

Analysis of Public Scoping Comments for GMP

Joshua Tree National Park

November 30, 2010

After sending out a GMP scoping newsletter and holding public meetings in five communities around the park perimeter (Palm Springs, Palm Desert, Twentynine Palms, Yucca Valley and Joshua Tree) in May 2010, National Park Service staff requested public scoping comments from May through August of 2010. Written comments were received via the following media during this scoping period:

- 32 comments submitted via PEPC
- 25 comment forms from scoping newsletter
- 15 hardcopy and emailed letters
- 5 comment letters submitted via email to park staff
- 1,947 comment letters from the National Parks Conservation Association (NPCA)
 - +/- 1,500 of these letters were an NPCA form letter signed by NPCA members
 - +/- 450 of these letters were altered/customized by NPCA members
- Large volume of comments received at the five public meetings held in late May 2010

During the five public meetings, additional comments were provided to NPS staff by meeting attendees. These comments have also been captured in this analysis. In the public meetings, NPS staff also fielded many questions about GMP/NEPA processes, park issues, and past park management decisions. Meeting attendees were made aware of the public scoping period and were provided the necessary information/media to submit comments at a later date (via comment forms in the scoping newsletter, PEPC website information, etc.). A large number of the individuals who attended the public meetings also submitted written comments in one or more of the above media.

To help prompt public comments, the newsletter comment card and online PEPC public comment page asked interested parties to respond to the following four questions:

- 1) *What do you value most about Joshua Tree National Park?*
- 2) *What do you think are the most important issues facing the park that should be addressed in the general management plan?*
- 3) *Imagine you are visiting Joshua Tree National Park 20 years from now. Describe what you would like to experience?*
- 4) *Do you feel that the purpose and significance statements capture the essence of Joshua Tree National Park?*

Several respondents answered these questions, directly, individually, and sequentially. Whereas, many others indirectly answered these questions in their own way through a narrative reply. Also, numerous respondents addressed questions #2 and #3 jointly, by concurrently identifying current park challenges and suggesting future opportunities and solutions. Attendees of the public meetings raised their thoughts and concerns verbally to NPS staff or in writing on a park map which was provided. The following narratives summarize the overall public comments that were raised during the initial GMP public scoping period (submittals, meetings, etc.). Given the disproportionately large volume of comment letters that were submitted by NPCA members (1,947), the substance of these letters will be addressed separately.

What do you value most about Joshua Tree National Park (JTNP)?

When describing why they visit or value JTNP, a large majority of respondent comments identified the park's passive visitor experience values that relate to the opportunity to escape urban living and view a beautiful desert landscape and experience quiet desert solitude. These comments included:

- scenic views and unique landscape beauty
- desert solitude, serenity, and stillness
- vast amounts of "untouched" land and open space expanses without roads/trails (for exploring on foot)
- generally lacking of evidence of human activity
- wilderness/backcountry experiences and feeling
- dark night skies and astronomy/stargazing
- clean air (visual/experiential value)

The next largest grouping of comments represented individuals who value JTNP for its diverse and unique natural and cultural resource values. The individuals that identified these values generally expressed an interest in both the passive recreation of observing these resources (e.g., wildlife viewing) and also the ecological and cultural value of preserving these resources or just knowing they exist and are protected. These respondents recognized values such as:

- wildlife
- wild nature
- native vegetation and wildflowers
- cultural history
- diversity of plant and animal species
- rock formations and geological wonders (viewing)
- Joshua trees
- two different deserts in one location and intact Mojave and Sonoran deserts
- clean air (ecological and physiological value)
- mining history

The last general grouping of park values raised by respondents relate to the more active recreational and educational values of the park. The individuals that consider recreational values to be most important commented on specific recreational uses and specific recreational sites in the park. These respondents recognized the values such as:

- rock climbing opportunities
- hiking opportunities, good trail system, and cross-country hiking through desert
- biking opportunities
- camping opportunities
- diverse opportunities for reasonable, low-impact use
- picnic opportunities (e.g., Hidden Valley area)
- ranger education programs
- many self-discovery nature education opportunities that the park and its resources provide
- various developed recreation sites
- Black Rock Canyon
- unique place for special experiences (e.g., getting married)

Other miscellaneous comments on why people value JTNP included items such as:

- park's proximity to place of residence
- park's proximity to a large urban center (L.A.), yet far enough away to feel wild and remote
- Camaraderie with other local people, and the emotional connection with the desert and park
- Clean grounds (no trash), and developments that blend with landscape
- Park's management team and park staff are attentive and responsive land stewards, and engage with the local communities

What are the most important issues facing JTNP that should be addressed in the GMP?

-AND-

Imagine you are visiting JTNP 20 years from now. Describe what you would like to experience?

