GENERAL MANAGEMENT PLAN AMENDMENT
SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

BACKCOUNTRY AND WILDERNESS MANAGEMENT PLAN

JOSHUA TREE NATIONAL PARK
Riverside and San Bernardino Counties, California

On October 31, 1994, Public Law 103-433 added 234,000 acres to Joshua Tree National Monument and changed its status from national monument to national park. The land that was added by the legislation comprises primarily backcountry and wilderness areas. In 1995, the National Park Service adopted a general management plan to administer the developed zone of the former national monument. This amendment to the *General Management Plan* accomplishes two objectives deferred by that plan: management of the natural zone on former national monument land and management of all the land added to the park in 1994.

In November 1997, the National Park Service released a draft amendment to Joshua Tree National Park's *General Management Plan* to serve as the *Backcountry and Wilderness Management Plan* for the park. This draft amendment offered a proposed action and three alternatives for management of Joshua Tree National Park's backcountry and wilderness. The proposed action (alternative A) would minimize disturbance to resources, ensure their preservation, and offer the public a wide variety of recreational opportunities. Alternative B (no action) would continue the status quo. Alternative C (maximum protection) would rigorously protect resources and restrict visitor use of the backcountry. Alternative D (minimum requirements) would impose no new restrictions; the land added in 1994 would be managed for its historic use with only illegal activities prohibited. The affected environment was described, and the impacts of the four alternatives were evaluated for impacts to natural resources, cultural resources, and visitor enjoyment.

After a lengthy public review and comment process, thorough review of comments, and consideration of the Joshua Tree National Park Advisory Commission's input, the National Park Service determined that changes to the proposed action warranted issuing a supplement to the draft amendment. The new document supplemented the original and updated the planning process; discussed the new proposed action (alternative E) and the environmental consequences of implementing the new alternative; and contained summary tables that compared the actions and consequences of the five alternatives.

All five alternatives address issues of public concern. Management prescriptions for the protection and use of backcountry and wilderness areas, trails, roads, climbing, camping, closures, group size limits, artificial water sources, and desert tortoise protection are described for each alternative.

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SUMMARY

The act of November 10, 1978, (PL 95-625) codified at 16 United States Code (USC) 1a-7(b) requires that the National Park Service prepare a general management plan to provide for the preservation and public enjoyment of each area of the national park system. In 1995, the National Park Service adopted a new general management plan for the administration of Joshua Tree National Monument. On October 31, 1994, the California Desert Protection Act redesignated Joshua Tree National Monument as a national park and added approximately 234,000 acres of Federal and nonFederal land to the area.

The 1995 *General Management Plan* prescribed management zoning of the national monument, but did not specify prescriptions for managing the natural zone in the monument or the 234,000 acres that were added in 1994. Instead, the *General Management Plan* stated that the National Park Service would develop a wilderness and backcountry management plan for the natural zone of the monument that would also address the new areas of the park.

This *General Management Plan* amendment, the *Backcountry and Wilderness Management Plan*, accomplishes the two objectives deferred by the 1995 *General Management Plan*:

- management of the natural zone in the former national monument
- management of all the land added to the park in 1994

The National Park Service, in fulfillment of requirements of the National Environmental Policy Act (NEPA) and its regulations at 40 Code of Federal Regulations (CFR) 1503.1, released a draft *General Management Plan Amendment* and *Supplemental Environmental Impact Statement* (EIS) for public review and comment in November 1997. After the lengthy public review and comment process, thorough review of the comments and consideration of the Joshua Tree National Park Advisory Commission's input, the National Park Service determined that changes to the draft proposed action warranted issuing a supplement to the draft *General Management Plan Amendment*. The Supplement to the draft *General Management Plan Amendment* contained the National Park Service's new proposed action (alternative E) and was released for public review and comment in November 1998.

Management of all the land added in 1994 and of the land in the natural zone of the national monument would be enhanced by the adoption of the new proposed action (alternative E). This *Backcountry and Wilderness Management Plan* would protect natural and cultural resources by permitting visitor enjoyment in ways that would reduce impairment of cultural resources, vegetation, soils, geologic resources, and wildlife. The new proposed action would enhance visitor enjoyment by ensuring a wide range of visitor experiences from 4-wheel drive vehicle touring on rough unpaved roads to hiking in some of the most primitive wilderness in Southern California.

This *Backcountry and Wilderness Management Plan* presents the five alternatives that were considered for the management of nine significant actions that affect the quality of the human environment. Those actions (not in order of significance) include:

1. designation of a trail system with prescriptions for certain uses: foot, bicycle, equestrian;
2. designation of unpaved roads in lands added to the park in 1994 as part of the developed zone and thus open to motor vehicle use;

3. designation of management prescriptions for recreational climbing throughout the park;
4. designation of locations in the park where roadside auto camping may or may not be permitted;
5. analysis of major artificial water sources installed for wildlife in designated wilderness and if such sources should be removed or maintained;
6. adoption of areas limited to day use only or closed to public access seasonally or permanently;
7. establishment of group size limits for overnight stays in the backcountry and wilderness;
8. implementation of the Department of the Interior's *Desert Tortoise Recovery Plan;* and
9. analysis of proposed additions to wilderness.

TRAILS

New Proposed Action (alternative E)

The National Park Service would designate a trail system. Bicycle use would be allowed on certain designated trails in nonwilderness, and horse use would be limited to designated trails and corridors. Foot use would be permitted on all designated trails, in all designated corridors, and cross-country. An option exists, at the discretion of the Superintendent, to study the use of llamas in the park with the protection of resources and consistency with the National Park Service mission being the primary concerns. Access to remote backcountry and wilderness areas, where parking at a backcountry self-registration board is not practical or required, would include Pinto Basin and the Coxcomb, Pinto, Eagle, Little San Bernardino, and Cottonwood mountains. A reroute of .67 miles would move the .5-mile section of the Berdoo/Thermal Canyon bicycle trail that currently lies in wilderness to the backcountry transition subzone.

Trails not designated as part of the trail system would be restored to a natural condition. No new trail requests from the public would be considered until the designated trails are inventoried, developed, and monitored for several years.

Proposed Action (alternative A)

The National Park Service would designate a trail system. Bicycle use would be allowed on certain designated trails in nonwilderness, and horse use would be limited to designated trails and corridors. Foot use would be permitted on all designated trails and in all designated corridors, as well as cross-country.

No Action (alternative B)

A series of undesignated trails, some constructed but most established by hikers and horses, would continue to be used. The National Park Service would not maintain the trails, designate access points, or erect signs. All undesignated trails and routes would continue to be open. No trails are currently open to bicyclists, and none would be added.

Maximum Protection (alternative C)

All but a few trails would be closed. Open trails would be maintained, access points would be designated, and signs would be posted. Only designated trails would be open for hikers and equestrians. No trails would be open to bicyclists.

Minimum Protection (alternative D)

A series of undesignated trails, some constructed but most established by hikers and horses, would remain open. The trails would not be maintained, and access points would not be designated, but all trails would be open to all uses. Bicyclists could use all trails in nonwilderness.

ROAD SYSTEM

New Proposed Action (alternative E) – The Plan

The new proposed action would designate a total of 37.7 miles of Berdoo Canyon Road, Pinkham Canyon Road, Snow Cloud Mine Spur, Thermal Canyon Road, a connecting link from Pinkham Canyon Road to Thermal Canyon Road, Black Eagle Mine Road, Grubstake Canyon Road, Powerline Roads (east and west), west Eagle Mountain aqueduct access road as part of the developed zone and open to public motor vehicle use. All other roads and dirt tracks not designated as open would be closed to vehicle access and would be reclaimed as part of the natural zone.

This plan does not address roads, tracks, and jeep trails in designated wilderness or potential wilderness. Such roads or tracks are automatically closed to vehicle use by the Wilderness Act (16 USC 1131 *et seq.*).

A short section of monument road that was not mentioned in the *General Management Plan*, a 0.5-mile portion of the Gold Park Road, provides access to land administered by the Bureau of Land Management (BLM) in the Gold Park and Music Valley areas. The road has remained open to public motor vehicle use and would be designated as part of the developed zone and open to public use.

Holders of valid rights in the park might be able to operate motor vehicles on roads that are closed to the public, including roads in wilderness. Such users would first obtain National Park Service authorization as described in appendix 10 of the *Land Protection Plan* of November 1996.

Proposed Action (alternative A)

The proposed action would designate a total of 36.9 miles of Berdoo Canyon Road, Pinkham Canyon Road, Thermal Canyon Road, a connecting link from Pinkham Canyon Road to Thermal Canyon Road, Black Eagle Mine Road, Grubstake Canyon Road, Powerline Roads (east and west), west Eagle Mountain aqueduct access road as part of the developed zone and open to public motor vehicle use.

All other dirt tracks or roads in the nonwilderness additions to the park would be closed to public motor vehicle use. This plan does not address roads, tracks, and jeep trails in designated wilderness or potential wilderness. Such roads or tracks are automatically closed by the Wilderness Act (16 USC 1131 *et seq.*).

A short section of monument road that was not mentioned in the *General Management Plan*, a 0.5-mile portion of the Gold Park Road, provides access to land administered by the BLM in the Gold Park and Music Valley areas. The road has remained open to public motor vehicle use and would be designated as part of the developed zone and open to public use.

Holders of valid rights in the park might be able to operate motor vehicles on roads that are closed to the public, including roads in wilderness. Such users would first obtain National Park Service authorization as described in appendix 10 of the *Land Protection Plan* of November 1996.

No Action (alternative B)

Motor vehicles would continue to be allowed on all driveable roads in the nonwilderness additions to the park. On former national monument roads, vehicles would continue to be confined to designated roads. In addition to the roads in the proposed action alternative, the roads that would be open under this alternative would be: Fargo Canyon Road (2 miles), Rockhouse Canyon Road (7.4 miles), Snow Cloud Mine Spur (0.8 miles) from the Pinkham Canyon Road to the old Snow Cloud Mine area.

Maximum Protection (alternative C)

All roads in the nonwilderness additions to the park would be closed to motor vehicles. The roads could be designated for use by hikers or stock animals only. All roads listed as open in alternatives A and B would be closed.

Minimum Requirements (alternative D)

All roads in the nonwilderness additions to the park would be designated as open. In addition to the roads listed in the new proposed action alternative, the roads that would be open would include Fargo Canyon Road (2 miles) and Rockhouse Canyon Road (7.4 miles).

CLIMBING MANAGEMENT

New Proposed Action (alternative E)

A wide variety of climbing experiences would be maintained in the park through a comprehensive climbing management plan. A climbing committee would function as a subcommittee of the Joshua Tree National Park Advisory Commission and be chaired by a commissioner and be comprised of representatives of the climbing community, conservation organizations, and other individuals.

The National Park Service would formalize a process to inventory social trails, designate the minimum number of trails needed to access climbing areas, place physical barriers and signs to protect sensitive resources, etc. The National Park Service would survey the base of popular climbs to evaluate any restoration, protection, or additional management actions that may be needed. The National Park Service, with the Climbing Committee, would work with climbers to coordinate voluntary chalk clean-ups and to develop protocols for using chalk.

