on the same basis 'that they deface the natural rock'. Their only redeeming factor is that they have been there longer! Also we would point out that a few dozen feet of new blacktop surface effectively 'defaces' a larger area than all the bolts ever placed in Joshua Tree!

To correct you on the P170 statements;

1) Fixed protection is not used to 'climb' it is used to 'protect' the lead-climber from death or injury in the event of a fall.

2) Fixed bolts are usually only placed where 'natural' protection is not available or is suspect, in fact climbers frequently remove unnecessary bolts from routes on ethical grounds!

3) Many climbs cannot be protected without the use of fixed protection. Climbers would be at high risk from death or injury if they lead-climbed these routes without the fixed bolts! As to there being too

12a. See response 10b, 11a, and 11b.

12a

COMMENTS

RESPONSES

- 2 -

many bolts, a large portion of all climbs (probably more than 33%) have an 'X', 'R' or 'PG' rating indicating that they are poorly protected and still have a substantial death or injury risk in the event of a fall.

4) Many climbs cannot be 'top roped' as there is no non-technical access to the set-up point or because they are multi-pitch and thus too high for practical top roping. Climbing on top rope is a totally different and much easier experience than lead-climbing a route even with fixed bolts in place.

PARKING:

The Plan effectively removes many parking areas close to some popular climbing areas. Those persons wishing to climb in these areas will be left to walk long distances or risk illegal parking. The parking changes in the Plan need to be discussed with the users of the monument not based totally on management needs.

12b

CAMPING:

The camping in the Monument works fine as it is, 'It ain't broke', so why change it?. We object to some of the proposed changes in the booking and cost of camp sites. We oppose the proposal to place booking in the hands of a commercial agency on both cost and convenience grounds. On cost; many of the users of campsites are on low income, they are comprised of students, senior citizens and large families. A quick survey of campsites on most weekends will confirm this. These people do not have the money to pay fees for camping and so would be 'squeezed' out by this proposal. It is obvious that those proposing the use of a commercial booking agency have not had many dealings with such enterprises. Put bluntly they are a 'royal pain in the rear end', even the simplest of bookings usually takes multiple phone calls to arrange. Many people's jobs do not permit them the luxury of making these calls during working hours so they are effectively precluded from booking these campsites. Further, bookings on peak or Holiday weekends become near impossible to obtain as some groups/persons seem to have found ways to 'beat the system'.

12c

Our final point on campsites is that, to our knowledge, no other National Park or Monument that has camping fails to provide first-come first-served campsites.

12c

We are an environmentally aware group and feel that climbing can and should be a low impact activity. We do understand the need for wilderness, the needs of wildlife and the necessity of preserving the quality of our wild places. We accept that specific areas need to be closed, sometimes for extended periods, to protect Raptors and other creatures during their breeding seasons and other times when they are sensitive to disturbance. We recognize that the use of motorized drills is inappropriate and often unnecessary in many areas.

12b. See response 8c.

12c. See response 10e.

12d. See responses 6a.

COMMENTS

RESPONSES

- 3 -

12e

We are, however, concerned that our safety and access are not compromised by decisions that are not based on sound research. It is our collective opinion that fixed bolts need to be replaced on a regular, but not frequent, basis as they all deteriorate and become unsafe over time. Climbs that have been in use for many decades will be unsafe without known good bolts in place. We also believe that regulation of climbing equipment such as chalk, protection devices, and Aid climbing hardware would be difficult, if not impossible, to enforce.

We urge you to keep regulations to a minimum and to manage the public lands under your jurisdiction by co-operation and mutual respect. We believe that the large majority of the 'Climbing Community' is sufficiently mature to practice low impact recreation based on trust rather than on regulation. Adequate regulations already exist in most areas to manage the risk to nature and man as well as to protect the environment. Climbing is a traditional use of public lands including wilderness areas. It has mostly been a safe, low impact, sport and can be even more so in the future.

Please make any future changes of regulations and guide lines to the use of public lands after full consultations with all interested users.

Please put my name and address on your mailing list so that I can keep our members informed of pending changes.

Yours Sincerely,

MICHAEL M. BROWN, CHAIRMAN

12e. See response 8e.



San Diego County Trails Council, Inc.

P.O. Box 2727 • El Cajon, CA 92021-0727
(619) 563-5025 • (619) 390-0749

November 3, 1994

Mr. Ernie Quintana, Superintendent
United States Department of Interior
National Park Service
Joshua Tree National Monument
74485 National Monument Drive
Twentynine Palms, CA 92277-3597

Subject: General Management Plan -
Joshua Tree National Monument

Dear Mr. Quintana:

San Diego County Trails Council, Inc. is a grassroots, citizen sponsored, nonprofit corporation dedicated to preserve and maintain non-motorized, multi-use, riding and hiking trails.

We strongly support a general management plan for the Joshua Tree National Monument that not only increases public awareness and protection of the wilderness areas, but allows equestrian use.

Lately, it appears the equestrian has become the scapegoat for natural resources and environment preservation but is more natural and "native" to California than most plant species or animals. The "equestrian" has become "politically" incorrect unjustly. Equestrian are important to our society, history and county, state and federal lands from which they are now being excluded.

Please include the equestrians in your General Management Plan and allow them continued privileges to enjoy the beauty, plant and wildlife they have had for so many years.

I would appreciate being informed of any action taken regarding the General Management Plan for Joshua Tree National Monument.

Sincerely,

Maryanne Vancio
Trails Coordinator

A NON-PROFIT CORPORATION
Dedicated to the Acquisition and
Preservation of Riding and Hiking Trails

13. Comments noted.

COMMENTS

RESPONSES



Morongo Basin Mounted Sheriff's Posse
6527 White Feather Road
Post Office Box 337
Joshua Tree, California 92252



October 30, 1994

Mr. Ernie Quintana, Superintendent
United States Department of the Interior
National Park Service
74485 National Monument Drive
Twenty-nine Palms, CA 92277-3597

Dear Mr. Quintana,

This letter is in regards to the draft General Management Plan for Joshua Tree National Monument.

The members of the Morongo Basin Mounted Sheriff's Posse (MBMSP) would like to contribute their ideas and comments to you, and all concerned others, regarding horse use in the monument.

The MBMSP assists the sheriff's department in conducting searches and rescue missions throughout San Bernardino County, and whenever necessary, Riverside County. Objects of these searches may include lost persons (often in a compromising, life-threatening situation), discovering and preserving of evidence, and sometimes involving the remains of a deceased. To date we have been very successful in resolving our assignments, but to maintain that kind of rating, volunteers must keep abreast of the current techniques.

Joshua Tree National Monument, with its variety of terrain, has been a fundamental aid to our trainings and practices, an ideal setting for members to learn map and compass, tracking, handling of a mock crime scene, coordinating grid patterns, radio communications, just to name a few.

We have held four benefit rides at Black Rock Horse Camp, (our only fundraising event) which helps us to afford classroom materials for in-service programs, and to purchase up-dated equipment.

Using the monument for these purposes has been very much appreciated.

Feel that the attached list of recommendations, upheld by our group, are some basic components that would benefit all equestrian related concerns, if implemented.

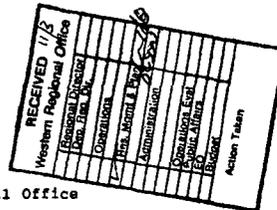
We recognize the vital role the rangers play in maintaining and preserving our wonderful monuments and parks, for future use and look forward to working with you.

Best regards,

D. Lee Hall
D. Lee Hall
Commander, MBMSP

jed/DLH
enc.

cc: Tom Gavin
Regional Director, Western Regional Office



COMMENTS

RESPONSES

DRAFT RECOMMENDATIONS--HORSE USE
 JOSHUA TREE NAT'L. MON'T., OCT. 1994

- 14a 1. Develop all existing horse trails as riding & hiking trails.
- 14a 2. Enlarge parking area at Lower Covington Flat to allow horse trailer/vehicle parking.
- 14b 3. Parking space for horse trailers along California Riding & Hiking (CRHT) at back country boards.
- 14c 4. Provide adequate trail markers and trail maintenance (funding available for maintenance).
- 14c 5. Provide horse trailer/vehicle parking at trailheads--Desert Queen Mine, Pine City (both on same lot), and Boy Scout Trail.
- 14d 6. Maintain the Queen Valley & Covington Flats dirt roads for 2-wheel drive. Upgrade Geology Tour Road to a 2-wheel drive route. Also remove rock barriers at Geology Tour Road & Pushavalla Canyon Trail to Pinyon Well. (Geology Tour Road & Pinyon Well was originally a horse trailer parking area).
- 14e 7. Enhancement of Ryan Camp; return to horse use and allow for day use parking. Also add/establish a reservation system for Ryan Horse Camp. A fancy computer system for reservations is not necessary in our opinion. Black Rock personnel write them down on a clipboard, with success. A reservation system would manage visitation areas effectively.
- 14f 8. Request that Ryan Horse Camp be given maximum amount of equestrian RV spaces; request Phase 1 priority instead of Phase 4 in GMP; and request a prominent sign specifying "Horse Camp" at Ryan horse trailer parking area.
- 14g 9. Provide adequate horse trailer parking for Pushavalla Canyon entrance from Indio Hills area for Coachella Valley equestrians and hikers.
 Provide adequate horse trailer parking for Boy Scout Trail in Indian Cove area for 29 Palms equestrians and hikers.
- 14h 11. Continued access to Quail Springs area for local residents near Monument Manor.
- 14h 12. Continued access to Black Rock Horse Camp from southwestern area of Yucca Valley and Morongo Valley, via Poleline Road.
- 14h 13. Continued access by Yucca Valley locals to Black Rock via N/S entrance at wash one mile east of camp.
- 14i Presently, at Black Rock Horse Camp, we like the nice level parking available, as well as running water, restrooms, and the separation of the Horse Camp from the non-horse camp. A restroom facility directly adjacent to the horse camp would be very much appreciated.

- 14a. Parking for trailheads open to horse use would be designed to accommodate horse trailer/vehicle parking.
- 14b. The plan proposes improved trail marking and maintenance.
- 14c. See response 14a.
- 14d. Trail access to Pushavalla Canyon would be maintained with vehicle barriers near the trailhead.
- 14e. Day use parking for hikers and equestrians would be provided at the Ryan Ranch and Ryan turnout parking areas along Park Boulevard. Limited day use parking (four to five cars) for hikers would continue to be provided at the backcountry board at Ryan Campground.
- 14f. The priority 4 has been revised to priority 1.
- 14g. See response 14a.
- 14h. The park is working with other city, county, state, and federal agencies on a regional trails plan that will address the continuation of trails that lead to and from the park boundary.
- 14i. The plan includes the placement of a new restroom at the Black Rock horse camp.