Respondents raised several notable concerns and challenges facing the park, as well as many good suggestions on how they would prefer to see these challenges addressed in the future. A fair number of people indicated that they are very happy with the way the park is currently managed, and suggested that the future management of JTNP should reflect the current management of the park. However, the balance of the comments included recommendations for future management that would either promote increased levels of resource protection/preservation or provide increased levels of active recreation opportunities (i.e., relative to current levels). In a few cases, both were suggested.

Resource Preservation and Desert Experience Comments

The largest number and greatest breadth of public comments referenced concerns about degradation of natural/cultural resources and degradation of visitor experiences in the park as a result of active recreation stresses and visitation demands. In most cases, these concerns were followed with recommendations to better control existing recreation/use impacts or to reduce the recreation and development footprints in the park. A large number of people considered the preservation of the natural and quiet desert landscape, ecosystem (native wildlife, plants, hydrology, etc.), and cultural resources as a park priority, and recommended maintaining large expanses of undeveloped, wilderness areas without structures, roads, trails, or utilities. Suggestions for how the NPS should accomplish this included:

- “intensely manage” climbing to prevent resource damage
- restore areas degraded by climbing
- close climbing areas if wildlife is being harassed or cultural sites are being harmed
- close all the Indian Wave boulders to climbing and bouldering
- discourage or ban bicycles due to erosion and vegetation damage caused by off-road biking
- improve trail signage to better contain hikers, bikers, climbers, and equestrians to reduce vegetation trampling
- conduct long range studies to assess recreation impacts on flora and fauna, and carrying capacity of park natural resources and visitor experience values
- increase surveying of archaeological artifacts, and increase protection of prehistoric and historic sites and artifacts
- use local residents to assist in cultural resource site protection and monitoring
- remove non-historically significant buildings and facilities
- limit or prohibit concessions within park boundaries
- keep cell phone accessibility limited in the park
- increase use of renewable energy
- limit facility development to maintain natural, wild landscapes
- maintain large amount of park as wilderness, but still keep it accessible to visitors
- allow only primitive camping
- limit or reduce campgrounds in the park, with possible new campgrounds located outside the park
- more enforcement of “quiet time” and behavior in campgrounds, and separate climbing campers or tent campers from RV campers
- change Hidden Valley Campground to a hike-in campground, and limit to individuals or small groups
- restrict, limit, or better manage large group camping and visits to reduce resource impacts and noise
- eliminate camp fires to prevent wood gathering and partying
- limit equestrian use to designated equestrian trails to reduce resource impacts
- maintain and enforce restrictions on ORV use in the park
- restrict dogs from park, or limit to trails only

Another related grouping of comments raised similar concerns with park values being degraded by visitation pressures and/or traffic, but focused on the impacts of road development. Individuals who made these comments offered various suggestions for the future management of the transportation system as a way to help minimize or control these threats. A large number of these comments recommended a transit system using alternative- or clean-energy vehicles. These comments included:

- Provide network of quiet, clean-energy transit vehicles on park roads to reduce/eliminate impacts from cars and RVs (e.g., buses, open-air trams)
- Set limit to vehicle volume into the park to reduce air quality and noise impacts
- Encourage visitors to bike or hike instead (provide better bike lanes or free entrance to promote this)
- Set higher fees for RVs and large vehicles to dissuade use or offset their higher impacts
- Limit or restrict diesel engines such as trucks and RVs due to noise and air quality impacts
- no new roads or upgrades of existing roads
- road improvements (curbs, gutters, sidewalks) have encouraged higher travel speeds which degrades wild feel of the park
- improved management and enforcement of pullouts
- close roads that are causing resource damage, and even close to biking and equestrian
- convert some closed roads to hiking, biking, or equestrian trails

Several respondents also raised concerns about external threats to park resources and experience values, and suggested that the NPS be proactive to address these issues as much as possible. Common external threats mentioned were urban encroachment, inholding development, air quality and night sky degradation, climate change, and noise. Some of these comments and suggestions included:

- Acquire more land around perimeter to buffer and protect park resources and boundaries
- Work with local/regional communities and land protection organizations to maintain open space linkages to/from neighboring public lands to preserve wildlife movement and allow for plant community migration which would result from climate change (e.g., connections to Sand to Snow N.M.)
- Bring BLM “Saddle”, Eagle Mountain Mine, and other large adjacent tracts into park (and clean up)
- Acquire private inholdings in park
- Encourage low-density development along boundaries to allow for wildlife movement
- Encourage local communities to grow responsibly, limit water resource demands, and control light pollution
- Work with local and regional communities on climate change issues and air quality protection
- Use the park for climate change modeling studies and other related research
- Address airplane overflight noise problem and its affect on wilderness experience