Replacement of unsafe existing fixed anchors would be allowed throughout the park. Replacement and new fixed anchors, hangers, and chains would be neutral or rock-colored. Replacement of existing fixed anchors would be accomplished in a manner that removes the old fixed anchor with minimum damage to the rock resource. Power drills could be used in the developed zone and the backcountry transition subzone with a permit.

Placement of fixed anchors in the developed zone and backcountry transition subzone would not require a permit, but a monitored process would be established to provide guidance and management oversight. The monitored process would be developed with the assistance of the Climbing Committee. A cap would be placed on the number of new climbing routes using fixed anchors (bolts).

A park-wide survey of existing routes with fixed anchors would assess impacts to resources and visitor experiences. Management prescriptions could consist of the relocation of specific fixed anchors and approach and descent routes, and/or permanent or temporary closures. Fixed anchors in wilderness found to impact resources or visitor wilderness experience would be camouflaged or removed.

Placement of any new fixed anchors in wilderness should require prior approval in the form of a permit by the Superintendent, and any climbing impacts in wilderness should not exceed 1998 levels. Fixed anchor free zones would be created in the park.

Proposed Action (alternative A)

A wide variety of climbing experiences would be maintained in the park. The National Park Service would issue permits for the installation of new climbing bolts. Bolts on routes in the climbing areas in the developed zone or the backcountry transition subzone, would be replaced on an as needed basis. Bolting would not be permitted in the wilderness subzone.

No Action (alternative B)

The status quo would be maintained using the *Climbing Management Plan,* which prohibits the installation of expansion bolts in rock faces in designated wilderness. The plan permits the installation of new bolts in the nonwilderness zones. Permits could be issued for the use of power drills to replace bolts in nonwilderness.

Maximum Protection (alternative C)

Fixed anchors would be confined to the developed zone. No new bolted routes would be established in the backcountry transition subzone or the wilderness subzone. Replacement bolts would not be permitted except in the developed zone. All bolts would be gradually removed from the natural zone. Unaided climbing via top-rope or free climbing would be permitted on any of the routes.

Climbing in the wilderness subzone would be by permit only. The number of permits would be limited to reduce impacts to natural and cultural resources caused by crowding and the concentration of climbing parties. Permits would be issued for specific geographic areas, and climbers would apply on a first-come, first-served basis for access to particular climbing areas. No permits would be issued for certain areas, such as the East Coxcomb Mountains.

Minimum Requirements (alternative D)

Climbing would be managed as one of the primary purposes of Joshua Tree National Park. Resource protection efforts that could interfere with climbing would be avoided. Installation of new bolts or the replacement of existing bolts would not be limited. Climbers could install bolted routes anywhere in the park without a permit. No area of the park, except those closed to the public, would be closed to climbing. Motorized drills would be permitted for the installation of bolts in nonwilderness areas.

AUTO CAMPING

New Proposed Action (alternative E)

The current policy on automobile camping would be applied to the land added to the park in 1994, and auto camping would be allowed only in designated campgrounds. Auto camping along roads would not be permitted anywhere in the park. The National Park Service would have the option to study the placement of a primitive auto camp in the backcountry transition subzone of the Little San Bernardino Mountains.

Proposed Action (alternative A)

The current policy on automobile camping would be applied to the land added to the park in 1994, and auto camping would be allowed only in designated campgrounds. Auto camping along roads outside of campgrounds would not be permitted anywhere in the park. No automobile campground facilities would be constructed on any of the added land.

No Action (alternative B)

All automobile camping would be confined to designated campgrounds.

Maximum Protection (alternative C)

All automobile camping would be confined to designated campgrounds. This applies to the land added to the park in 1994 as well as land in the former national monument.

Minimum Protection (alternative D)

Visitors could drive along any of the open roads in the park and pull off within 60 feet of the centerline (or 100 feet off centerline in nonwilderness) and set up camp for overnight stays. This practice would be permitted along any road in the developed zone. Such roads are found throughout Joshua Tree National Park.

CLOSURES

New Proposed Action (alternative E)

Some park areas would be closed to public use or limited to day-use only. These restrictions would be maintained on former monument land and additional areas would be designated on the new land. The purpose of the restrictions would be to ensure successful breeding of resident wildlife and to reduce stress to wildlife during summer heat and drought. Restrictions on overnight use would be continued in the backcountry transition and wilderness subzones for the following areas:

Cultural sites — Keys Ranch (640 acres), Lost Horse Mine (80 acres)

Water sources — Lost Palms and Munsen Canyons (3,840 acres), Buzzard Springs (2,640 acres), Rattlesnake Spring (2,640 acres), Smith Water Canyon (1,280 acres), Coxcomb Adit (2,640 acres), Stubbe Springs (5,120 acres)

Land areas — Wonderland of Rocks (30,053 acres), Pushawalla (7,680 acres)

The Keys Ranch site would be closed to the public except for guided tours.

Proposed Action (alternative A)

Some areas in the park would be closed to public use or limited to day use only. These restrictions would be maintained on former monument land and additional areas would be designated on the new land. The purpose of the restrictions would be to ensure successful breeding of resident wildlife and to reduce stress to wildlife during summer heat and drought.

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Land areas — Wonderland of Rocks (30,053 acres), Pushawalla (7,680 acres)

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Maximum Protection (alternative C)

Restriction on overnight use would be maintained in the backcountry transition and wilderness subzones for the following areas:·

Cultural sites — Keys Ranch (640 acres), Lost Horse Mine (80 acres)

Water Sources — Lost Palms and Munsen Canyons (3,840 acres), Buzzard Springs (2,640 acres), Rattlesnake Springs (2,640 acres), Smith Water Canyon (1,280 acres), Coxcomb Adit (2,640 acres), Stubbe Springs (5,120 acres)

Land Areas — Wonderland of Rocks (30,053 acres), Pushawalla (7,680 acres)

The Keys Ranch site would be closed to the public except for guided tours.

Special resource protection areas would be designated where there would be no public access during the summer. The closures would protect bighorn sheep water sources during critical drought months. The areas are: Lost Palms and Munsen Canyons, Buzzard Springs, Forty-nine Palms Canyon, Rattlesnake Springs, Smith Water Canyon, Pushawalla, Stubbe Springs, Coxcomb Adit, Russi's Rocks Guzzler, and Coxcomb Guzzlers. The acreage of these areas are the same as described for day use only areas. Russi's Rocks and Coxcomb Guzzler are 640 acres each.

Minimum Protection (alternative D)

All restrictions on overnight use in the backcountry transition and wilderness subzones would be removed. The Keys Ranch site would remain closed to the public except for guided tours.

GROUP SIZE

New Proposed Action (alternative E)

The intent of the group size limits would be to foster and protect different visitor experiences in the different subzones. The natural zone includes the natural environment subzone, now referred to as the backcountry transition subzone, and the wilderness subzone. The overnight group size limit would be 12 throughout the wilderness subzone and 25 in the backcountry transition subzone.

Proposed Action (alternative A)

Different group size limits would be established for overnight camping in the natural zone in the park. The natural zone includes the natural environment subzones, now referred to as backcountry transition subzone, and the wilderness subzone. The intent of the group size limits is to foster and protect different visitor experiences in the different subzones.

No Action (alternative B)

There would be no limits on the size of groups that use different zones for overnight camping. Overnight camping would be permitted anywhere in the backcountry transition and wilderness subzones that is open to public use, 1 mile from an open road and 500 feet from a designated trail or a natural water source. There would be no limits imposed on the number of parties permitted in each zone at any one time. No limits would be imposed on the size of day use groups.

Maximum Protection (alternative C)

Limits would be imposed on the size of groups that enter different zones for overnight camping. The group size limit in the backcountry transition subzone would be 15. In the experience class A wilderness, overnight group size would be limited to 8. Group size in experience class B wilderness would be limited to 6. Backcountry camping by overnight groups would be permitted only in specifically designated and hardened sites in the backcountry transition and wilderness subzones, which would be further subdivided: Limits would be imposed on the number of parties permitted in each subdivision at any one time to minimize contacts between groups. Day users would be subject to the same group size limits as overnight users.

Minimum Requirements (alternative D)

No limits would be imposed on the size of groups that enter different zones for overnight camping. Backcountry camping by overnight groups would be permitted anywhere in the backcountry transition and wilderness subzones that is otherwise open to public use and that is at least 1 mile from a road and 500 feet from a natural water source. No limits would be imposed on the number of parties camping in the backcountry at any one time or on the group size of day users.

ARTIFICIAL WATER SOURCES

New Proposed Action (alternative E)

The National Park Service would study four existing major artificial water sources for wildlife in the park. National Park Service biologists, in consultation with other Federal and state agencies, would determine the length of the study period and its implementation. All four major artificial water sources would be examined to determine if they meet National Park Service policy on habitat manipulation for native animal species and the minimum requirement for administration of wilderness. Maintenance of the guzzlers could continue during the study period.

Artificial water sources would have to meet the provisions of the section 4(c) of the Wilderness Act and of National Park Service *Management Policies* to remain. Those sources that clearly do not meet such statutory or policy standards would gradually be removed to avoid disruption to wildlife populations. Water sources that sustain wildlife populations, meet the standards of the Wilderness Act, and meet National Park Service *Management Policies* would remain in place.

Proposed Action (alternative A)

The National Park Service would study three major artificial water sources for wildlife in the park. The study would determine whether the water source is functional and practical in sustaining targeted wildlife species. Dysfunctional water sources would be removed. Functional artificial water sources would have to meet the provisions of section 4(c) of the Wilderness Act and of National Park Service *Management Policies*. Those sources that clearly do not meet such statutory or policy standards would gradually be removed to avoid disruption to wildlife populations. Water sources that sustain wildlife populations, meet the standards of the Wilderness Act, and meet National Park Service *Management Policies* would remain in place.

No Action (alternative B)

The three major artificial water sources in the park would remain but would not be studied. They would not be maintained or repaired but would be removed if they began to pose a hazard to wildlife. They would deteriorate and eventually fail. No new sources would be installed.

Maximum Protection (alternative C)

All artificial water sources in the park would be removed immediately, and new sources would not be installed. Their propriety and efficacy would not be scrutinized.

National Park Service *Management Policies* allows for habitat manipulation to aid a wildlife population under prescribed and limited circumstances. This alternative would remove human intrusions from the natural zone, including artificial water sources, rather than manipulate the environment.

Minimum Requirements (alternative D)

All artificial water sources in the park would be maintained without analysis. New sources could be installed with NEPA compliance, but the propriety and efficacy of existing sources would not be scrutinized. More alteration of natural features in the park would be allowed.