COMMENTS

RESPONSES

COACHELLA VALLEY HORSEMAN'S ASSOCIATION

October 24, 1994

Ernie Quintana
Superintendent
United States Department of the Interior
National Park Service
Joshua Tree National Monument
74485 National Monument Drive
Twenty-Nine Palms, CA 92277-3579

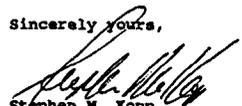
Dear Mr. Quintana:

The Coachella Valley Horseman's Association fully endorses the attached "draft recommendations for horse use at the Joshua Tree National Monument", as well as the "additional comments".

The horse and rider are an integral part of California and the West, both historically and for future generations. It is imperative that the national park system recognize the horse and rider and we appreciate the opportunity to provide input.

If we can be of any further assistance, please do not hesitate to call on us.

Sincerely yours,


Stephen M. Kopp
Acting Secretary
34-285 Suncrest
Cathedral City, CA 92234

COMMENTS

RESPONSES

DRAFT RECOMMENDATIONS--HORSE USE
JOSHUA TREE NAT'L. MON'T., FALL 1994

- 15a 1. Parking space for horse trailers along California Riding & Hiking (CRHT) at back country boards.
2. Enlarge parking area at Lower Covington Flat to allow horse trailer/vehicle parking.
3. Develop all existing horse trails as riding & hiking trails.
- 15b 4. Enhancement of Ryan Camp; return to horse use and allow for day use parking. Also add/establish a reservation system for Ryan Horse Camp. A fancy computer system for reservations is not necessary in our opinion. Black Rock personnel write them down on a clipboard, with success. A reservation system would manage visitation areas effectively.
- 15c Request that Ryan Horse Camp be given maximum amount of equestrian RV spaces; request Phase 1 priority instead of Phase 4 in GMP; and request a prominent sign specifying "Horse Camp" at Ryan horse trailer parking area.
- 15d 5. Provide adequate trail markers and trail maintenance (funding available for maintenance).
- 15e 6. Provide horse trailer/vehicle parking at trailheads - Desert Queen Mine, Pine City (both on same lot), and Boy Scout Trail.
- 15f 7. Maintain the Queen valley & Covington Flats dirt roads for 2-wheel drive. Upgrade Geology Tour Road to a 2-wheel drive route. Also remove rock barriers at Geology Tour Road & Pushawalla Canyon Trail to Pinyon Well. (Geology Tour Road & Pinyon Well was originally a horse trailer parking area).
- 15g 8. Adequate horse trailer parking for Pushawalla Canyon entrance from Indio Hills area for Coachella Valley equestrians and hikers.
9. Adequate horse trailer parking for Boy Scout Trail from Indian Cove area for 29 Palms equestrians and hikers.
- 15h 10. Continued access to Quail Springs area for local residents near Monument Manor.
11. Continued access to Black Rock Horse Camp from southwestern area of Yucca Valley and Morongo Valley, via Poleline Road.
12. Continued access by Yucca Valley locals to Black Rock via N/S entrance at wash one mile east of camp.
- 15i Additional comments: Presently, at Black Rock Horse Camp, we like the nice level parking available, as well as running water, restrooms, and the separation of the Horse Camp from the non-horse camp. A restroom facility directly adjacent to the horse camp would be appreciated.
- Due to the lack of the availability of water in the back country, overnight camping is not suggested, and water is not provided at Ryan Camp. Riding out of camp and returning each day, or day use, is best.
- Bicycle riding is permitted only on established roads.

- 15a. See response 14a.
- 15b. See response 14e.
- 15c. See response 14f.
- 15d. See response 14b.
- 15e. See response 14a.
- 15f. See response 14d.
- 15g. See response 14a.
- 15h. See response 14h.
- 15i. See response 14i.

mm

COMMENTS

RESPONSES

October 12, 1994



Ralph Johnson, Acting President
Santa Ana River Unit/BCHC
PO Box 810
Mira Loma, CA 91752

Ernie Quintana, Superintendent
United States Department of the Interior,
National Park Service
Joshua Tree National Monument
74485 National Monument Drive
29 Palma, CA 92277-3567

Dear Mr. Quintana,

I'm writing on behalf of myself, the members of the Santa Ana River Unit/BackCountry Horsemen of California, and other equestrians in general. I'm concerned that the current trend of negative legislation toward equestrians might influence future decisions in the draft of the General Management Plan (GMP) for Joshua Tree National Monument. Horses and mules are very much a part of our history, and it would truly be a shame to let negative feedback restrict horses and mules from Joshua Tree National Monument. Regardless of the neglect of a few, equestrians for the most part are responsible citizens, and do our best to preserve the beauty of the back country.

I realize that the purpose of the General Management Plan is to adopt a layout for Joshua Tree National Monument to guide natural and cultural resources management, visitor use, general development, park administration and operations for the next 10 to 15 years. I hope you take into consideration equestrians and our needs and wishes, too. I've included some general areas of equestrian concerns and wishes:

16a

- 1. Parking space for horse trailers along California Riding & Hiking Trails(CRHT).
- 2. Enlarged parking area at Lower Covington Flat, to allow horse trailer/vehicle parking.

16b

- 3. Develop all existing horse trails as riding & hiking trails
- 4. Enhancement of Ryan Camp; with a return to horse use and allow for day use parking. Also, add/establish a reservation system for Ryan Horse Camp. A reservation system would manage visitation areas effectively. Also, request that Ryan Horse Camp be given a maximum amount of equestrian RV spaces; request Phase 1 priority instead of

16c

16a. See response 14a.

16b. See response 14e.

16c. See response 14f.

COMMENTS

RESPONSES

Phase 4 in GMP, and request a prominent sign specifying "HORSE CAMP" as Ryan horse trailer parking area.

16d

5. Provide adequate trail markers and trail maintenance (funding available for maintenance).

16e

6. Provide horse trailer/vehicle parking at trail heads - Desert Queen Mine, Pine City (both on same lot), and Boy Scout Trail.

16f

7. Maintain the Queen Valley and Covington Flats dirt roads for 2-wheel drive. Upgrade Geology Tour Road to a 2-wheel drive route. Also remove rock barriers at Geology Tour Road & Pushawalla Canyon Trail to Pinyon Well.

16g

8. Adequate horse trailer parking for Pushawalla Canyon entrance from Indio Hills area for Coachella Valley equestrians and hikers.

9. Adequate horse trailer parking for Boy Scout Trail from Indian Cove area for 29 Palms equestrians and hikers.

16h

10. Continued access to Quail Springs area for local residents near Monument Manor.

11. Continued access to Black Rock Horse Camp from southwestern area of Yucca Valley and Morongo Valley, via Poleline Road.

12. Continued access by Yucca Valley locale to Black Rock via N/S entrance at wash one mile east of camp.

16i

13. At Black Rock Horse Camp, the level parking, as well as the running water, restrooms, and the separation of the Horse Camp from the non-horse camp is really appreciated. A restroom facility directly adjacent to the horse camp would be welcomed.

Please advise me if I need to get more involved in guaranteeing the rights of equestrians in the General Management Plan of Joshua Tree National Monument.

Sincerely yours,

Ralph Johnson
President SARU

cc: Regional Director
Western Regional Office
National Park Service
600 Harrison Street, Suite 600
San Francisco, CA 94107-1372

16d. See response 14b.

16e. See response 14a.

16f. See response 14d.

16g. See response 14a.

16h. See response 14h.

16i. See response 14i.

COMMENTS

RESPONSES

BACK COUNTRY HORSEMEN OF AMERICA

P. O. Box 597
Columbia Falls, Mt. 59912



NOV 17 1994 RECEIVED
Western Regional Office

<input checked="" type="checkbox"/>	Regional Director
<input checked="" type="checkbox"/>	Gen. Sec. Dir.
<input type="checkbox"/>	Operations
<input checked="" type="checkbox"/>	Res. Mgmt. & Plan.
<input type="checkbox"/>	Administration
<input type="checkbox"/>	Operations Eval.
<input type="checkbox"/>	Public Affairs
<input type="checkbox"/>	ED
<input type="checkbox"/>	Budget
<input type="checkbox"/>	Action Taken

PUBLIC LIAISON COMMITTEE
 Mylon Filkins, DVM, Chairman
 6485 White Road,
 Redwood City, CA 94061
 Work (908) 822 1180
 Home (908) 368 4754
 Fax. (908) 822 0671

November 15, 1994

Ernie Quintana
 Superintendent
 Joshua Tree National Monument
 74485 National Monument Drive
 29 Palms, California 92277-3597

Dear Mr. Quintana,

On behalf of the National Board of Directors of the Back Country Horsemen of America I am writing to endorse the Draft Recommendations for Horse Use - Joshua Tree National Monument as presented by Jane de Helsby.

Back Country Horsemen of America is an organization of horsemen in eleven western states - dedicated to the preservation of recreational stock use on public lands. I have enclosed a copy of our last national newsletter for your review.

Sincerely,

Mylon Filkins, D.V.M.

cc: Jane de Helsby
 P. O. Box 1041
 Yucca Valley, CA 92286-1041

Regional Director NPS
 608 Harrison Street Suite 600
 San Francisco, CA 94107-1372

17. Comments noted.

COMMENTS

RESPONSES

Olson -
OJ

[Redacted]
October 16, 1994

Regional Director
Western Regional Office
National Park Service
600 Harrison St. Suite 600
San Francisco, CA 94107-1372

Re: Draft General Management Plan for Joshua Tree National (Park) Monument

Dear Sirs:

After reviewing the draft document, I found much to commend the planners for. There are some good ideas. However, I have a number of suggestions for improvements, and areas where the plan can be strengthened in its protection and "people management" provisions.

19a

1. The west end entrance visitors center is very important. It needs to be constructed as soon as possible. My suggestion is that whenever possible, it is useful to place such visitors centers in already impacted areas. So, it needs to sit just inside the boundary, where there already are buildings just outside, or on a separate piece of land, apparently BLM owned, which is just a mile outside the boundary.