Active Recreation Opportunities Comments

Another large grouping of public comments focused on recommendations for maintaining or increasing active recreation opportunities in the park. Although this overall grouping of comments was less in number than those that relate to protecting park resources and natural desert experience values, a notable volume and diversity of comments were provided by respondents. Some of these individuals expressed concerns that the NPS would reduce such opportunities in the future, and commented accordingly. Others considered current recreation opportunities insufficient or thought they could be improved, and made suggestions for enhancements or expansions. Comments about concerns with existing management and suggestions for future recreation management included:

Climbing

- given the park’s iconic climbing status, maintaining it as a climbing destination should be the most important management issue
- provide specific recognition and management of highlining and slacklining opportunities in the park
- climbing and slacklining are the “heart” of the park and generate most visitation, so park should be managed accordingly, with less tourists and more opportunities for climbers
- require safety course (or similar) for climbers (rock climbing accidents are a problem)
- mark climbing trails and harden staging areas to prevent more damage
- increase number of climbing areas that cannot be guided on weekends and holidays

Camping

- provide a bike-in campground
- provide a hike-in campground
- add more campgrounds in the park interior, but without overdeveloping or causing overcrowding
- add new campgrounds on the periphery of the park, such as in the flats in the southern part of the park
- allow backcountry camping at base of some climbing areas

Trails

- provide dedicated, paved bike-only trails that are separated from roads (e.g., one-way loop or point-to-point trails)
- provide dedicated, single-track mountain bike trails that are separated from roads
- widen paved roads for cyclists and/or bike lanes

- allow biking on some current hiking and equestrian trails
- separate biking and hiking trails from equestrians and autos to reduce user conflicts
- Wilderness Act does not ban mountain biking, it is “substantially unnoticeable” per the Wilderness Act and is human-powered transportation
- maintain the current hiking trail system (it’s good)
- expand trail system
- add Pinto Mountain trail from Twentynine Palms to Morongo Valley
- establish distinct and better-signed trails so hikers aren’t walking “all over the desert” because they don’t know where the trails are
- pave more trails

Other Allowable Uses

- maintain or increase equestrian opportunities
- create a dog park in the park
- allow dogs on trails (on-leash and with proper waste management)
- provide access to features without too many areas being “roped off” for safety or resource protection, as this detracts from natural value
- expand visitor opportunities so visitors want to stay overnight in nearby towns
- increase opportunities to get people out of their cars
- provide concert at Piano Rock, like in the old days
- accommodate recreation needs for a changing demographics of visitors
- emphasize diversity of recreational uses at park, not just climbing

Park Facilities, Operations, and Programs Comments

The last grouping of public comments referenced other issues that relate to the park's facilities, NPS operations, and programs offered to visitors. Several of these comments indicated concerns with increased visitation pressure on these issues. Thus, many of the GMP suggestions targeted ways to improve park quality while anticipating future visitation demands. Comments on these matters included:

Facilities

- build visitor center inside the park, which would provide a better opportunity to educate visitors
- add picnic tables and benches at Barker Dam area
- regrade, repave, and improve maintenance of main road from JT to Cottonwood (Pinto Basin Rd.)
- widen main road pavement for cars to pass with ease
- add bicycle racks at park recreation areas
- provide drinking water at recreation sites
- expand parking areas (number or sizes)
- increase cell phone coverage, add emergency phones
- use composting toilets
- increase recycling and composting opportunities
- designate and manage Twentynine Palms Visitor Center as the main entrance to the park
- provide "fast lane" for season/annual pass holders at park entrance gates (to avoid long queues)
- convert Oasis Visitor Center to a cultural museum and visitor center
- improve entrance facilities at Black Rock to deter partying and improve image
- add shade structures to trailheads

Education Programs/Facilities

- add easy-walking nature/education trails and gardens
- add a "museum of the desert" (e.g., desert history, culture, arch., nature), and display stored collections
- increased interpretive displays and programs
- increase education opportunities for children
- provide gardening workshops
- add more educational programs at Black Rock
- encourage local kids to be interested and educated about the park so they can become future stewards
- provide overnight facility in park for Desert Institute so people could stay in park for the entire program
- provide more information on biology, geology, and history at visitor centers and bookstores
- increase organized tours to remote areas of the park

- improve visitor education to help prevent user impacts
- add interactive children's museum in a visitor center
- provide self-guided pamphlets (free or nominal fee), for hiking and roadway visitors
- provide park-related movies (history, desert ecology, etc.) on the huge rectangular rock at Ryan Ranch campsite (a natural movie screen) or movies in mini-theaters in the visitor centers
- provide more self-directed walks