DESERT TORTOISE RECOVERY

New Proposed Action (alternative E)

In conformity with section 4(f) of the Endangered Species Act (16 U.S.C. 1533(f)), the U.S. Fish and Wildlife Service (FWS) published a recovery plan for the Mojave population of the desert tortoise (*Gopherus agassizii*) in June 1994. The recovery plan fulfills, in part, the statutory obligation of the Department of the Interior under the Endangered Species Act. The proposed action would adopt the primary recommendation of the *Desert Tortoise Recovery Plan*, except fencing by designating the entire nondeveloped zone in the park (approximately 789,000 acres) as a desert wildlife management area (DWMA).

The Joshua Tree desert wildlife management area would lie partially in the Northern and Eastern Colorado recovery unit and the west Mojave recovery unit. The National Park Service would then implement the management actions recommended in the *Desert Tortoise Recovery Plan*. Nearly all of the plan's recommendations are already in force in the park under National Park Service regulations designed to protect the park and its resources.

Proposed Action (alternative A)

In conformity with section 4(f) of the Endangered Species Act (16 U.S.C. 1533(f)), the FWS published a recovery plan for the Mojave population of the desert tortoise (*Gopherus agassizii*) in June 1994. The recovery plan fulfills, in part, the statutory obligation of the Department of the Interior under the Endangered Species Act. The proposed action would adopt the primary recommendation of the *Desert Tortoise Recovery Plan* by designating the entire nondeveloped zone in the park (approximately 789,000 acres) as a desert wildlife management area (DWMA).

The Joshua Tree desert wildlife management area would lie partially in the eastern Colorado recovery unit and the western Mojave recovery unit. The National Park Service would then implement the management actions recommended for in the *Desert Tortoise Recovery Plan.* Nearly all of the plan's recommendations are already in force in the park under National Park Service regulations designed to protect the park and its resources.

No Action (alternative B)

No formal action would be taken to implement the recommendations of the recovery plan, but National Park Service regulations or policies already in place prohibit the disturbance of natural resources. Off-road vehicles, dogs in the backcountry, and feral burros and horses are restricted.

No further action would be taken to regulate public use. The National Park Service would be required to consult with the FWS on actions that could affect the desert tortoise.

Maximum Protection (alternative C)

Under this alternative, 36.9 miles of eight roads (Berdoo Canyon, Pinkham Canyon, Thermal Canyon, Thermal-Pinkham connector, Black Eagle Mine, Grubstake Canyon, Powerline Roads east and west, and the west Eagle Mountain aqueduct access road) would not be opened. All are on land added to the park in 1994 and the first six lie in designated critical tortoise habitat.

Minimum Requirements (alternative D)

Joshua Tree National Park would continue to be managed under the mandates of the Organic Act of 1916 and the Wilderness Act of 1964 and would regulate public conduct accordingly.

CONCLUSION

All alternatives presented were considered for management of the backcountry and wilderness areas in Joshua Tree National Park. The alternatives provided a basis for comments regarding management direction in protecting the park. The new proposed action would ensure that there would be no additional land disturbance, that previously disturbed lands would be reclaimed, that a wide variety of visitor experiences would be enhanced, and that conflicts would be minimized through zoning. Group sizes, trail allocations and designation, and a climbing management plan would be addressed.

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PURPOSE AND NEED FOR THE PLAN

INTRODUCTION

This amendment to the *General Management Plan for Joshua Tree National Park* would guide the management of natural and cultural resources, visitor uses, and National Park Service administrative practices in the natural zone of what was Joshua Tree National Monument. It would also zone all of the approximately 234,000 acres added to the national park on October 31, 1994.

The draft *General Management Plan Amendment and EIS* and the *Supplement to the Draft General Management Plan Amendment and EIS* present a proposed action and four alternatives (including a no-action alternative). After review, comment, and modification, the final version of the new proposed action (alternative E), when used together with the 1995 *General Management Plan*, would guide management of Joshua Tree National Park for the next 10-15 years. During that time the National Park Service could alter decisions made under this plan only with compliance with NEPA, public involvement, and other consultation as required by law. Because this amendment primarily addresses wilderness and backcountry management issues, the National Park Service would review the adopted alternatives at 5-year intervals.

The new proposed action (alternative E) and its alternatives recommends actions that would better protect the park's resources and afford visitors a wide array of recreational opportunities. This document also analyzes the environmental consequences of each alternative.

BRIEF DESCRIPTION OF THE PARK

Joshua Tree National Park is located in the Mojave and Colorado Deserts of southern California. The park lies along the east-west transverse ranges of the Little San Bernardino Mountains. The south boundary follows the base of these mountains along the northern perimeter of the Coachella Valley; the Morongo Basin defines the north boundary. The park lies in San Bernardino and Riverside Counties.

Wilderness

Of the park's approximately 794,000 acres, 585,040 acres are legislatively designated as wilderness or potential wilderness and are set aside for the preservation of the most primitive and unconfined forms of recreation. Access is limited to hikers and pack animals and development is generally prohibited.

Features

The compressed transition zone between the Mojave and the Colorado Deserts makes it possible to cross from one desert to the other in less than 65 miles. The park contains all or portions of the Little San Bernardino, Cottonwood, Hexie, Pinto, Coxcomb, and Eagle Mountain

ranges. The eastern portion of the park averages 2,000 feet in elevation, while the western half lies primarily above 4,000 feet. Extremes in elevation range from 1,000 feet at Pinto Well to 5,900 feet at Quail Mountain. Major valleys include the Pinto Basin, Juniper Flats, Covington Flats, and Pleasant, Queen and Lost Horse Valleys (figure 1).

Joshua Tree has unusual desert plants and animals and spectacular geological formations. The name Joshua Tree signifies that the park has a natural history focus, but the area also has a rich and varied cultural history. Humans, from prehistoric times to the present, have lived in this desert environment.

PLANNING DIRECTION

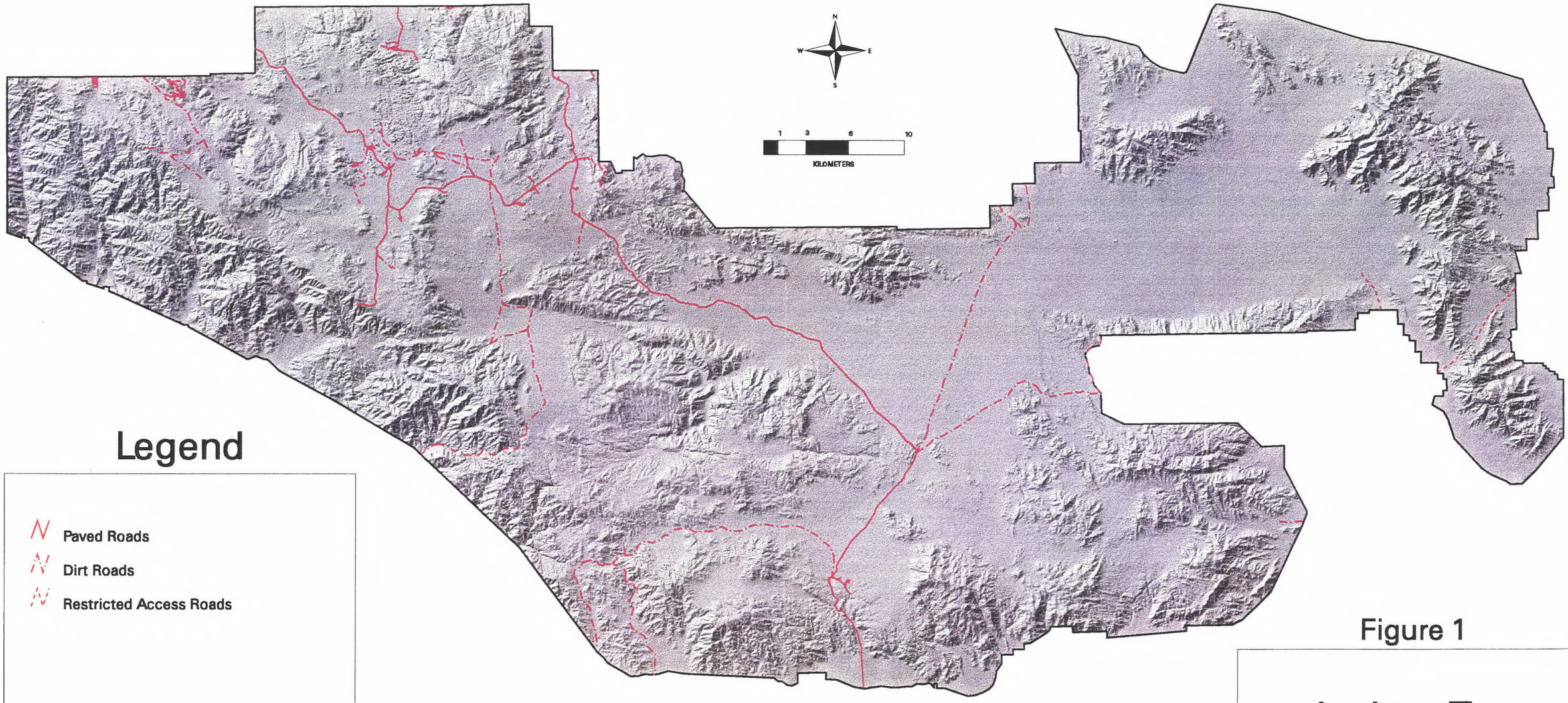
National Park Service management goals guided the formulation of the proposed action and the alternatives. The management goals are derived from:

- park purpose
- significant resources
- primary interpretive themes

On October 31, 1994, Congress established Joshua Tree National Park and abolished the national monument of the same name that had been proclaimed in 1936. In creating Joshua Tree National Park and other Federal reservations in the California desert, Congress intended to:

- preserve the unrivaled scenic, geological, and wildlife values associated with these spectacular natural landscapes,
- perpetuate the significant and diverse ecosystems of the California desert in their natural state,
- protect and preserve historical and cultural values of the California desert associated with ancient Indian cultures and western exploration and settlement,
- preserve sites that exemplify the mining, ranching, and railroading history of the old West,
- provide opportunities for compatible outdoor recreation, protect and interpret ecological and geological features and historic, paleontological, and archeological sites,
- maintain wilderness values,
- promote public understanding and appreciation of the California desert, and
- retain and enhance opportunities for scientific research in undisturbed ecosystems

The act of August 25, 1916, the Organic Act of the National Park Service (16 USC 1), prescribed that the "fundamental purpose of...parks...is to conserve the scenery and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." In 1970, Congress declared that the Organic Act provisions, including the statement of fundamental purpose, would apply to all areas of the national park system "to the extent that such provisions are not in conflict..." with the statute that specifically applies to that particular area (16 USC 1c[b]).



Legend

- Paved Roads
- Dirt Roads
- Restricted Access Roads

Figure 1

Joshua Tree National Park Topography

The vast majority of the land in Joshua Tree National Park is designated by law as wilderness, either by the act of October 20, 1976, or the act of October 31, 1994. The Wilderness Act of 1964 further describes the purpose of wilderness designations, which is to preserve lands in their natural condition "for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness."