19b

2. I suggest that rather than building a large complex at Cottonwood on the south, that an expanded visitor center be constructed on public land south of the boundary, between the park and the interstate highway. Such a visitor center could be an interagency facility, with expenses shared with the Bureau of Land Management as a center where they could also provide additional information on the new wildernesses just south of the (park) monument - Mecca Hills, Orocopia, Chuckwalla. This is an area which is already receiving overflow camping, and a campground might be planned in connection with the visitor center.

Both of the above facilities need to be planned so that they are models of energy efficiency. Passive solar, active solar, convection cooling, earth-sheltered, low profile, low visible impact, and low water consumption are just a few of the concepts which need to be incorporated into the design. It should also be designed so that it is possible to establish shuttle service into the park from the various entry points. Whenever possible, such facilities should be established in conjunction with a cooperating organization/natural history association, etc., to reduce the fiscal load.

19c

3. There needs to be an addendum, or other description of how the planning for the additional 250,000 acres added by the California Desert Protection Act will be handled. This new acreage needs planning as detailed and thoughtful as the current plan. The two are obviously going to be interdependent documents, and it is certainly advisable

19a. See response 2d. The Park Service would undertake a separate study and environmental impact analysis to evaluate alternative sites in and outside of the park for the new west and south entrance visitor facilities.

19b. See response 19a. The study would also evaluate operating these visitor centers as interagency facilities.

19c. See response 2c.

COMMENTS

RESPONSES

to go forward with the planning for the existing monument acreage, but the public needs to know how it can be involved in the planning for the expansion acres. It is my understanding that this planning may take place in connection with BLM and other agency ecosystem planning. While I appreciate the efforts to do ecosystem planning, such plans should be subservient to the purposes of the parklands.

19d

4. Much more extensive planning needs to take place which takes into account that the (park) monument is susceptible to becoming an island, isolated from BLM or Forest Service units by intervening urbanization. Active planning for a variety of ecosystem corridors needs to be incorporated.

On the west end, possibly in connection with existing nature center lands, an open space corridor needs to be maintained to highway 62, where the San Geronio Wilderness Additions now extend to the west side of 62.

On the northeastern corner, there needs to be active planning for an open space corridor which crosses Highway 62. While there is wilderness on both sides of the highway, a multi-lane highway in the future could foreclose all opportunities for species passage across the highway.

To the southeast, the same active concern with connections with the desert lily sanctuary need to be monitored. While there has been some agriculture in this area, it is possible that these lands too, could be converted to housing development. An annual letter to CalTrans informing them of your concerns may keep them from cutting the (park) monument off by ill designed highways.

Along the southwestern boundary along the Little San Bernardino Mountains a corridor needs to be maintained to the Coachella Valley Preserve, for mutual support of the endangered species within the preserve, and threatened species within the (park) monument.

One such link is not sufficient, regardless of its location. There are a variety of habitats and their associated species within the (park) monument, and chuckwallas, tortoises, and lizards don't use the same terrain as riparian species, or bighorn sheep. Each type needs corridors.

19e

5. I am appalled that it appears that the plan will be permitting the placement of bolts in areas used by climbers. I do not distinguish between inside and outside wilderness. It is all within the park unit. I regret that it was ever allowed. This conflicts with the philosophy of Management of park resources for the long term sustainability of the resources.

Is the rock less important than a flower? Removing any vegetation is not permitted - even picking a flower is not acceptable. How can placing a bolt be acceptable? Is the destruction of vegetation around the base of a boulder which has new bolts less important than picking a flower?

19d. See response 2b.

19e. See response 8e. The continuation of existing management guidelines also allows bolting outside of wilderness areas in the park. The climbing management plan will comprehensively address climbing issues throughout the park including bolting.

COMMENTS

RESPONSES

Is the rock less important than putting a grate over an abandoned mine hole? An environmental review is necessary for such an action. Shouldn't the placement of a bolt, and the associated changes in use patterns, also require individual environmental review?

Is the placement of a new trail on a rock face, visible to anyone within the vicinity to be permitted at the whim of any climber with a drill? Would a hiker tired of following the existing trails be allowed to place cairns or rock piles to mark a new foot trail he thinks others might enjoy hiking, or so he can safely find his way back to his car?

What happened to the "LEAVE NO TRACE" ethic? With increasing visitor levels this becomes ever more important. Leaving bolts is more intrusive than leaving chalk marks -- neither is appropriate. I recall arguments about lug soles not being appropriate in some places because they dig into the soil too much -- so, we leave the lugs at home.

I give no credence to the supposed argument that such use is "traditional." How long does it take to make it "traditional?" A decade? Bolt use is very new. "Traditional" climbers didn't use them. It used to be traditional to gather dead and down vegetation for campfires, and have big bonfires for everyone to sit around at night. The Firefall at Yosemite was traditional. It was traditional to go out to the desert and gather cacti to take home for your garden, too, at one time, or dump your oil alongside the road, or to drive your ATV anywhere you wanted. Times and standards change. The standards become more strict when the new use is determined to be destructive.

New technology which makes some things possible which were not previously feasible does not mean that they should be done. Not every rock needs to be climbed. Some may remain for future generations. A distance runner uses the best technology possible to train and bring his body into better condition, but the fight is between the person and the clock. If climbing is turning into a "sport" as some have said, then it behooves the sporting community to establish standards for their "sport" which do not rely on artificial aids. The runner who does the dash in 10 seconds doesn't get to count his record if the wind is at his back. How can a technically aided climb be acceptable?

And finally, to the aesthetics. How can a sport which relies on defacing rocks for the ages be acceptable? There are some classic rocks and photo spots within the monument. Would they be equally appealing with a string of bolts on them, and the coloring different where the rock has been spalled off from bad bolt placement? Slicing across the face of a boulder with a string of bolts is equivalent to taking a razor blade to the Mona Lisa. It might not be visible to many, it might be repairable to some degree, but the scar is there, and the life of the painting is shortened, as is the life of the rock. It is a sad and pitiable world where such destruction goes unchallenged.

COMMENTS

RESPONSES

19f

6. Shuttle service needs to be available on a more extensive route scheme than that presently envisioned. I noticed that the local market will support a \$3.00 fee for a ride

from 29 Palms to the Marine Base. Surely on heavy weekends, especially in the spring when roads become clogged with cars full of people who want to stop and look at the wildflowers, the market could support a scheme of shuttle busses that move people through the park to the flower fields and back to their cars. It seems preferable to widening roads. Whether subsidized or full fee, I can imagine lots of drivers who would rather look at the flowers than worry about traffic.

We see in the plan the result of neglect and low funds distributed to the "monument". Everything from replacing pipes to plans has been delayed for decades. Hopefully the new "PARK" will now get more of the attention and funding it deserves.

Please keep me informed of progress of this and all associated plans. Whoever compiled the list of organizations or individuals to receive copies of the draft plan has an extremely poor list. To have ignored the Desert Protective Council, which was formed 40 years ago specifically to defend Joshua Tree from a cross park highway and from further mining encroachments, and the Sierra Club, which has been having regular meetings with the last 3 superintendents was a serious oversight. One wonders who else was dropped off the list.

Sincerely,

[Redacted signature]

cc: Ernie Quintana
Phil Lundgren

19f. See response 10h.

COMMENTS

RESPONSES

20a. See response 8a.

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November 3, 1994

Stanley Albright, Regional Director
 Western Regional Office
 National Park Service
 600 Harrison Street, Suite 600
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RECEIVED 11-8	
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Re: Draft General Management Plan - Joshua Tree National Park (nee Monument)

Dear Mr. Albright:

I appreciate the opportunity to review and comment upon the Draft General Management Plan (GMP) for Joshua Tree National Park. I also wish to extend my gratitude to Supt. Quintana for meeting with me personally to discuss the GMP.

Generally, the GMP is a sound document that identifies and attempts to address a number of important issues facing Joshua Tree. Nevertheless, there are some significant problems with the plan, particularly in the area of parking and camping. Unfortunately, the multiple change-over in GMP planning personnel may have contributed to these problems, many of which were identified in 1991 in connection with the road improvement proposal.

20a

L. CAMPING The GMP proposes to place all camping in the Park on a reservation basis. This proposal is extremely ill considered, and I am actually unaware of any NPS unit that has actually placed all camping on a reservation basis. An all reservation proposal will offer no means of reassigning campsites to "no-shows". More importantly, at Joshua Tree such a restrictive reservation system is neither needed or desirable.

Joshua Tree's prime visitation season runs from mid-October through mid-April. Most visitors hail from the local Southern California area. Few, if any, campers come to the Park on planned family vacations. This is especially true for tent campers (the vast majority).

Some visitors would benefit from being able to reserve sites. These include large groups and horse users. Currently, group campsites are obtained by reservation. It would make sense to expand the reservation system to include horse users, since they must haul large trailers and are limited to the use of specific sites. The GMP wisely proposes to set aside, in a separate loop area, horse sites. As part of this planning, these sites should be restricted to horse users and be obtained on a reservation basis. Reservations for selected sites at selected campgrounds may also make sense.

Stanley Albright, Regional Director
 November 3, 1994
 Page Two (2)

II. PARKING AND ROAD IMPROVEMENTS

The parking plan set forth in the GMP comes almost without alteration from Joshua Tree National Monument, California, Environmental Assessment, Reconstruction of Park Routes 12, 13, and 112, Associated Visitor Use Areas, August 1991 (the "1991 Road Plan"). As you may be aware, the 1991 Road Plan was the subject of resounding criticism by the public and environmental groups.

In response, the NPS and some former members of the GMP Planning Team met with public representatives and toured the affected road and parking areas. Numerous comments were received concerning parking and road improvements, many of which are mirrored in this letter. However, it appears that none of these concerns and comments were addressed or have been incorporated into the GMP. Prior to preparation of the GMP, the current GMP Team Captain had never visited the Park.

PARKING

The GMP states that "Parking lots would be linked to visitor destinations." Despite these stated goals, the GMP eliminates numerous existing parking sites and hence access to visitor destinations. The GMP also combines some lots in such a manner that user conflicts are created, and unnecessarily locates some lots in previously non-impacted areas. Just as importantly, creation of some parking lots will dramatically increase visitation and related impacts to Park resources that are currently lightly visited.

The maps in the GMP which show roads, parking and other features are extremely poor and inaccurate. Without specific consultation to the 1991 Road Plan, the locations or design of specific parking areas is nearly impossible.