Other Operations, Enforcement, and Admission Issues

- improve campsite registration system (too difficult to get campsite, need to plan months in advance)
- limit the time prime campsites are occupied by any one group; have long-term campers use remote sites
- create overflow primitive tent camping at the Boy Scout trailhead and close area to the west to hike-in camping only to reduce degradation
- improve trash pick-up and monitoring
- clean graffiti faster
- add/improve bird poop clean-up at waysides
- improve visitor education about pets and improve enforcement of pet policies
- improve enforcement along roads and safer turnouts needed (e.g., people stop in the middle of the road and leave their cars idling)
- improve enforcement of all ORV incursions
- improve enforcement of disturbances at Black Rock
- improve enforcement of littering and illegal dumping
- improve enforcement of poaching
- improve enforcement of speeding on main park road
- partner with park neighbors/partners to establish a "neighborhood watch" program for the park to help reduce illegal ORV use, dumping, poaching, etc.
- provide military discounts, "military family days", and/or quarterly tours for military families
- provide stronger NPS search and rescue (i.e., "take more responsibility rather than relying on volunteers")

Do you feel that the purpose and significance statements capture the essence of JTNP?

Most of the public comments that addressed this question expressed support of the preliminary park purpose and significance statements included in the public scoping newsletter and displayed at the public meetings (calling them "good" or "sufficient"). A small number of respondents were somewhat confused by what these are or apparently did not read the section in the newsletter that discussed park purpose and significance. The remaining comments generally expressed support, but recommended additional significance statements and/or topics to be added to the park purpose statement. The comments about suggested additions or strengthened emphasis to park purpose and significance included:

- Threatened and endangered species protection (e.g., desert tortoise)
- educating people on desert protection
- public land linkages (with adjacent public lands)
- fostering a local culture of desert lovers, artists, and conservationists, and encouraging and expanding this culture to the Coachella Valley communities
- the increasingly rare “spacious sense of solitude”
- unique opportunities for individuals/families to experience naturalness, scenic beauty, history, and geological wonders
- recognizing the preservation/protection of wildlife in the park purpose
- recognizing the richness and value of wildlife in the park in the significance statements
- being more specific and clear about the recreational reasons why people visit the park, because the use of “recreational opportunities” phrase is too general and too minimal
- adding separate significance statements and park purpose reference to aesthetic value and rock climbing
- 20 year horizon for the plan is too short, longer-term stewardship planning is necessary
- value to the small community of slackliners and climbers
- “purpose and significance statements lists ecological buzzwords and screams ‘stay in your car, get out at designated stops, drive through the park, and leave’. The statement doesn’t scream, ‘come enjoy the beauty of JOTR for outdoor trail recreation using our various trail networks to do this for days or weeks.’”

NPCA Letters

The NPCA submitted a total of 1,947 comment letters from NPCA members. About 1,500 of these letters were the NPCA form letter with individualized greetings and/or signatures. This form letter submittal focused on the following three points:

Values of park:

outstanding rock climbing, hiking, camping, and stargazing opportunities

Challenges:

JTNP is a refuge for many desert plants and animals and also a haven for recreational users. The GMP should continue to provide for outstanding recreational opportunities while at the same time protect natural resources, archaeological sites, and historic resources.

Needs:

- comprehensive study on how different forms of recreation (incl. hiking, camping, equestrian use, and rock climbing) are impacting the natural and cultural resources of the park
- restoration plan for heavily-used climbing and bouldering routes
- expanded NPS efforts to educate the public and also explain how climate change will affect the park's resources

Approximately 450 of the 1,947 NPCA submittals were form letters that were altered and customized by individual NPCA members. Roughly 225 of these 450 NPCA members removed multiple sections from the form letter and replaced them with different values, concerns, or ideas. About two-thirds of these 225 NPCA members removed all references to active recreation from the letter. Valuing the park for rock climbing was the most common item removed from the original NPCA form letter.

While removing active recreation references, many of these people strengthened references to natural resource protection and passive experiences in the park (e.g., desert solitude, scenery). Another 75 of the customized letters (in addition to the previously-mentioned 225) kept the form letter substance but included additions of values, concerns, or ideas. Of items that were added to NPCA letters, the most common comments referenced the natural wonder of the park (e.g., “gem”, “treasure”), its uniqueness (“rarity”, “disappearing landscapes”), its biodiversity (both flora and fauna), and the general environmental ethic of preserving natural resources. Additional recreation references in these letters focused only on passive experiences such as birding, photography, wildlife and wildflower viewing, and experiencing the desert solitude (e.g., awe, serenity, spiritual pursuits).

The remaining 150 or so of these 450 edited letters were essentially the same as the form letter in substance, with only minor cosmetic changes.