The Wilderness Act defines wilderness as "an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain, . . . an area of undeveloped Federal land retaining its primeval character and influence without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions . . ." The Wilderness Act also generally prohibits motor vehicles, motorized equipment, mechanized transport, motorboats, permanent roads, temporary roads, landing of aircraft, commercial enterprises, and structures and installations. The act contains some limited exceptions to these prohibitions.

The purpose of Joshua Tree National Park is to preserve the natural and cultural resources of the Mojave and Colorado Deserts so that the resources can be interpreted, understood, and enjoyed by present and future generations.

RESOURCE SIGNIFICANCE

Natural Resources

Joshua Tree National Monument was originally set aside to preserve an ecologically dynamic component of the California Desert — much more than just Joshua trees. The east-west transverse ranges support examples of Mojave and Colorado Desert ecosystems. The elevations range from almost 6,000 feet to near sea level, which creates an unusual compressed transition zone between the Mojave Desert and the Colorado province of the Sonoran Desert. Early proponents of the monument envisioned a representative segment of the two deserts that would be large enough to embrace a self-sustaining natural system. This system contains biotic and abiotic components that influence each other and are, in turn, influenced by climate, fire, earthquakes, and other natural phenomena. In 1994, the California Desert Protection Act enlarged the monument to include key parts of the transverse ranges so that the park would have ecologically determined boundaries.

The park's primary natural resources include the Mojave and Colorado Desert vegetative communities and the wildlife that is dependent on them. Most notable are the Joshua tree forests, the fan palm oases, and riparian communities. Animals such as bighorn sheep, desert tortoise, deer, coyote, bobcat, mountain lion and a wide range of birds and reptiles are prominent. Water, in the form of springs and seeps and occasional sheet flows, conserves the plants and wildlife.

There are exceptional geological features in the park. Mountains and basins dominate the landscape. Unusual and attractive rock formations rise from the desert. Natural quiet and clear night skies are essential for the visitor to realize the beauty and tranquility of the park.

Cultural Resources

The geological and biological diversity of the Joshua Tree area supported early human subsistence. In the post-Pleistocene epoch, the climate was milder and wetter than it is today. The Pinto Basin was a shallow lake 5,000 to 7,000 years ago, which narrowed to a river or stream. The people of the Pinto Basin complex lived along its banks. Because the water and lush vegetation lured animals to the area, big game hunting was the predominant means of subsistence. As the climate changed, the Pinto Basin slowly dried up and populations of animals and people diminished. Human occupancy concentrated outside what is now the park to the palm canyons in the lower valleys and to the cooler mountains. People returned seasonally to trade, hunt, and harvest.

The park contains early Pinto culture sites and traces of other prehistoric and historic American Indian cultures as well as remains of Euro-American gold mining, homesteading, and subsistence cattle ranching. The park is archeologically, ethnographically, and historically diverse and exhibits a continuum of cultural adaptations. There are significant collections of prehistoric and historic American Indian artifacts and late 19th-century and early 20th-century non-Indian artifacts. These artifacts document the park's importance to east-west migrations from prehistoric times. The remnants of past human occupations illustrate the adaptations that different groups made to live in the arid desert environment.

Recreational Resources

The natural and cultural resources provide outstanding recreational opportunities for the more than 1 million visitors who come to the park annually. Topographic relief and associated changes in temperatures encourage year-round visitor use. The park provides some of the most diverse desert wildflower displays in the southwestern United States. There is also a wide variety of wildlife to observe. Joshua Tree is a popular location for the sightings of particular bird species not easily found elsewhere. Opportunities to see, photograph, and study cultural resources also draw visitors. Old mines, ranches, and prehistoric rock art are all popular sites. Massive boulders and rock outcrops provide some of the best rock climbing in the country. Many families like to camp in the park so that they can scramble on the maze of boulders nearby. Skilled and novice technical rock climbers from around the world are attracted to the challenging climbing routes.

Wilderness Resources

The wilderness resource is a preeminent feature of the park. Approximately 75 percent of the park has been designated by Congress as wilderness. Wilderness provides an opportunity for recreational experiences that are primitive, nonmechanized, and nonmotorized, such as hiking, horseback riding, and climbing. Such experiences are intended to provide opportunities for solitude. In wilderness, visitors do not remain; they leave the area in an unimpaired state, with little or no trace of their presence.

PRIMARY INTERPRETIVE THEMES

The following interpretive themes are the most important concepts for visitors to understand about the park:

- Joshua Tree National Park is comprised of two biologically different environments, the Mojave and the Colorado Deserts, that merge within the park boundaries to create an unusual ecological transition zone. Lush palm oases and springs draw importance to the essential nature of water for a healthy, functioning desert ecosystem.

- The Joshua tree, with its unusual shape and adaptation, is a perfect vehicle for understanding the interdependence of organisms living in the desert.

- Plants and animals have evolved to survive in the heat and drought. These adaptations produced an interesting array of life-forms. Humans, from prehistoric times to present, also adapted to an environment with little water. People who have made this area their home adapted and provided a colorful and varied human history.

- The picturesque landscape, including mountain ranges, desert basins, and massive rock outcrops, contributes to the park's significance. The dynamic processes that formed the area, including erosion and earthquakes, continue.

- Deserts have suffered a great deal of human abuse. The arid landscapes are slow to heal, and tracks made by a single vehicle in the desert soil can often be seen for many years. Fragile desert ecosystems survive in a delicate balance. They quickly manifest even the subtle environmental changes brought about by humans. Protection of the California Desert can only be accomplished from an ecosystem-wide perspective that promotes harmonious relationships between people and the environment. The "leave no trace" ethic must be taught to park visitors.

- Wilderness is an area of special protection affected primarily by the forces of nature. The imprint of human activities is substantially unnoticeable. People are visitors who do not remain. The park offers the opportunity for visitors to experience nearly 600,000 acres in one of the largest wilderness areas remaining in southern California.

There are a number of natural and cultural history interpretive themes in the broader context of the national park system, including plains, plateaus, mesas, cuestas and hogbacks, mountains, vulcanism, sculpture of the land, caves and springs, paleontological epochs, deserts, streams, cultural development, indigenous people, and European colonial exploration and settlement.

MANAGEMENT GOALS

The *General Management Plan* developed goals to achieve the park's purpose. This amendment retains those goals, which are to:

- manage land and wilderness to preserve them unimpaired for future generations,
- participate cooperatively in the preservation of ecological units that extend beyond the park boundary,

- improve knowledge of natural and cultural resources,
- manage visitation more effectively and reduce impacts associated with dispersed and poorly defined visitor use facilities,
- educate park visitors regarding the National Park Service mission and the natural and cultural resources of the park,
- facilitate cooperative planning throughout the California Desert ecosystem with other public agencies and communities,
- improve park circulation with a focus on safety, visual quality, and visitor experience, and
- improve the effectiveness of park operations

These eight goals would be achieved in different ways and to varying degrees by the proposed action or the alternatives.

PLANNING ISSUES AND MANAGEMENT CONCERNS

The *General Management Plan* recommended that this *Backcountry and Wilderness Management Plan* be written to guide management of the natural zone of Joshua Tree National Monument and the 234,000 acres added to the park on October 31, 1994. The *General Management Plan* divided the old monument into management zones: developed, natural, and cultural. The natural zone was further subdivided into the natural environment and wilderness subzones. The *General Management Plan* focused almost entirely on the park's developed zone and deferred addressing backcountry and wilderness management to this amendment.

Planning issues for this amendment were identified through the public scoping process, in the *General Management Plan* itself, or as a result of other statutory requirements. The major planning issues follow:

MANAGEMENT ZONING

The addition of 234,000 acres to the park required that the National Park Service include that land within the framework of management zones that was established for the former monument. Congress designated certain of the added land as wilderness, which automatically placed it in the wilderness subzone of the natural zone. Some of the land is not wilderness but will not be developed. This land is zoned as the natural environment zone, now referred to as the backcountry transition subzone. Some of the added land could be zoned as developed to accommodate roads. Congress provided for the protection and conduct of special right-of-way activities by the Metropolitan Water District of Southern California (MWD) on some of the added land that is designated as a special use zone.

VISITOR ENJOYMENT

Trails

Inadequate control over the actions of increasing numbers of visitors has resulted in impacts to resources. The proliferation of trails, created not by thought or design but by passage of people or animals, has created a network of often redundant social trails that impact vegetation. The social trails concentrate use in only a small part of the park while other areas, suitable for similar experiences, are ignored. These social trails cause compaction of the soils and denude areas of vegetation. This *Backcountry and Wilderness Management Plan* designates a trail network to minimize such impacts.

Roads

This plan examines more than 100 miles of dirt road or tracks that traverse new land added to the park in 1994. A few were constructed, but most were created by the passage of vehicles. These roads, tracks, and jeep trails often lead to campsites marked by litter, fire rings, circles of compacted soil, areas denuded of vegetation, and hill-climb areas. Some are in designated wilderness and are automatically closed by law. They are not subject to the decision-making

processes of this plan. Other traverse nonwilderness added to the park in 1994. Such roads provide 4-wheel drive access to scenic areas, which could be important to maintain. Holders of valid mining claims or owners of inholdings may have to use dirt roads that could be closed by the wilderness designation or by actions recommended in this plan. Such use would require National Park Service authorization. This plan determines which roads will remain open to public use.

Climbing

The quartz monzogranite was once a molten mass, which was forced upward or intruded into the overlying older Pinto gneiss. Erosion over the ages has stripped away the overlying gneiss and exposed the monzogranite outcrops for which Joshua Tree National Park is famous. Within the monzogranite, those areas with more widely-spaced joint cracks weather more slowly than others and form the high rock piles, called inselbergs. In some piles, well-defined joint systems are obvious; in other piles, smaller boulders have collapsed and obscured the underlying joint pattern. This geologic activity has made Joshua Tree National Park world renowned for the quality of its rock climbing.

A wide variety of climbing options, ranging from scrambling on the boulders in campgrounds to highly technical climbs, are available in the park. This wide spectrum of climbing opportunities (faces, overhangs, crags, etc.) encompasses all levels of difficulty. Approximately 5,400 routes exist on 700 rock formations and are concentrated over about 100,000 acres. These formations vary in size and can support one to 40 different climbing routes. Many climbs are a mix of crack and face climbing. Baseline data for both the number of routes and the number of named rock formations has been derived by compiling information from Alan Bartlett's rock climbing guides to Joshua Tree National Park and Randy Vogel's *Joshua Tree Climbing Guide.*

When many popular climbing areas, such as Yosemite and Grand Teton National Parks, City of Rocks, etc., are inaccessible because of inclement weather, temperate winters draw climbers from all over the world to Joshua Tree National Park. The Mojave Desert provides exceptional opportunities for solitude and communing with nature while climbing.

The climbing aid that generates the most controversy is bolting. Climbers place bolts for protection when no natural method of protection exists. This type of climbing generally takes place on rock faces devoid of cracks (called face climbing). The placement of permanent expansion bolts in the rocks to facilitate climbs has been practiced at Joshua Tree and other national parks since technical climbing was introduced.