A. Elimination of Parking and Access - West Entrance to Quail Springs Picnic Area

Numerous parking areas, informal, dirt lots with concrete barriers, and paved are eliminated in the GMP. For instance, there is no parking provided from the West Entrance to Quail Springs Picnic Area. As is shown in the attached maps, a number of visitor destinations exist along this six (6) mile stretch of road. Specifically:

1. **Lizards Landing Turnout.** This long-existing parking area is located approx. 1.8 miles southeast from the West Entrance (See Map #1). It is the only access point for climbing and hiking trails. Numerous horse trails are also found in this area. **Recommendation:** Provide 2-3 car parking at existing location.

20b. See response 8c.

20b

COMMENTS

RESPONSES

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November 3, 1994
Page Three (3)

2. Various Parking Areas for Samuelson Stones and Negropolis Area. Several small to medium size dirt and one paved lot are found commencing about 3.3 miles southwest of the West Entrance. These lots provide hiking access to the Samuelson Stones to the west (see page 160 of GMP), hiking and scrambling along the Negropolis Hill and climbing access to areas along the Negropolis Hill. (See Map #2) **Recommendation:** Provide three (3), turnout oriented, parking areas, approx 4-5 car each, in addition to planned scenic turnouts.

3. Vagmarken Hill Parking One medium sized (6-7 car) dirt lot is found on the west side of the Park road approx. 5.5 miles from the West Entrance. It provides climbing and hiking access to Vagmarken Hill area. (See Map #2) **Recommendation:** A 5-6 car, turnout type, parking area should be provided in the currently impacted area. A 3-4 car turnout should be provided approximately .5 miles further along the Park road for climbing access extreme right-end of Vagmarken Hill.

20c

B. Elimination of Parking and Access - Quail Springs Picnic Area to Hidden Valley Campground.

1. Roadside Rock Parking. A small turnout area exists approx. .75 south of Key's Corner (Boy Scout Trailhead Lot area), adjacent to a rock formation along west side of the road (at a left-hand curve in the road). Provides parking for multiple climbing opportunities in this area (including the referenced rock formation). (See Map #3) **Recommendation:** A small 3-4 car turnout type area is needed here.

2. Lost Horse Ranger Station Road (GMP Lot 4A) - Hemingway Buttress Area. A 20 car lot is proposed along the Lost Horse Ranger dirt road to provide access to the Hemingway Buttress climbing areas (Lot 4A.). The 1991 Road Plan (and hence the GMP) did not want to place any parking along roadways. The long established parking area for Hemingway Buttress is located along the Park road, about .4 mile past the Lost Horse road. (See Maps #3 & 4) A marked trail system leads from this lot to several highly popular climbing areas. The proposed lot is located at the site of other existing parking for other climbing areas adjacent to the Lost Horse Ranger road. The Proposed lot would eliminate the existing Hemingway parking area and trail system.

The new lot would significantly increase (2 to 3.5 times) the approach to the climbing areas, create the need to develop new trail systems (causing new impacts), and provide an inadequate number of parking spaces (due to combining with an existing lot for access to other areas). There would also be a tendency for climbers to approach the multiple rocks not from the current single parking area along a marked trail, but from multiple "turnouts" along the Park road. This would lead to creation of multiple and intersecting braided trails.

20c. See response 8c. Parking between Quail Springs and the Lost Horse ranger station road would include lots at Quail Springs picnic area, Boy Scout trailhead, and Wonderland of Rocks - orientation west (approximately .25 south of Boy Scout parking area), in addition to pulloffs about every .25 mile.

COMMENTS

RESPONSES

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Page Four (4)

Recommendation: Provide paved parking at existing Hemingway parking area (better defined) 15-20 cars. Keep existing parking along Lost Horse Ranger road for access to rocks adjacent thereto.

20d

3. Lost Horse Ranger Station Dirt Road. The GMP does not address parking along the Lost Horse Ranger dirt road. Multiple dirt parking areas exist and provide access to many popular sites. Not part of the backcountry, this should be discussed in the GMP and planned accordingly.

4. Milepost - Playhouse Rock Parking. A small 4-5 car dirt parking area exists on the west side of the Park road, approx. .7 miles past the Lost Horse dirt road, just past a 50 foot pillar west of the road. (See Maps #3 & 5) This parking area provides access to Playhouse Rock and several other climbing area. Playhouse Rock is very popular with beginning/novice climbers. The GMP eliminates this lot. **Recommendation:** Pave and define parking area, turnout style or otherwise, for 4-6 cars.

5. Dihedral Rock Parking. Currently roadside parking is utilized by climbers to access the very popular formation known as Dihedral Rock. (See map # 5) Multiple small turnouts will lead to indirect approach and intersecting braided trails. **Recommendation:** A 4 car pullout would suffice to provide access, develop marked trail.

20e

6. Hidden Valley North Lot (GMP Lot 6). It is impossible to ascertain where this lot is to be located with any certainty. A dirt lot does exist in this general vicinity. It is impossible to comment upon the propriety of this parking area until its location can be determined. Better maps would have helped.

C. "Wonderland of Rocks Backcountry Staging Area" GMP Lot 2B.

20f

A large parking area (75 car, 5 RV) is planned at the Echo Tee area, along Barker Dam Road (GMP Lot #28). This area is the most popular climbing site in the entire Park. The inadequate existing parking in this area (approx 45 cars) is essentially consolidated into one lot. It is important to note that 75 cars is considered to be the current expected parking needs for this area on most weekend days. Nevertheless, the current "wait lot" for the Keys Ranch Tour (10-12 cars per tour) would be eliminated and be added to the mix. A 20-25 car capacity increase (over current) would result.

20g

However, as is discussed below, the paving of Bighorn Pass Road will dramatically increase vehicular traffic (3 to 5 times or more). With rare exception, RVs do not travel the narrow dirt Bighorn Pass Road. Even without paving the road, or addition of the Keys Ranch Tour "wait lot", the new planned parking would be barely adequate. As planned, severe congestion and user conflicts (climbers, Keys Ranch Tour and new visitors) will result.

20d. The plan addresses parking along the primary paved park roads in the most heavily used areas of the park. Trailhead parking areas along secondary dirt roads would be retained.

20e. See response 8c.

20f. An expanded parking area would be provided at Echo T. Vehicles would still be allowed to park in a dirt lot near Echo Cove that is limited by the topography. The plan has been revised to maintain the separate Keys wait lot.

20g. See response 20i.

COMMENTS

RESPONSES

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Page Five (5)

Recommendation(s): (1) Place Keys Ranch Tour "wait lot" elsewhere. Perhaps lengthwise, parking along road between Hidden Valley C.G and the planned lot (#28).

(2) Place spur (entrance) to Lot 28 further north, to the north (left) of the "T" in the road, and where those driving to Barker Dam will not mistakenly enter.

(3) Do not pave road to Barker Dam (see below).

D. Barker Dam & Wall Street Mill Parking (GMP Lot 26).

20h

Two existing parking areas (Barker Dam and Wonderland Ranch) are consolidated into a new lot: GMP Lot #26. The new lot will be placed on a previously non-impacted area roughly halfway between the two existing lots.

The Barker Dam lot is currently heavily used by a multitude of visitors. Some come to see Barker Dam, some to hike the nature trails, some to see the petroglyphs, some to climb. Visitor stays are typically short. The Wonderland Ranch parking area is used almost exclusively by backcountry hikers and climbers (a few visit the Wall Street Mill). Stays are typically very long (most of the day, if not all day). It is important to note that the Wall Street Mill is currently not referenced by any Park visitor literature or privately published Park visitor guidebooks. Little information can be found on this historic site. Hence visitation is light, and impacts generally limited.

20i

Combining the two lots, in conjunction with paving the Barker Dam road, will (1) lead to user conflicts between backcountry users and limited stay visitors. (2) Parking capacity will quickly be exceeded, as the paved road draws 3 to 5 times (or even more) as many vehicles, including RVs (which are currently rarely seen). (3) Visitation to the Wall Street Mill will dramatically increase (since this site will apparently be "promoted"), as will vandalism to the structures and artifacts and to the lightly traveled desert environment.

No formal trail system or signage exists to or at the Wall Street Mill. This result is in contradiction of the stated goals of the Backcountry Management Plan (and federal law) to protect the Mill site as a sensitive resource area.

Recommendation(s): (1) Keep Barker Dam and Wonderland Ranch/Backcountry parking areas separate, including keeping access to Wonderland Ranch parking along separate dirt road.

(2) Despite concerns about runoff and possible archeological sites near the existing Barker Dam lot, retain this area for Barker Dam

20h. The plan has been revised to consolidate these two lots but at the Barker Dam lot. See response 6r.

20i. See response 8g regarding the planned strategy for addressing increasing use. Wall Street Mill is a significant historical resource that is proposed for preservation and interpretive use. Although the trailhead would be pulled back farther from the site, visitation would probably increase, which would result in increased encounters with other hikers. Affects on the resource would be mitigated as described in the cultural resource impacts section. A single, clearly marked, designated trail would be established to minimize social trails to and through the site. Additional actions to reduce impacts would include informational and interpretive signs at the site.

COMMENTS

RESPONSES

Stanley Albright, Regional Director
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Page Six (6)

parking. The environment and any possible arch. sites are hopelessly compromised already.

(3) Do not pave Barker Dam road.

E. Mohave Plants Exhibit (GMP Lot 12).

20j

This is not a parking area for the "oyster bar". It is a parking area for the Love Nest/Planet X areas. An established and marked trail system leads to these formations east of the road. The exact location of this lot should attempt to coincide with the trail.

F. Ryan Turnout (GMP Lot 21).

20k

Page 40 states that this lot is to be eliminated, the chart on page 48 states that it will be a 16 car site. This is the Oyster Bar parking area. A marked trail leads to these popular formations. It should be retained.

G. Geology Tour Road, Desert Queen Backcountry (GMP Lot 24).

20l

There is strong intimation that dirt road access to the Desert Queen Mine will be eliminated. A popular destination for many people, the dirt roads should remain open to those who wish to experience these historic mines.

ROADS

20m

As stated above, I question the wisdom of paving the narrow dirt road to Barker Dam. The GMP fails to address the environmental consequences of paving the road (social & biological). Paving this road, combined with a separate signed turnout for the road (one must now go through the Hidden Valley Campground to access the road), will dramatically increase usage and visitation to Barker Dam and the surrounding backcountry. Currently it is a rare RV (if any) that ventures out to Barker Dam. Traffic is generally light. A 3 to 10 times increase of traffic can be reasonably expected.

It is certainly desirable to eliminate the majority of "through" traffic that kicks up dust in the campground which results from the existing access to Barker Dam. However, the extensive paving of this road (and new road alignment) is not the solution.

Recommendation: Pave road to new campground entrance only.

20j. The location of parking for the Oyster Bar and Love Nest has been corrected in the plan.

20k. This lot would be retained and the plan has been corrected to state this.

20l. The plan has been revised to clarify that dirt road access to the Desert Queen Mine would be maintained. The network of dirt roads in Queen Valley would be evaluated and any redundant routes would be closed and revegetated or converted to trails.

20m. See response 20i.

COMMENTS

RESPONSES

Stanley Albright, Regional Director
November 3, 1994
Page Seven (7)

III. INACCURATE AND BIASED COMMENTS CONCERNING CLIMBING

20n

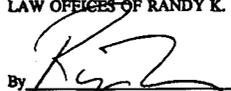
The GMP discusses climbing (but not other user groups) in a biased and inaccurate manner. These statements are found on the following pages: 13, 22, 170, 187, 188 & 189. In particular:

- (1) Calling bolts "rock defacing expansion bolts" [p22] is incorrect and biased. Those familiar with bolting do not hold this opinion (including NPS personal).
- (2) The "temporary" ban on bolting and replacement does preclude use of existing routes [p170]. Many old anchors are unsafe and need replacement. Bolts have failed since the ban, resulting in injuries and rendering routes unclimbable.
- (3) Most bolted routes can not be climbed "using alternative methods" [pp170, 187, 188 & 189]. This statement is just completely false. Some climbs have no means of reaching the summit except by the [bolted] route. Many climbs can not be safely top-roped due to the overhanging nature of the rock or traversing nature of the route. The statement demonstrates a complete ignorance of climbing. As such, it is clearly biased and misinforms the public and those who rely on this document for impartial and accurate information to make or comment upon management decisions.
- (4) No other group, despite the nature of their impacts (e.g.: horse users) is singled out as are climbers.

I would be happy to discuss any of these comments with members of the Planning Team, Park staff or other NPS personnel. Please feel free to contact me at the number listed above.

Very truly yours,

LAW OFFICES OF RANDY K. VOGEL

By 

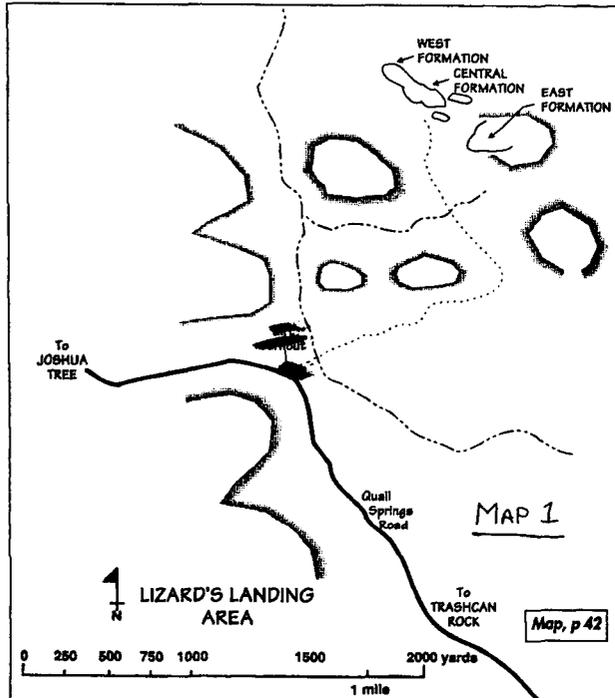
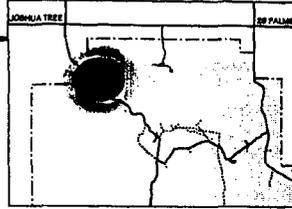
Randy K. Vogel

RKV:rr

20n. Wording regarding climbing has been revised.

LIZARD'S LANDING

This area lies .75 mile northeast of the main road into the Joshua Tree National Monument (Quail Springs Road). You'll find Lizard's Landing at a point about 1.8 miles (2.9 km) towards Hidden Valley Campground from the Joshua Tree entrance to the monument. A small pullout is on the left side of the road just where the road makes a sharp right (southerly) turn. Several approaches are possible. From the parking area, you can hike northeast along an old road (100 yards) to a gravel pit. The easiest approach is to head east-northeast about .5 mile up the low hillside, skirting to the east of the hill ahead. From here, head roughly north (and slightly west) .4 mile over low ridges to the Central Formation. An alternative approach (longer and rougher) begins at the gravel pit and

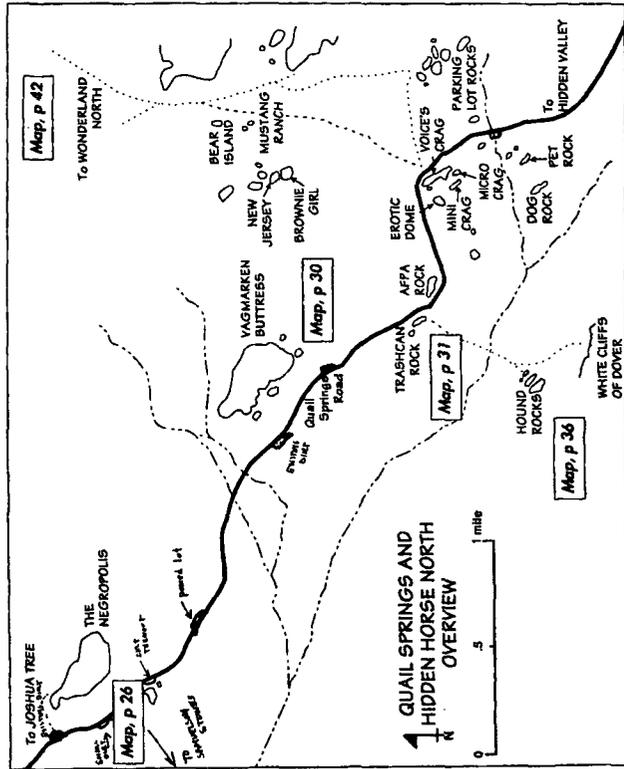


COMMENTS

RESPONSES

28

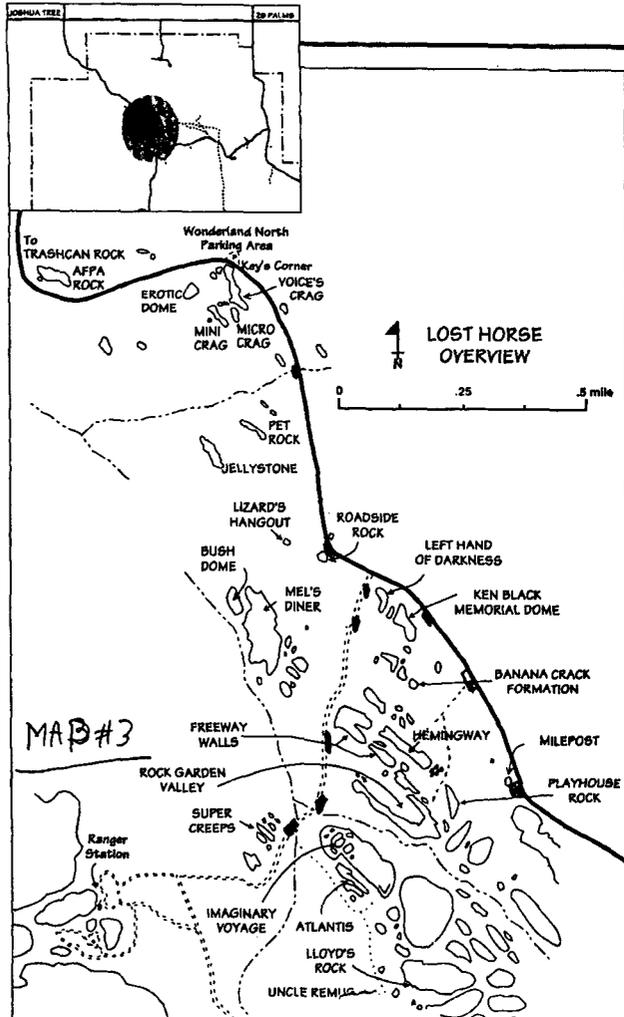
QUAIL SPRINGS



VAGMARKEN HILL

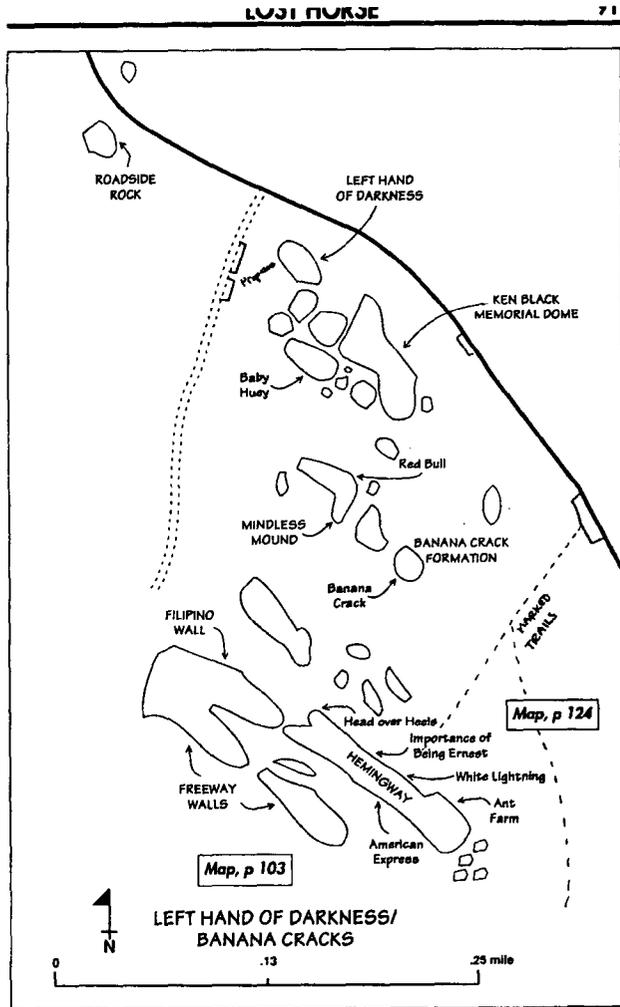
Vagmarken is the large hill that comes into view approximately 5.5 miles past the Joshua Tree Entrance to the monument and 1.2 miles before you reach Trashcan Rock. It is on the left (east) side of the road. The known routes lie either on small brown formations on the lower left-hand (northwest) portion of the hillside (The Intimidator Rocks), or on the larger buttrisses (Vagmarken Buttrisses) to the right and higher on the hillside.