Top roping and clean climbing can provide protection for many climbs. The desire to lead face routes and the recent development of "sport climbing" requires the use of bolts. One bolt displaces approximately .4 cubic inches of rock. The preliminary analysis of the Joshua Tree National Park Fixed Anchor Survey estimates that there are slightly more than 7,100 bolts in the entire park.

In recent years, climbers have made a serious effort to camouflage bolt hangers and substitute rock-colored chains and/or webbing for the brightly colored webbing historically found at rappel stations. This is being done to lessen visual impacts associated with climbing.

Since February 1993, the park has prohibited new bolts and replacement of existing bolts in wilderness until the completion of the *Backcountry and Wilderness Management Plan.* In permitting recreational activities, including rock climbing, the National Park Service must ensure that no damage to cultural resources occurs and that every effort is made to protect the park's natural resources and wilderness values.

Automobile Camping

Park regulations require that visitors in automobiles camp only in designated, established campgrounds. This plan examines this policy to determine if automobile camping should be permitted along dirt roads.

Group Sizes, Backcountry Camping, and Area Closures

Group size limits have not been imposed on overnight or day users of the natural zone. This plan determines if group size limits should be adopted to enhance the visitor experience of the backcountry transition and wilderness subzones. A related planning issue involves whether to limit backcountry camping to designated and hardened sites or to permit dispersed camping anywhere in the backcountry under some or no specific restrictions.

The plan adopts areas limited to day use only or closed to public access seasonally or permanently. One area (Keys Ranch) has been closed to all visitors except when accompanied by National Park Service personnel. This restriction is for the protection of cultural resources. Other areas are limited to day use only for the protection of wildlife, park facilities, and historic sites.

The act of November 10, 1978 (16 USC 1a-7[b]), requires that every general management plan prepared by the National Park Service include identification of visitor carrying capacities. The National Park Service has concluded at this stage in the planning process that insufficient data exists to establish a carrying capacity for the natural zone of the park and for all land added to the park in 1994.

RESOURCES MANAGEMENT

Artificial Water Sources

Several artificial water sources ("guzzlers"), primarily for bighorn sheep, are on park land. Two such sources were constructed on former BLM land. There are circumstances under which the artificial manipulation of natural systems could be permissible in the park, including in wilderness. The artificial sources in the park, however, may have been installed without attention to National Park Service management objectives. Some water sources no longer function and have been broken for many years. Other systems may or may not serve their intended purpose. The *Backcountry and Wilderness Management Plan* establishes the need to analyze the four major artificial water sources installed for wildlife in designated wilderness and if such sources should be removed or maintained.

Desert Tortoise

On June 28, 1994, the FWS adopted a recovery plan for the Mojave population of the desert tortoise (*Gopherus agassizii*). The *Desert Tortoise Recovery Plan* recommended that Federal land management agencies, primarily the BLM and the National Park Service, designate desert wildlife management areas (DWMAs) on the land that the agencies administer. A designated DWMA is a geographic area of a prescribed minimum size and general location, arrayed in relationship to other such areas to protect a full complex of desert wildlife, including the desert tortoise.

Although designated desert wildlife management areas are a creation of the *Desert Tortoise Recovery Plan*, their aim is to protect a diverse ecosystem composed of many species at a landscape level. The National Park Service generally refrains from single species management, although species listed under the Endangered Species Act are an exception to this policy. Designation of a management area is more than single species conservation. It emphasizes protection of sensitive as well as nonsensitive components of communities and protects tortoise habitat as well as habitat for other native species.

The *Desert Tortoise Recovery Plan* recommended the kind of activities that should or should not be permitted in a management area to minimize human impact on the survival of the officially threatened desert tortoise. The *Desert Tortoise Recovery Plan* recommended the designation of a Joshua Tree designated wildlife management area that is largely coterminous with the park. The planning issue involves the extent to which the National Park Service and this draft GMP amendment will seek to implement the *Desert Tortoise Recovery Plan.*

ADJACENT LAND USE

Developments and other land uses adjacent to the boundary threaten the integrity of the park's resources and wilderness values. Surrounding land use has changed significantly since the 1936 proclamation of the monument. Towns and cities and their associated infrastructure and recreational amenities, interstate and state highways, subdivisions, utility corridors, mining, military facilities, and agricultural interests are now on or near the park boundary. Other concerns include the effects of air and water pollutants, invasion of nonnative species from adjacent land, groundwater drawdown, and noisy overflights that affect wilderness solitude. The park's resources are seriously threatened by illegal activities and uncontrolled access along the boundaries, such as off-road vehicle use, theft of desert vegetation and archeological resources, poaching and reptile collecting, wood cutting, and dumping of hazardous and nonhazardous solid waste.

Joshua Tree National Park has been part of an international biosphere reserve since 1984. Fulfillment of the biosphere reserve concept and long-term protection of ecological units that extend outside of the boundary are made more difficult by land use and development around the park. Congress revised the monument boundaries in 1950 to exclude nearly 250,000 acres to accommodate mineral extraction. The configuration of the 1936 monument that had been designed by biologists to protect the natural systems of two deserts was destroyed in many areas. Congress acted in 1994 to return substantial portions of the land removed in 1950.

The development of the west Mojave and the northern and eastern Colorado coordinated management plans will assist to ensure protection of ecological units in the California Desert.

The BLM leads the development of these interagency plans with National Park Service participation. These regional plans will adopt the management strategies of this *Backcountry and Wilderness Management Plan* for the sections of those plans that pertain to the park and will meld the appropriate strategies with activities on adjoining land.

RELATIONSHIP TO OTHER PLANS

The document will constitute the *Joshua Tree National Park Backcountry and Wilderness Management Plan.*

Other plans that address park management at a more detailed level already exist, such as the *Fire Management Plan.* Other plans may have to be revised or developed. The *Land Protection Plan* of 1986 was amended in 1996. Both the original *Land Protection Plan* and the 1996 revision concluded that the National Park Service should acquire nearly all 57,000 acres of nonFederal land in the park (the exception would be the Congressionally protected MWD land). The *Land Protection Plan* regards all land as essential to protecting the resources of the park and advocates making them available for public enjoyment.

There are 12 patented and 33 unpatented mining claims in the park. The National Park Service is determining the validity of several claims. Anticipated development associated with the claims is minimal. There is no need for Joshua Tree National Park to develop a separate *Minerals Management Plan.* Instead, the *Report on Claim Status for Joshua Tree National Park* was prepared. That report, dated March 26, 1997, lists all claims, pinpoints their general location on master title plats, and provides relevant information.

The National Park Service will manage claims in accordance with the regulations at 36 CFR part 9, subpart A and the NPS *Guide to Managing Mining Claims.* All operations in connection with a claim require an NPS-approved plan of operations. Operations include access to a claim other than by foot or pack animal. Prior to approving operations in connection with claims, the National Park Service will first determine if unpatented claims are valid. This requirement does not apply to the 12 patented claims. For any operation that merits National Park Service approval, the National Park Service would first seek to acquire the claim. Any operator meeting National Park Service standards must also be in full compliance with laws of the state of California and the counties of Riverside and San Bernardino. Approved operations would be governed under the 9A standards, which require a bond and reclamation. The bond would always be posted with the Secretary of the Interior or his designee, the Superintendent of Joshua Tree National Park.

Abandoned mines are a minerals management issue. The most significant of the mines is an MWD gravel pit, approximately 20 acres in size, in the east Coxcomb Mountains. Ownership of this land may soon pass to the National Park Service. Many other small scars remain from decades of mining.

The *Resources Management Plan* (RMP) was adopted in 1993. It contains a project statement on the reclamation and restoration of disturbed land (including closed tracks and dirt roads) that will be updated to include the land that was added to the park in 1994. It will establish a protocol for the systematic monitoring of visitor impacts to the natural and cultural resources of the backcountry transition and wilderness subzones and will consider new project statements.

The National Park Service will revise the RMP project statement on inventory, documentation, evaluation, and management of cultural resources to include the land added in 1994.

The *Interpretive Prospectus* will not be revised as a result of this *Backcountry and Wilderness Management Plan.* However, the National Park Service will revise the *Compendium* of public use restrictions, closures, and conditions as required by regulations at 36 CFR 1.5 upon the adoption of the proposed action or other alternatives in this plan. This environmental impact statement will constitute the environmental review under applicable laws for any revisions to the *Compendium.*

The decisions made as a result of the final approved version of this *Backcountry and Wilderness Management Plan* will be incorporated into those sections of the ongoing west Mojave and northern and eastern Colorado Desert coordinated management plans pertaining to Joshua Tree National Park. The BLM serves as the lead Federal agency in the development of those plans.

PARKWIDE ALTERNATIVES

Joshua Tree National Park contains an extraordinary cross section of the California Desert. The park spans two major desert ecosystems and an unusual ecological transition zone. It has tremendous biological diversity, vast desert landscapes, and rich human history. The size of the park and the variety of its resources provide for a broad range of visitor experiences. To ensure that these values are preserved, the park would be managed to protect the Mojave and Colorado Desert ecosystems and their biological and cultural resources.

This *Backcountry and Wilderness Management Plan* contains a range of alternatives under certain guiding principles and key assumptions. The guiding principles follow:

- The National Park Service would manage visitor use of the natural zone and of the new land to minimize resource impacts.

- The park would provide visitors with opportunities to experience desert environments and to learn about the natural and cultural resources.

- Visitors would be able to engage in a wide range of recreational pursuits from operating 4-wheel drive vehicles on rough and challenging dirt roads to the primitive experience of hiking in remote and undisturbed wilderness.

- Nearly 75 percent of the park would be managed to protect the wilderness resources and its character and values.

- The only areas of the added land that may be classified as part of the developed zone would be dirt roads that traverse that land and a possible primitive camp in the Little San Bernardino Mountains.

Management goals are to:

- preserve park resources unimpaired for future generations,
- coordinate the preservation of ecological units that extend beyond the park boundaries,
- improve management and knowledge of natural and cultural resources,
- manage visitation more effectively, and
- educate visitors regarding the National Park Service mission and the natural and cultural resources of the park.

In carrying out its management objectives, the National Park Service would consult with affected Indian tribes under laws, regulations, executive orders, and National Park Service policies. Pursuant to the National Historic Preservation Act (16 USC 470a[d]6[A] and 470f), the National Park Service would consult with affected Indian tribes when any National Park Service undertaking could affect a property of traditional religious or cultural importance to the tribe.