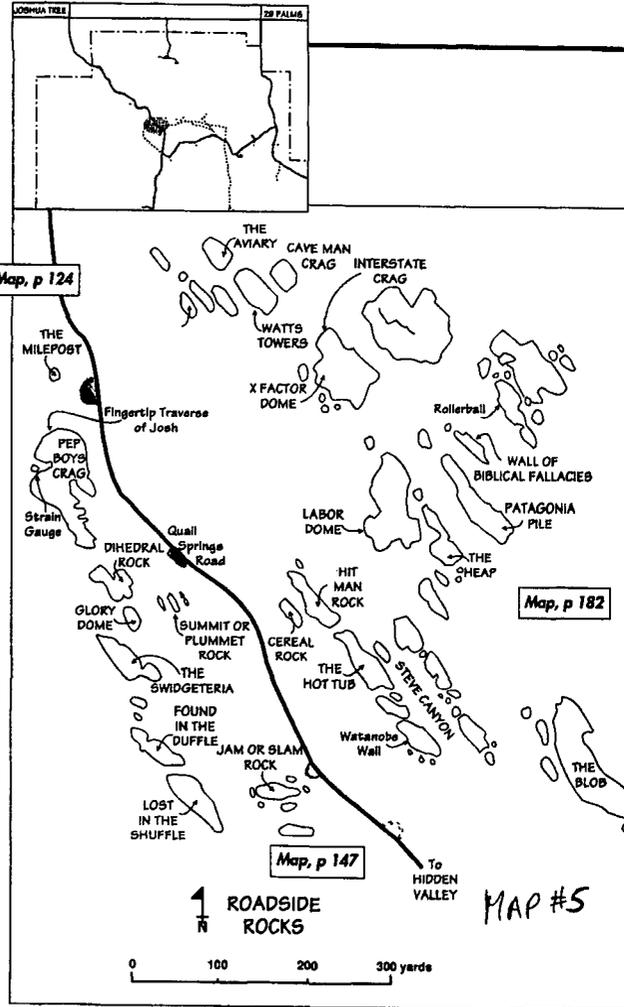
MAP #2



COMMENTS

RESPONSES





COMMENTS

RESPONSES

ALSON
D/S

Comments Regarding the
Draft
General Management Plan
Development Concept Plans
Environmental Impact Statement
for
JOSHUA TREE NATIONAL MONUMENT

by [REDACTED], October 22, 1994

As a long-time visitor to Joshua Tree and author of a general visitor's guidebook on the monument, I have reviewed the subject plans and EIS with great interest. As I consider Alternative A (the Proposed Action) to be the most likely to be adopted, and hence the most carefully documented, I will address all comments herein towards that proposal.

In general, I am in agreement with the document's statements with respect to shortcomings under the present management system and associated inadequate visitor facilities. Visitation has continued to increase, with little improvement in the physical plant of the monument, leading in some instances to resource damage and negative impacts on visitor enjoyment. The Alternative A proposals represent an admirable attempt to correct this situation.

In many areas the plan still remains too general. While this may be the nature of a "general" plan, the lack of specificity often means a lack of compliance in the long run. A number of comments that follow, both under the general comments section and the specific comments section address this issue.

GENERAL COMMENTS:

21a

Plan Implementation: Does adoption of the plan trigger a concomitant budgetary commitment by the Park Service to implement the plan?

21b

Bolting Ban: (see pp. 13, 22, 187) The plan states that a ban on bolting in wilderness areas shall be in effect pending the results of an on-going study. Limiting the coverage of the ban and study to only wilderness areas is insufficient, as the majority of bolting activities occur in non-wilderness areas near

21a. Implementation of actions in the plan would be dependent on funding levels approved for the park. One criteria for funding an action is its inclusion in an approved plan.

21b. See response 8e.

road corridors and campgrounds. Per existing park policy, any individual climber makes his or her decision of placing a bolt, and can in effect place as many bolts at as many locations as they feel are required to support their level of climbing ability. This opens up the serious philosophical question: Should the Park Service allow each individual park visitor to place permanent fixtures on park features, even if based on a safety concern? By extension, should individuals, or groups, then have the right to install safety rails, chains and cables, again based upon their own personal assessment as to safety requirements? My own concern, as with many park visitors, is with the visual pollution created by bolts. I am affronted by bolts on rocks in the campground every bit as much as I am by their presence in an official Wilderness Area. While I cannot offer a solution to the bolting problem, I strongly recommend that the Management Plan extend some kind of interim control of bolting in non-wilderness areas, and that the follow-up bolting plan cover the entire monument.

I believe that the climbers themselves should be made part of the solution, perhaps in the form of a consulting committee to the Park Service. If bolts are really required, they should be placed only by permit (except, of course, in an emergency situation). The Park Service should establish some basic criteria or guidelines on what would constitute an acceptable bolting, and the first permit review could be performed by the Climber's Committee. A sufficient open review period on tentatively approved bolt applications should be established to allow the general public to comment before a final decision is made. Such an arrangement would have to be carefully worked in order to avoid the possibility of liability on the part of the Park Service.

Historic Properties Management: (pp. iv, 181) The plan acknowledges throughout that adverse impact will occur on five historic properties by allowing natural deterioration. No justification is presented for this position, and only passing reference is made to a "cultural resources management plan" on p. 181. The reference, in lower caps with no record of this document in the bibliography, gives the appearance that little consideration has been given to historic preservation. A pertinent summation of policy established by the Cultural Resources Plan should be included in the General Management Plan, either directly in the text or as an appendix. See the Specific Comments section of this document for further discussion regarding this issue as it pertains to specific sites.

Interpretive Program - Outreach Program: (p. 31) Many of the interpretive program objectives could be greatly aided by expanding the roles of the Cooperating Association (Joshua Tree Natural History Association) and nearby educational institutions (e.g., Palm Springs Museum, UC Riverside, Cal State University at San Bernardino, College of the Desert, Copper Mountain J.C.). A self-funded field study program, similar to those developed at Grand Canyon, Yosemite and Sequoia, should be undertaken at

- 21c. See response 6k. Management of cultural resources is a component of the Resources Management Plan.
- 21d. The plan has been revised to state that the park would involve the Joshua Tree National Park Association to address operational needs of the park.

21c

20d

COMMENTS

RESPONSES

A. Cites. Comments to General Plan

Page 3 of 8

Joshua Tree. Not only can field study courses augment the interpretive programs offered by the Park Service, they can also be used as a staff training vehicle.

Rehabilitation: (P. 22) The commitment to backcountry rehabilitation and inholding acquisition/rehabilitation is a positive move. The plan would be strengthened by identifying some specific projects.

21e

Visitor conflicts: The plan does not clearly identify what these conflicts are or how they are to be resolved. In several instances, modifications in campground layouts and parking are cited as a method of separating users, but again in only a general context. Are we talking about rock climbers vs. other users? It is primarily parking and campground space? And how is this resolved on a site-to-site basis around the monument?

21f

Interpretive Program - Themes: (pp. 9-10) "Leave No Trace" ethics should be added to theme 5, as this movement is gaining great momentum in other desert units of the National Park system. Minimizing human impact on both the backcountry and the developed corridors of Joshua Tree will be critical as visitation rates continue to increase. The adoption of the "leave no trace" philosophy in the general plan, and its strong delivery to park visitors, has particular application in the issue of bolting. "Leave no trace" visitor skills should be encouraged through free publications, displays at each visitor facility, and be incorporated into the interpretive brochure given to visitors at the fee stations. This activity will best stem from a strong statement in the general plan.

21g

Interpretive Program - Special Programs Implementation: The concept of costumed interpretation at Keys Ranch, or indeed at any of a number of historic sites within the monument, has great appeal and has proven very successful at other units of the National Park Service. However, I believe that such programs usually have fallen under the direction of the cooperating association, as in fact have many specialized tours (e.g., crystal caverns tour in Sequoia). While the Park Service would maintain ultimate control of the activities at Keys Ranch, placing the day-to-day operation of tours under the aegis of the Natural History Association should be stated as an option in the plan.

21h

Visitor Center - Location/Construction: (p. 31, p. 137) The reasons given for rejecting the "partially subterranean circular museum/visitor center" on p. 137 may have been valid for the Pinto Basin site, but they do not necessarily apply to the West Gate site. Surely, some of the high cost associated with the Pinto Basin proposal was associated with establishing electrical and water utilities deep in the heart of the monument. These costs would be minimal for the West Gate location, adjacent as it is to the community of Joshua Tree. Since the majority of park visitors enter through the West Gate, I consider it imperative to put the new visitor center into service as quickly as possible.

21i

21e. Specific programs would be identified and priorities would be set in the Wilderness and Backcountry Management Plan.

21f. See response 6f.

21g. This has been added.

21h. See response 21d. The specific activities that would involve the cooperating association would require operational decisions.

21i. See response 6o.

COMMENTS

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A. Gates, Comments to General Plan Page 4 of 8

If postponed pending upgrading of other facilities, it probably will never be built. This is simply one of the most effective ways to educate the average visitor about the natural history of the park and inculcate their own sense of personal stewardship. Now that the Monument has been enlarged and upgraded to Park status, it seems even more critical to create the best visitor center possible.

Campground Capacity: (p. 137) The problem of campground capacity is mentioned numerous times and quite rightly so. The only real solution offered is to encourage off-site camping (p. 34), but no details are provided. Will the Park Service help private campground developers obtain permits? I suggest that the Park Service enter into a Memorandum of Understanding with BLM to establish nearby "overflow" campgrounds on adjacent BLM lands.

21j

Camping - Primitive: One camping issue not addressed by the plan is the possibility for primitive camping in a backroads environment (similar to Death Valley). The addition of lands on the southeast side of Pinto Basin as the result of the Desert Protection Act could make this a possibility in the area accessed by the Black Eagle Mine Road. This area is crossed by many old mine roads which might make it suitable for this activity. The lower parts of Little Berdoo Canyon might also support this type of activity. One length of the Pinkham Canyon route, heavily impacted by old mining activities, could also be considered. In short, there should be a survey of possible locations in the monument. If none are found suitable, then at least the issue will have been addressed and disposed of.

21k

Trail Bikes: (p. 34, p. 105) The issue of trail bikes, with their attendant capacity for damaging the desert environment, is not adequately addressed. The principal statement says that trails will be open to bicycles "where appropriate." In the open desert flats characteristic of most of the monument, where trails are unconstrained by natural barriers, mountain bicycle travel in any and all directions is accomplished with relative ease. It is doubtful that any trail in the monument is suitable for this type of unsupervised activity. Bicycles should be limited to paved roads, dirt roads, and 4-wheel drive routes. Joshua Tree should not make the mistake that Moab, Utah, did in making this type of recreation overly welcome. There, the resources are beginning to take a real beating as ever greater numbers of bicyclers are lured to this self-promoted mountain-bike center. Taking a strong stand now to greatly limit bicycling will prevent future problems.

21l

Four-wheel Drive Road Maintenance: Four-wheel driving is barely touched upon in the plan other than the mention that some routes will be left open. Will NPS maintain these routes, or allow 4 wheel drive clubs to maintain them? Will maintenance of any kind be allowed?

21m

21j. See response 6m. The Park Service cannot obtain permits for private developers. However, park management could make recommendations to permitting government agencies in support of these types of developments. Establishment of additional campgrounds on BLM land would not necessitate a memorandum of understanding.

21k. Backcountry camping as well as issues pertaining to land added to park would be addressed in the Wilderness and Backcountry Management Plan.

21l. See response 6g.

21m. Four-wheel-drive routes would be designated but not maintained.

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B. Dates. Comments to General Plan

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21n

Natural Resource Plan(s): There are several interagency ecosystem management plans that touch upon the monument. The report should reference these (both in text and bibliography), and describe how the monument's plans intermesh with these. Is there mutual agreement/compatibility in the plans?

21o

Park Additions (Desert Protection Act of 1984): The plan should be quickly amended, even if only with a tentative plan, for management of the 200,000+ acres added by the California Desert Protection Act. In particular, due to the potential Kaiser mine landfill, the major Eagle Mountains and Coxcomb additions require special attention with regard to establishing a wildlife census baseline.

Report Organization: I assume that the document has been prepared in accordance with an approved government style standard, but I found the organization and format made for difficult reading. Simply numbering the tables and maps, and then referencing them by number in the text, would greatly aid the reader. For example, on my first two read-throughs, I failed to note the table of listed sites on the National Register of Historic Places on pp. 28-29, the only place in the document linking the recommendation to allow "natural deterioration" to specific sites by name; yet, deterioration of five sites is mentioned in the text a number of times, but it is never linked to the table. The Bibliography is inadequate. It contains extraneous listings and fails to list many of the documents referenced in the body of the document (e.g., Cultural Resources Management Plan, interagency ecosystem management plans). The index should be expanded to include all named sites in the text.

21n. See response 2b. These plans are not referenced because they have not been completed.

21o. See response 2c and 6t.

COMMENTS

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SPECIFIC COMMENTS:

Lost Horse Planning Unit - Keys Ranch: (pp. 30, 70, 102-111) Page 30 states that Keys Ranch "would be stabilized and developed as the primary location for cultural history education." The only specific given is the suggestion that the ranch would lend itself to costumed interpretation, with tours to continue to be given by the Park Service. It is doubtful, given the fragility of the historic fabric of Keys Ranch, that it could be developed in this way. Conducted tours are rightly kept to small groups that can be monitored to minimize theft of artifacts. Even at this level, there is a slow loss of integrity in the site. Added development would hasten the process. Finally, the use of Keys Ranch as "the primary location for cultural history education" appears to go counter to the development of the Twentynine Palms facility for this express purpose. While cultural education should represent an important facet of interpretation in the "core area," the primary focus for this type of activity should be directed to the Twentynine Palms cultural facility. In the core area itself, the historic resources would be better served by developing a local focal point at Ryan Ranch (already heavily impacted) or even by a small museum at Lost Horse Ranger Station, but not by more development and associated visitation of Keys Ranch.

21p

Lost Horse Planning Unit - Barker Dam/Wall St. Mill Parking: (pp. 45, 102-111) The map on page 45 does not adequately locate the present Barker Dam and Wall St. Mill parking areas. My interpretation is that the proposed new and consolidated parking lot lies approximately half-way between the present trailheads. No convincing need is presented for this action that appears to disturb a new area to create the consolidated parking lot, nor does the plan specifically state that the old lots will be rehabilitated. If the primary goal is to create more parking capacity, it makes more sense to enlarge the already impacted Barker Dam lot and close off the Wall St. Mill access road altogether. If this were done, a trail could be constructed from the Barker Dam lot to the Wall Street Mill. This longer trail would also be more effective at warding off casual vandals who usually don't like to walk very far.

21q

Lost Horse Planning Unit - Wall St. Mill: (pp. 102-104) This ruin and its associated collection of artifacts (tanks, tools, old cars, structures) is extremely vulnerable to vandalism. The plan does not adequately describe how the resource will be interpreted and protected. Unescorted visitors will venture into the structure of the mill, as they always have. A carefully designed trail, which would provide access into a small portion of the structure, might satisfy this craving. Also of concern in developing this resource, is the protection of the Keys/Bagley shooting monument. This stone could be easily carried off by a couple of men, or defaced in situ. Its only protection to date has been the relative secrecy of its location. Some thought should be given to its security. Without great care, the entire Wall St. Mill complex could rapidly deteriorate under heavier visitation.

21r

21p. The plan has been clarified to state that guided tours only would continue and visitors would be prohibited from entering the structures. There would be no new development at the site. Keys Ranch would be the primary location for cultural history education in the interior of the park and Twentynine Palms cultural center would be the primary site for cultural interpretation.

21q. Se response 6r.

21r. See response 20i.

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B. Cater, Comments to General Plan

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21s

Lost Horse Planning Unit - Ryan Campground/Ryan Ranch: (p. 104) Social trails have proliferated between the campground, Headstone Rock outcrop, and the ranch site. The plan should specifically address how this situation should be corrected (through better formal trails?). Ryan Ranch itself is virtually ignored by the plan. The ruins of the ranch, its role in the development of the Lost Horse Mine, the pioneer cemetery at its entrance, and adjacent Indian bedrock mortars and petroglyphs, create an excellent situation for an interpretive trail. Stabilization of the old adobe walls at the ranch, or at least application of chemicals to retard the process, should be given high priority in order to maintain the option of their use in an interpretive program. The modern junk on the site (e.g. NPS pump house structure) should be removed. The pipeline trail to Lost Horse mine should be officially adopted, maintained and signed.

21t

Covington Planning Unit - Black Rock: (pp. 30-31, 96) The proposal to develop a nature center at Black Rock is an excellent idea. The plan does not specify who will organize the proposed Colorado/Mojave desert biosphere reserve seminars (pp. 30-31), and is sparse in the operational details of the center. This appears again to represent an excellent area in which to expand the role of the cooperating association. The site map of Black Rock does not appear to provide adequate day-parking for the nature center, particularly parking and turnaround space for school buses. This facility, along with the proposed cultural center at Twentynine Palms, represents an outstanding opportunity to exercise the outreach program stated as one of the plan's major goals.

21u

21v

Pinto Basin Unit - Coxcomb Mountains: The plan does not address the possibility for primitive car-camping in the eastern part of the Monument. This has occurred on a sporadic basis at two locations on the northern end of the Coxcombs. There are a number of primitive routes running part way into the Coxcombs from the aqueduct road. Now that this area has been brought fully into the park, the plan should be amended to state that they will be closed and rehabilitated.

21w

Pinto Mts Planning Unit: (pp. 112-118) The Desert Queen Mine/Pine City parking area is not mentioned. This parking lot is small and often congested on busy weekends. Directional trail signs are needed, both at the trailhead and at critical junctions around the Desert Queen Mine. The average visitor arriving at the trailhead doesn't know which direction to set out for the mine site. Here is another opportunity for creating a good interpretive trail network, going first to the mine lookout site, and then to the mine via a stone building and the old mine road.

21x

Transition Planning Unit: (pp. 119-122) The plan does not adequately justify why the road should be relocated around the Cholla Garden. This area of dense cholla growth is quite extensive, particularly towards the north, and to avoid it altogether would require much more than a minor road realignment. The plan implies that the cholla plant community has been disturbed by visitation, but on-site visits over the years do not convince me of this. The road realignment seems an unnecessary

21s. The plan proposes that trails be redesigned to protect surrounding resources (including cultural resources) and that social trails be restored. A trails plan would address the specific siting of trails. The plan has been revised to preserve the adobe ranch walls.

21t. See response 21h.

21u. Parking in this area would be redesigned and would include space currently occupied by the old tennis courts.

21v. See response 21k.

21w. The plan addresses parking along the primary paved park roads in the most heavily used areas of the park. Trailhead parking areas along secondary dirt roads would be retained and redesigned — in this case to accommodate horse trailer parking. The plan proposes that trails be redesigned to protect surrounding resources and that social trails be restored. A trails plan would address the specific siting of trails. The plan has been revised to include the development of an interpretive trail for the Desert Queen Mine area.

21x. See response 6s.

expense that could be better used to acquire and rehabilitate some of the private inholdings and old roads in the nearby Turkey Flat region of Pinto Basin.

21y

Pinto Basin Unit - Wildlife: Due to proximity of Eagle Mountain Kaiser mine and its potential exploitation as a land-fill, the plan should stress the importance of establishing a good baseline on tortoise and bighorn sheep populations in order to assess the effects of any future development. Are current and planned surveys adequate?

Cottonwood Planning Unit: The plan for a boardwalk at Cottonwood Spring is positive and should lead to both improved interpretation and restoration of vegetation and wildlife at this resource.

Cottonwood Planning Unit - Wildlife Water sources: (pp. 130-135) For many years, Cottonwood Spring has been adversely impacted by constant foot-traffic, with has also affected its use by wildlife. The plan should stress the importance of this water source for wildlife, as well as address the possible development of nearby Wood Spring as a wildlife water source. This latter spring is hidden up a side canyon from Cottonwood Wash, but is badly overgrown and not really accessible to wildlife.

21z

Headquarters Planning Unit: (pp. 148-149) Should the city of Twentynine Palms pay for maintaining artificial irrigation of this Oasis of Mara, since lowering of the local water table may be due to pumping of nearby wells? Should artificial irrigation be employed at all? Would a more important lesson be taught by allowing the "natural" process of water diversion to the human population take place and letting the palms die? The important issue of water management at Mara should be addressed.