SUMMARY OF ALTERNATIVES

Planning Issues	The Plan Alternative E New Proposed Action	Alternative A Draft Proposed Action	Alternative B No Action	Alternative C Maximum Protection	Alternative D Minimum Protection
Trails	Implement a designated trail system. Allow foot use on all trails, corridors, and cross-country; stock use on designated trails only; bike use only on designated trails. Include 3.15 miles of equestrian trails in addition to those listed in Alternative A. Consider another 1.2 miles after maintenance/resource management review. At the discretion of the Superintendent, study the use of llamas in the park with the protection of resources and consistency with NPS mission the priorities. Access to remote areas where parking at a backcountry self-registration board is not required include Pinto Basin and the Coxcomb, Pinto, Eagle, Little San Bernardino, and Cottonwood mountains. Consider no new trail requests until the designated trails are inventoried, developed, and monitored for several years. Restore trails not designated as part of the trail system to a natural condition. Establish a parking area at the southern base of Berdoo/Thermal Canyon bicycle trail to provide a staging point for loading/off loading bicycles.	A designated trail system would be implemented. Foot use allowed on all trails, corridors, and cross-country; stock use on designated trails only; bike use only on designated trails.	Undesignated trails, mostly social trails, would be used. There would be no designated trail access points, maintenance, or signs. No trails would be open to public use.	Only a few trails would be designated with access points and signs. Only designated trails would be open to stock use and hikers. No trails would be open to bicyclists.	Undesignated trails, mostly social trails, would be open for all uses in nonwilderness; only stock and hiker use would be allowed on wilderness trails. There would be no maintenance or access points.
Road system	Designate 37.7 miles of unpaved roads as part of the developed zone; close all other dirt tracks in the non-wilderness additions to public motor vehicle use.	36.9 miles of unpaved roads would be designated as part of the developed zone; all other dirt tracks in the nonwilderness additions would be closed to public motor vehicle use.	Motor vehicles would be allowed on all driveable roads. Four additional roads would be opened.	All roads in nonwilderness additions would be closed to motor vehicles.	All roads in nonwilderness additions to the park would be designated as open.

Planning Issues	The Plan Alternative E New Proposed Action	Alternative A Draft Proposed Action	Alternative B No Action	Alternative C Maximum Protection	Alternative D Minimum Protection
	Reclaim all roads closed to vehicle access as part of the natural zone. In addition to the roads designated as open in Alternative A, open to public use the Snow Cloud Mine Spur (.8 miles).				
Climbing	Climbing committee will function as subcommittee of Joshua Tree National Park Advisory Commission, be chaired by a Commissioner, and comprised of representatives of climbing community, conservation organizations, and other individuals. Allow replacement of existing fixed anchors throughout the park. Use neutral or rock-colored hangers and chains for replacement and new fixed anchors. Accomplish replacement of existing bolts in a manner that removes the old bolt with minimum damage to the rock resource. Allow for use of power drills with a permit in the developed zone and backcountry transition subzone. Develop procedures for the establishment of new routes in the developed zone and backcountry transition subzone through a monitored process. Provide for a cap on the number of new fixed anchor (bolted) climbing routes per year. Authorize placement of new bolts not associated with a new route to reduce climbing impacts or to address climber safety.	New climbing bolts would be allowed by permit in nonwilderness. Replacement of existing bolts in the developed zone or the backcountry transition subzone would be permitted on an as needed basis. Replacing existing bolts and placing new bolts would not be permitted in wilderness.	The interim climbing management plan would remain in effect. Replacement of existing bolts and placement of new bolts would not be permitted in wilderness. Replacement of existing bolts and placement of new bolts would be permitted in nonwilderness as determined by the climbing community. Permits would be issued for use of power drills in nonwilderness.	Fixed-anchors (bolts) would occur only in the developed zone. No new bolted routes in the backcountry transition or wilderness subzone would be allowed, and replacement bolts would be permitted only in the developed zone. All bolts would be gradually removed from the natural zone.	Installation of new bolts or replacement of existing bolts would not be limited. Motorized drills would be permitted for installation of bolts in nonwilderness areas.

Planning Issues	The Plan Alternative E New Proposed Action	Alternative A Draft Proposed Action	Alternative B No Action	Alternative C Maximum Protection	Alternative D Minimum Protection
	Survey the developed zone and backcountry transition subzone to determine if fixed anchors impact resources or visitor experience and prescribe management actions. Provide that future levels of climbing-related impacts to wilderness do not exceed 1998 levels. Superintendent will consider approval of new routes in wilderness based upon recommendations of the Climbing Committee and, if approved, will issue a permit. Camouflage or remove bolts and hangers in wilderness that cause social conflicts or intrude on the wilderness experience. Provide prescriptions for management actions to prevent and mitigate resource impacts associated with climbing. Provide for fixed anchor-free zones.				
Auto Camping	No automobile camping outside of designated campgrounds. No development of automobile campgrounds on land added to the park in 1994, but NPS may study placing a primitive camp in the Little San Bernardino mountains.	Automobile camping outside of designated campgrounds would not be permitted. No new automobile campground would be established on land added to the park in 1994.	All automobile camping would be confined to designated campgrounds.	All automobile camping would be confined to designated campgrounds.	Automobile camping would be permitted along the length of any road in the developed zone of the lands added to the park in 1994.
Artificial Water Sources	Add a fourth water source, the Pine City guzzler, to the list of artificial water sources to be studied. Study each of the four major artificial water sources in the park. Water sources that sustain wildlife, meet the standards of the Wilderness	NPS would study three major artificial water sources in the park. Water sources that sustain wildlife, meet the standards of the Wilderness Act, and meet NPS *Management Policies* would remain.	Three major artificial water sources would remain, but would not be studied. They would not be maintained on an as needed basis. No new sources would be installed.	All artificial water sources would be removed immediately. New sources would not be installed.	All artificial water sources would be maintained without analysis. New sources and improvements to existing sources could be installed with NEPA compliance.

Planning Issues	The Plan Alternative E New Proposed Action	Alternative A Draft Proposed Action	Alternative B No Action	Alternative C Maximum Protection	Alternative D Minimum Protection
	Act, and meet NPS *Management Policies* could remain. Leave the determination of the period of the study and analysis to NPS biologists. Continue maintenance of the guzzlers during the study period.				
Closures	Maintain current restrictions. Close Keys Ranch unless accompanied by NPS personnel. Designate Lost Horse Mine, Lost Palms and Munsen canyons, Buzzard Springs, Rattlesnake Spring, Coxcomb Adit, Stubbe Springs, Wonderland of Rocks and Pushawalla as day use only.	Current restrictions would be maintained	Restrictions on overnight use would continue for certain natural and cultural resource sites in the wilderness and backcountry transition subzones.	Special resource protection areas would be designated with no public access during the summer months. Restrictions on overnight use would be maintained in backcountry transition and wilderness subzones and in certain cultural and natural areas.	All restrictions on overnight use in the backcountry transition and wilderness subzones would be removed.
Group Size	Establish different group size limits for overnight camping in the natural zone. Eliminate wilderness experience classes and establish group size limits for the backcountry transition subzone as 25 and the wilderness subzone as 12.	Different group size limits would be established for overnight camping in the natural zone. Within the wilderness subzone, two wilderness experience classes would have different overnight group size limits. Wilderness experience class A would be limited to 12, and wilderness experience class B would be limited to 8.	No limits on the size of groups would be established for overnight camping in the natural zone.	Group size limits would be imposed for overnight use.	No limits would be imposed on the size of groups in the natural zone for overnight camping.
Desert Tortoise Recovery	Adopt the primary recommendation of the *Desert Tortoise Recovery Plan*. Designate the entire natural zone as a desert wildlife management area.	The primary recommendations of the *Desert Tortoise Recovery Plan* would be adopted. The natural zone would be designated as a desert wildlife management area.	No formal action would be taken to implement the recommendations of the *Desert Tortoise Recovery Plan*. NPS regulations and policies would prohibit the disturbance of natural resources.	36.9 miles of eight roads would not be opened.	Joshua Tree would continue to be managed under the mandates of the organic act of 1916 and the Wilderness Act of 1964.

NEW PROPOSED ACTION (ALTERNATIVE E)

GENERAL DESCRIPTION

The new proposed action (alternative E) would constitute an amendment to the 1995 *General Management Plan.* It would also be known as the *Backcountry and Wilderness Management Plan.* The new proposed action would minimize disturbance to resources and ensure their preservation unimpaired but would still afford the public a broad spectrum of recreational enjoyment.

MANAGEMENT ZONING

Management zoning determines how specific areas in the park would be managed to protect resources and provide for visitor enjoyment. The National Park Service establishes zones in parks in four classifications — natural, historic, developed, and special use. Within each of these zones, subzones can be designated to allow for particular management needs. The 1995 *General Management Plan* zoned the land in what was then Joshua Tree National Monument.

The new proposed action would alter the zoning of land addressed in the *General Management Plan* in only one minor way. It would rezone the Gold Park Road corridor (0.5 miles long and 60 feet wide) from the backcountry transition subzone to the developed zone.

Figure 2 shows the proposed park zones, including the land added by the California Desert Protection Act of 1994. Figure 3 shows the land that was added to the former Joshua Tree National Monument.

The National Park Service evaluated each area added to the park in 1994 to determine its contributions to the preservation of natural and cultural resources and wilderness. Management zones were then designated for each area. The management zones for the entire park include:

NATURAL ZONE (789,253 acres)

Preservation of natural resources and processes are primary in the natural zone, and only uses that have no adverse effects are permitted. The *General Management Plan* divided the natural zone into two subzones: the natural environment subzone and the wilderness subzone. Alternative E retitles the natural environment subzone as the backcountry transition subzone.

Backcountry Transition Subzone (204,213 acres)

The backcountry transition subzone is land zoned for the conservation of natural resources and processes, but not legislatively designated as wilderness. In this subzone, the National Park Service could construct or operate minor facilities such as patrol stations or toilets, operate motor vehicles, land aircraft, and engage in other activities that are prohibited in wilderness. Since this subzone preserves natural resources, any proposed development would be minor. Recreational activities that are prohibited in wilderness, such as bicycle riding on trails, could be permitted.

Wilderness Subzone (585,040 acres)

This subzone is governed by the strictest preservation standards and includes designated wilderness, potential wilderness, and recommended wilderness or wilderness study areas. The land in this zone is managed for the preservation of wildness and its undeveloped and primeval character and influence regardless of category.

Wilderness is an area "where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain." It retains its primeval character without permanent improvements or human habitation. Wilderness provides outstanding opportunities for solitude or a primitive and unconfined type of recreation. Man's imprint remains substantially unnoticeable.

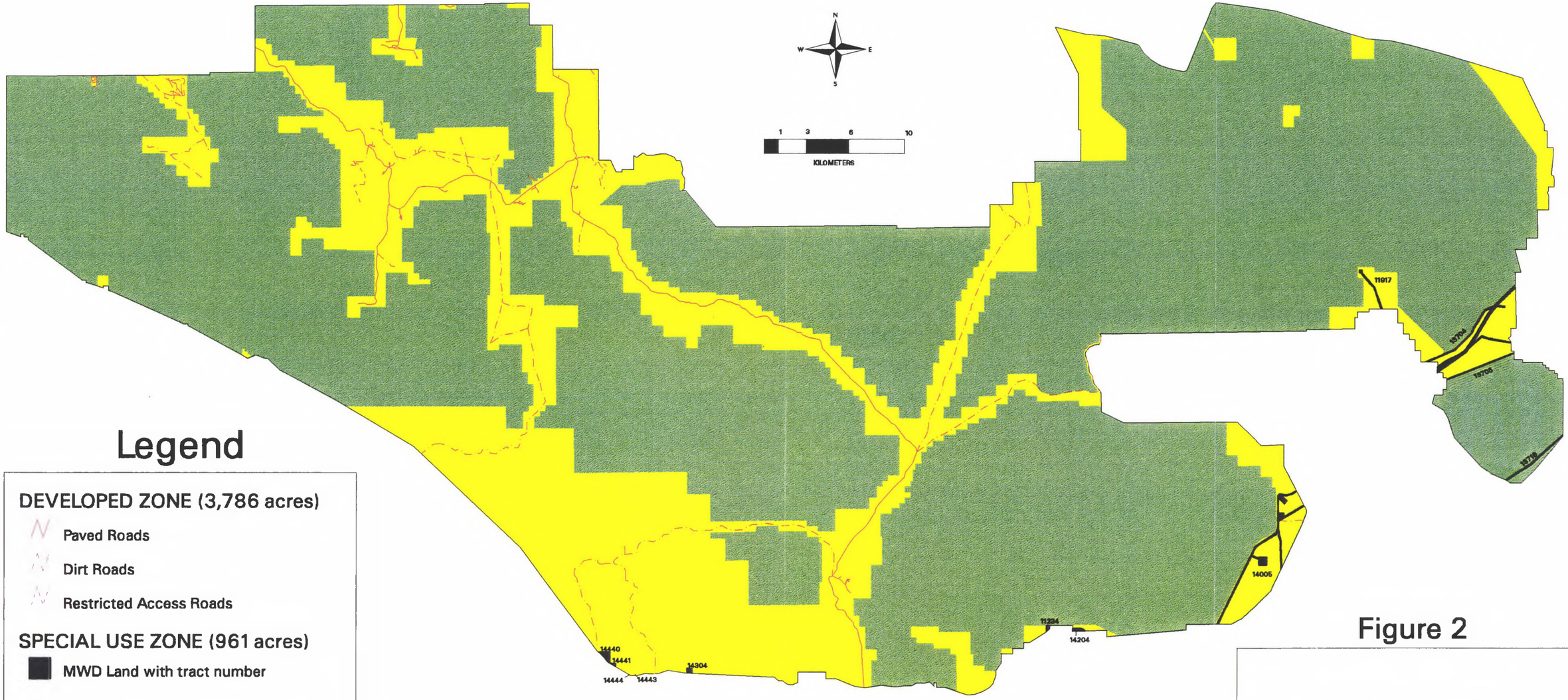
To ensure that areas are managed as directed by Congress, Section 4(c) of the Wilderness Act prohibits nine activities on those wilderness lands. Subject to specific exceptions, the Wilderness Act stipulates that there would be no commercial enterprise, no permanent road, no temporary road, no use of motor vehicles, no motorized equipment, no motorboats, no landing aircraft, no other forms of mechanical transport, and no structure or installation within any wilderness area. The Wilderness Act provides a major exception to seven of the nine prohibitions "...to meet the minimum requirements for the administration of the area for the purpose of this Act." The only activities not excepted from the prohibition area commercial enterprises and permanent roads.

The Wilderness Act recognizes recreation as an appropriate use of wilderness in a manner consistent with the underlying purposes of wilderness – maintaining naturalness and providing opportunities for solitude. Primitive and unconfined types of recreation may require the construction or maintenance of minimum facilities, such as trails. Trails providing access to and within wilderness serve the transportation needs of visitors and administrative personnel and are often a key tool to keep visitor use within the capacity of the wilderness. The location and type of trails to a wilderness area's boundaries, trailhead improvements, and the type of trail network within the area are important factors in influencing the number of visitors and in dispersing use to reduce environmental impacts and social impacts to visitors themselves. Trails are acceptable in a wilderness when they are constructed for these purposes. Similarly, climbing routes that use fixed anchors can also perform the same functions.

While recreation is a recognized use of wilderness, it is neither the only nor the most important use. Some thought should be given to leaving large portions of a wilderness area free of trails. Visitor use can be dispersed by constructing new trails where trails are already located or, more often, simply through better maintenance of the existing trail network.

DEVELOPED ZONE (3,786 acres)

This zone provides for the existence and maintenance of facilities to serve visitors. For the land added to the park in 1994, the developed zone consists exclusively of roads and possibly parking areas along roads. Alternative E proposes no other developments on the land added to the park in 1994 with the exception of a parking area at the southern base of the Berdoo/Thermal Canyon Bicycle Trail and the potential for a primitive automobile camp in the Little San Bernardino Mountains. This plan proposes that 37.7 miles of unpaved roads be designated open to public use. Because 4.7 miles of those roads lie within the special use zone on a MWD right-of-way, those acres are calculated in the special use zone; they are not included in the developed zone. The developed zone includes a buffer of 100 feet on either side



Legend

DEVELOPED ZONE (3,786 acres)

- Paved Roads
- Dirt Roads
- Restricted Access Roads

SPECIAL USE ZONE (961 acres)

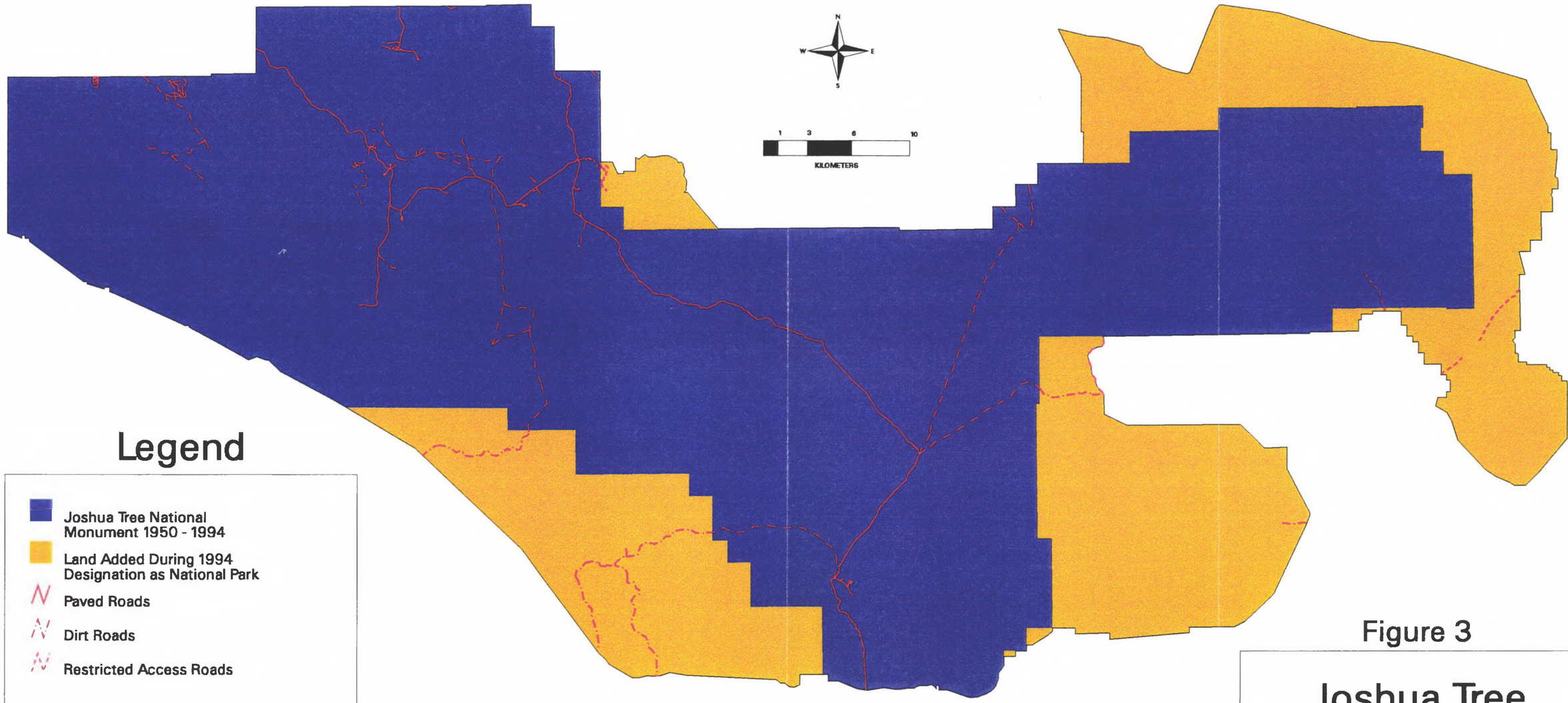
- MWD Land with tract number

NATURAL ZONE (789,253 acres)

- Wilderness Subzone (585,040 acres)
- Backcountry Transition Subzone (204,213 acres)

Figure 2

Joshua Tree National Park Zoning



Legend

- Joshua Tree National Monument 1950 - 1994
- Land Added During 1994 Designation as National Park
- Paved Roads
- Dirt Roads
- Restricted Access Roads

Figure 3

Joshua Tree National Park New Lands

of the centerline of roads and trails. Complete maps of the park's developed zones can be found in the park's *General Management Plan.*

SPECIAL USE ZONE (961 acres)

The special use zone includes land that the National Park Service expects would continue to be used for activities that are generally not appropriate in national parks but that have received special authorization. Special use zones accommodate circumstances where Congress has directly provided for activities that are otherwise incompatible with resource preservation and visitor enjoyment. The only special use zone in the new areas of Joshua Tree National Park is owned by the MWD. The zone also includes land that the MWD does not own but on which it has a Boulder Canyon Project Act (1928) right-of-way containing a 220-kv powerline (approximately 150 acres).

MWD land, obtained under the authority of a 1932 act of Congress, and rights-of-way obtained under the Boulder Canyon Project Act of 1928 are specifically protected by the California Desert Protection Act, section 406. Section 406 states that the incorporation of MWD fee lands into Joshua Tree National Park would not terminate the fee title to the MWD land. The law states:

> "Nothing in this title shall have the effect of terminating any validly issued right-of-way...granted or permitted to the Metropolitan Water District pursuant to the Boulder Canyon Project Act (43 U.S.C. 617-619b), which is located on lands included in the Joshua Tree National Park, but outside lands designated as wilderness..."
>
> "Nothing in this title shall have the effect of terminating the fee title to the lands or customary operation, maintenance, repair, and replacement activities on or under lands granted to the Metropolitan Water District pursuant to the Act of June 18, 1932 (47 Stat, 324), which are located on lands included in the Joshua Tree National Park, but outside of lands designated as wilderness under section 601(a)(2)..."

Two tracts of MWD land are in the park and not outside of land designated by section 601 of the California Desert Protection Act as wilderness. The tracts are #13503 and #13603. According to the report on the California Desert Protection Act of the House Committee on Natural Resources, the MWD agreed to abandon these parcels so as to enhance the management of Joshua Tree wilderness. These tracts are in the wilderness zone.