IN CLOSING: Thank you for this opportunity to comment on the proposed plans and actions. As a new National Park located so near a huge metropolitan area, Joshua Tree's natural resources will come under ever-increasing pressure. I urge that Park Service to keep resource protection firmly in the forefront of management decisions. Please continue to keep me informed of park planning issues.

Thanking you sincerely,



cc: Ernie Quintana
Phil Lundgren

21y. See response 6t.

21z. See response 4c.

COMMENTS

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113

November 3, 1993

Regional Director
Western Regional Office
National Park Service
600 Harrison Street, Suite 600
San Francisco, CA 94107-1372

Subject: Comments to Draft General Management Plan For Joshua Tree
National Monument [ParkII]

Dear Sir:

I have reviewed the subject document and I have the following comments, all of which apply to the Preferred Alternative unless stated otherwise:

1. I am opposed to paving the road to the Barker Dam area. Not only would this adversely impact desert tortoise habitat, this area is currently relatively peaceful and has an aura of remoteness; paving the road would degrade that atmosphere by significantly increasing traffic in the area.
2. I am opposed to the paving of a large parking lot in the Echo Rock area, for many of the same reasons mentioned above.
3. I am opposed to the creation and paving of a new large parking lot in the Barker Dam area, especially since it will be in a previously undisturbed area. Again, this would impact desert tortoise habitat and destroy the remote ambiance of the area.
4. In general I would prefer that the paving of existing dirt roads be minimized. This would result in less damage to the environment (both during construction and over the long term), less traffic in these areas and a more enjoyable experience for those of us who appreciate getting away from most of the other visitors. Having a dirt road instead of a paved road would not prevent anyone who is truly interested from visiting a particular area (within reason, of course, since some roads are suitable only for 4-wheel drive vehicles). To me the paving of existing dirt roads is in direct conflict with the statement on page 19: "All development and facilities would blend harmoniously with the

22a. See response 6r.

22a

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[REDACTED]

environment...."

I am also opposed to the paving of campground roads, campsite parking and day use parking areas. I prefer to leave these areas more or less as they are with respect to paving. Better delineation with rock barriers or vegetation would be welcome.

I agree with and approve of the plan to widen and improve all of the existing paved roads in the Monument.

22b

5. The area of new disturbance as a result of the proposed paving of the road from Intersection Rock to the Barker Dam area is not clear. How many acres will be disturbed by this road? The table on pages 175-176 (Preferred Alternative) indicate 92.7 acres of new disturbance (Monumentwide) due to road reconstruction. In the paragraph on page 176 describing Alternative B - No Action, it is stated that "reconstruction would affect approximately 93 acres....". Thus, the same acreage is reported for both the Preferred Alternative and the No Action Alternative even though the latter does not involve paving the road from Intersection Rock to the Barker Dam area. Somehow, this does not add up right.

22c

6. It appears that there are not enough parking areas and pullouts in the Hemingway and Lost Horse Valley areas. I have observed that these areas are very popular with rock climbers and often attract significant numbers of climbers. If sufficient parking is not provided near these climbing areas, then climbers will park in (and possibly fill) other lots which are actually less convenient for the climbers but most convenient for non-climbers who wish to visit nearby attractions such as the Hidden Valley Nature Walk. Rather than having climbers fill up lots near the Hidden Valley trailhead, a better solution seems to be to provide more parking areas near the climbing areas (that would not likely be used much by non-climbers). This solution would also be in line with the desire to mitigate user conflicts.

22d

7. Page 39 states "All unneeded or undesirable parking areas (primarily turnouts) would be obliterated and access blocked." Obviously, these parking areas and turnouts were needed and desired by someone, otherwise they would not have been created in the first place. My question is: Who decides which ones are "unneeded or undesirable" and which ones are retained? Will there be an opportunity for public input on this issue?

22b. The no action alternative assumes a continuation of the phased road reconstruction project, including realignment of Barker Dam road near intersection Rock. Barker Dam Road would not be widened under any alternative. The park service would be preparing additional NEPA compliance documents, most likely environmental assessments, for all future road reconstruction projects as they are funded and designed. At that time the park service would have adequate details for the proposals and to further evaluate impacts as well as alternative evaluation as required by NEPA.

22c. See response 8c.

22d. Many of the proposed lots would consolidate the use from a number of existing smaller parking areas (primarily turnouts) or where pulloffs have developed along the roads when existing lots were full. The old turnouts and pulloffs would then be obliterated and revegetated. The plan discusses the approximate location and size of the proposed parking areas for the heavy use areas of the park and that additional pulloffs would be placed approximately every .25 mile along Park Boulevard. As previously stated, additional, more detailed environmental compliance documents would be prepared for future road reconstruction projects which includes the design of the parking areas.

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8. The maps which depict Parking/Pullouts are drawn at a scale which makes it difficult to determine precisely where parking areas and pullouts are located.

9. The redesign of several campgrounds is not discussed in sufficient detail. More detailed maps or descriptions are necessary to indicate exactly where campsites will be created and destroyed. Without this detail, it is difficult for the public to assess the desirability of the proposed changes.

Pages 33-34 contain a statement, "Separate camping loops for user groups such as tent campers, horse users, ... would be provided" yet no details are given as to where and how many of each of these types of camp sites there would be. I am concerned that the number of sites intended for tent users may be reduced.

I feel that the number of camp sites in Hidden Valley and Ryan should be increased, perhaps by as much as 20% and 50%, respectively. There is certainly sufficient demand during the high season to fill these additional sites and the environmental impact would not be significant compared to some of the other proposed developments in the Preferred Alternative.

In more than 10 years of visiting and camping in Indian Cove, Hidden Valley, Ryan and Jumbo Rocks, I have observed exactly one overnight camping party who appeared to have arrived solely via horse; I am opposed to the allocation of more than a bare minimum of camp sites for the exclusive use of horse users (only 1 or 2 sites, maximum, per campground).

10. The procedure that is proposed for campsite registration/reservation is not at all clear. I would favor some type of system in which it is possible to reserve a site at any of the campgrounds, while simultaneously maintaining a significant number of first come, first serve sites at all of the campgrounds.

I believe that currently it is possible to reserve only Group sites (Monumentwide) and sites at Black Rock Canyon campground. The ability to make reservations is essential for those willing to make plans well in advance and be assured of a campsite upon arrival.

Although some type of reservation system is desirable in my view, I also feel very strongly that a significant number of first come, first serve sites be set aside for all campgrounds. I would suggest that the number of first come, first serve campsites range from a minimum of 50% of the sites to as much

22e. See responses 11i.

22f. See response 8a.

22e

22f

[REDACTED]

as 75% of the sites at any particular campground. I would be opposed to a situation where, at a particular campground, all of the sites are by reservation only or all of the sites are first come, first serve. All campgrounds should have a mixture of reservation and first come, first serve sites.

Regarding the reservation system, I would prefer that it be either (A) administered by National Park Service personnel, or (B) administered by a private firm that does not charge a premium above the actual site fee. I strongly object to being forced (i.e., no alternative) to obtain my reservation from a private firm that not only collects the site fee but also an additional fee for their service. Why should a citizen and taxpayer be required to pay a fee to a private (profit-oriented) organization for the privilege of camping on public land (i.e., my land)? I have found Mistix to be particularly annoying and inconvenient in this regard. I would rather pay a higher fee directly to the NPS (to provide additional personnel) than to be forced to deal with a private firm to obtain my reservation.

11. In the large scheme of things, this is a relatively minor point but I object to "costumed interpretation" for Keys Ranch suggested on page 30. I feel that this is a practice which is disrespectful to the Keys' memory, smacks of commercialization and is just plain tacky.

Thanks for considering my comments and allowing me to participate in the planning process. And congratulations on becoming a National Park!

Sincerely,

[REDACTED]

cc: Mr. Ernest Quintana, Superintendent
Joshua Tree National Park
74485 National Monument Dr
29 Palms, CA 92277

COMMENTS

RESPONSES

D/J



SUBJECT: Draft General Management Plan - Joshua Tree NM

October 12, 1994
Regional Director, Western Regional Office
National Park Service
600 Harrison Street, Suite 600
San Francisco, CA 94107-1372

Dear Sir or Madam;

Thanks for sending me a copy of the Draft. I am deeply concerned that this Draft is not a suitable document for policy and planning purposes.

23a

There are numerous errors and inconsistencies in the "hard data" presented in the document. As a simple example, the counts of visitation presented on pages 167-8 are inconsistent—the visitation for 1992 is reported as 1.3 million in the figure at the top of page 167 and as more than 16 (sixteen) million in the figure at the top of page 168. Even after repositioning the decimal point in the latter figure, the results cannot be reconciled. The statement that annual visitation first surpassed the one million mark in 1990 also contradicts the figure on page 168 (even allowing for the misplaced decimal point).

There are numerous other difficulties in the presentation (or lack thereof) of supporting data and the methods used to gather and summarize the data, which ironing out these inconsistencies would not fix.

23b

I was startled and disappointed to see that a reservation system is being proposed for all campgrounds (page 34). My experience camping in JTNM suggests that this would be a harmful change. I know that 'group' campsites must be reserved weeks in advance and that it is hard to get a reservation even if one calls a few hours after the sites are up for reservation. In spite of this, I have noticed that it is rare for all of the 'group' sites to actually be occupied. I have also seen campsites in busy campgrounds abandoned early on a Saturday (e.g. to take a sick child home) that could not have been put to use had a reservation system been in effect.

23c

The suggestion on page 187 that the ban on the placement of fixed anchors for climbing "would not preclude use of any climbing routes, as all routes can be climbed with alternative methods" is frightening. The "alternative methods" that come to mind are climbing without a rope and climbing on a rope that is sent down from the top. Each of these "alternative methods" has its dangers. Climbing without a rope has obvious dangers. As for

23a. The visitation figures have been corrected.

23b. See response 8a.

23c. See response 11a and 20n.

Page 2: JTNM Draft Management Plan

top-roping, some rocks cannot be safely climbed without ropes and fixed anchors (as would be needed to establish the top-rope) while others follow a tortuous course making serious falls a possibility even on a top-rope. While I appreciate that another document will deal with climbing management in detail, I worry that the misinformed, off-hand opinion I see here will be carried into that document.

My wife and I have long enjoyed visiting places of natural beauty—including National Parks—and I appreciate that resource management is necessary and desirable in popular areas. However, I am deeply concerned that the Draft General Management Plan does not provide a suitable basis for planning.

Sincerely,