MWD use of its 1932 act fee land in the park and outside of wilderness, in accordance with the purposes of the act of 1932, are by law compatible with the park. However, the California Desert Protection Act modifies the manner in which the MWD may conduct its activities on 1932 act fee lands and 1928 rights-of-way in the park. The law prescribes that "such activities shall be conducted in a manner which would minimize the impact on park resources." Because of their special nature, the MWD lands and rights-of-way are designated as a special use zone.

The MWD owns 1,621 acres in the park. The special use zone includes only 811 acres of that land, which is likely to remain in MWD ownership in perpetuity for the operation and maintenance of the Colorado River aqueduct and associated facilities.

Some of the MWD land may not be needed in the future and could be sold or relinquished to the United States. For example, over 100 acres of MWD land lies inside wilderness. The MWD has committed to relinquish such land to the United States. The MWD special use zone includes National Park Service tracts numbered 11234 (west Cholla camp), 11917 (Pinto Well and road),

13704 (Coxcomb utility lines), 13705 (south Coxcomb tunnel), 13716 (powerline), 14005 (west Eagle Mountain aqueduct and associated camps and utility lines), 14204 (Hayfield tunnel), 14304 (camp), 14440, 14441, 14443, and 14444 (associated with a right-of-way for a 33-kv powerline). The tract numbers are listed and depicted in the *Land Protection Plan.*

The special use zone does not include the land with non-MWD power or right-of-way facilities that are now in the park, such as American Telephone and Telegraph's Belle Mountain microwave tower. That facility is on land that was added to the park in 1994. The California Desert Protection Act does not provide the same level of protection to that facility as was conferred on MWD facilities. When the right-of-way for the Belle Mountain microwave tower expires on March 19, 2014, the National Park Service would review and consider how best to reduce and/or eliminate the visual impact of the tower.

REDESCRIPTION OF 1995 GMP WILDERNESS ZONING

The new proposed action (alternative E) recalculates the amount of wilderness in the park, including the 1976 wilderness zone.

The 1976 act of Congress (PL 94-567) established 429,690 acres of wilderness and 37,550 acres of potential wilderness in Joshua Tree National Monument. The act directed the National Park Service to present to Congress a map and legal description of that wilderness.

The National Park Service published maps that were numbered 156̸20,003D and dated February 1977. The legal description that accompanied the official wilderness maps states that there were 422,320 acres of wilderness and 30,740 acres of potential wilderness in the monument for a total of 453,060. Since the act of 1976 states that the maps and legal description prepared by the National Park Service "shall have the same force and effect as if included in this Act," this amendment presumes that the acreage of 453,060 wilderness and potential wilderness is definitive.

In January 1997, the National Park Service detected errors that amounted to 200 acres in the maps and legal description cited above. Under authority of the 1976 act creating Joshua Tree National Monument wilderness, the errors were corrected. As a result, there were 422,520 acres of wilderness and 30,740 acres of potential wilderness, totaling 453,260, which is 13,980 fewer acres of wilderness and potential wilderness than Congress authorized in 1976.

Congress added 131,780 acres of wilderness in 1994. The total wilderness in the park is therefore approximately 585,040 acres.

On May 27, 1997, the National Park Service published a notice in the *Federal Register* under section 3 of PL 94-567 to convert 3,502.20 acres of potential wilderness, designated in 1976, to full wilderness. Thus, there are now 557,802 acres of wilderness and 27,238 acres of potential wilderness in the park for a total of 585,040 acres.

PROPOSED ADDITIONS TO DESIGNATED PARK WILDERNESS

The *General Management Plan* states that the *Backcountry and Wilderness Management Plan* would serve as a vehicle to determine if lands not now designated as wilderness should be proposed for designation.

The Former Joshua Tree National Monument

This proposed action recommends minor additions, totaling 9,060 acres, to the 1976 wilderness. The plan does not alter the 1976 wilderness boundaries, but recommends that the Secretary of the Interior and the President transmit to Congress a proposal for such revisions. Pursuant to section 3(c) of the Wilderness Act, Congress alone may designate wilderness in areas of the national park system.

This plan, along with the public hearings and notice in the *Federal Register* concerning this plan, fulfills the conditions for recommending wilderness boundary modifications or adjustments required. There are no nonfederal land or interests or mining claims within the additions recommended.

The five minor additions are depicted in figure 4 and are:

(1) to 1976 wilderness unit #7, T1S, R14E, section 36, W½, W½ of NE¼ — 400 acres

The 1976 wilderness provision did not designate this land as wilderness because it was a state-owned tract. Nor did the 1976 act designate it as potential wilderness, as Congress did for all other state-owned tracts in the monument, because this 400-acre tract was then on the outer boundary of the monument. Now that the park has been expanded to the north, and the lands to the north were designated wilderness in 1994, this tract represents an anomaly. It is an isolated island of Federal nonwilderness land surrounded on all sides by Federal wilderness.

(2) to 1976 wilderness unit #3, T3S, R9E, section 9, NW¼, SW¼, and SE¼ — 480 acres; section 10, S½ — 320 acres, section 15, N½ —320 acres; section 16, — 640 acres; section 21, E½ — 320 acres; section 28, E½ — 320 acres

This land was excluded from the original National Park Service wilderness proposal because there were several large nonfederal tracts when that proposal was made.

The National Park Service acquired the land, except for one State of California tract, after the wilderness proposal was made to Congress.

(3) to 1976 wilderness unit #6, T5S, R11E, section 1, W½, W½, E½ — 480 acres; section 12, NW¼, NE¼, NE¼, NW¼, W½, W½ — 240 acres; section 13, NW¼, NW¼, SW¼, NW¼, NW¼, SW¼ — 120 acres

This land has all the characteristics of wilderness with no development, and no developments are planned.

(4) to 1976 wilderness unit #6, T5S, R12E, section 29, N½, NE¼, SW¼, N½, SE¼ — 440 acres; section 28, NW¼, NW¼, S½, N½, S½ — 520 acres; section 27, S½, NW¼, SW¼, W½,

W½, SE¼, W½, SE¼, NE¼ — 300 acres; section 33, NE¼, NE¼, — 40 acres; section 34, W½, S½, SE¼, W½, NW¼, NE¼, SW¼, NE¼, NW¼, SE¼ — 480 acres; section 35, SW¼, SW¼, — 40 acres

This land was not included in 1976 wilderness because of a waterline from a spring in Lost Palm Canyon. That waterline was subject of a National Park Service special use permit that was issued in 1966 and expired in 1986. No one possesses any rights under California law to appropriate water from this source. Much of the waterline has now been removed.

(5) to 1976 wilderness unit #2, T2S, R8E, section 19, — 640 acres; section 30, — 640 acres; T2S, R 7E, section 22, E½, SE¼ — 80 acres; section 23, W½, SW¼, SE¼, SW¼ — 120 acres; section 24, E½, E½ — 160 acres; section 25, — 640 acres; section 26, N½ — 320 acres; section 27, E½ — 320 acres; section 34, N½, NE¼ — 80 acres

The 1976 wilderness provision did not designate this land as wilderness because of the presence of two National Park Service administrative roads and limited water development for wildlife at Stubbe Springs. The water development has since been removed and no replacements are planned. Under this alternative, the land would be administered as wilderness.

If the above changes were adopted, the land described above would be rezoned from the backcountry transition subzone to the wilderness subzone.

Land Added to Joshua Tree National Park in 1994

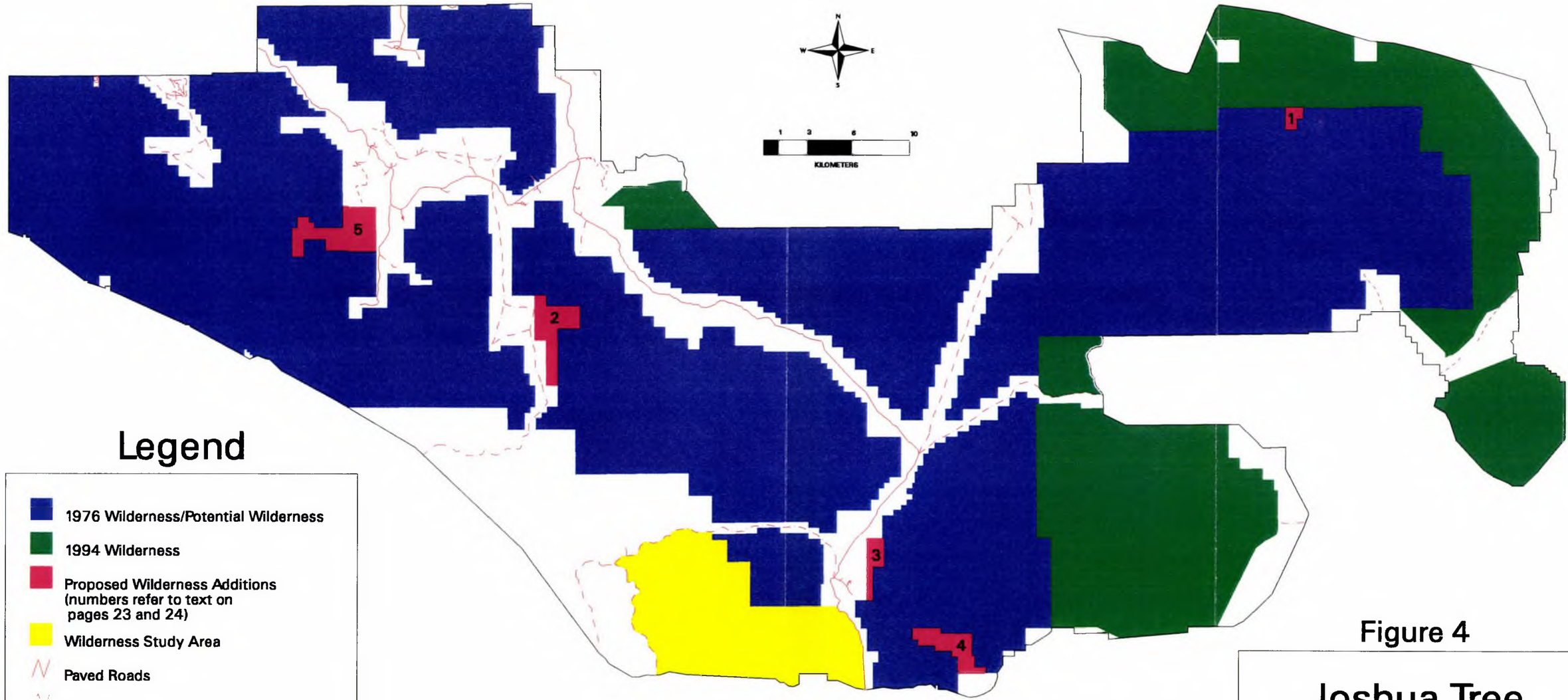
A review of suitability for wilderness designation should be conducted on a roadless area in the Cottonwood Mountains (see figure 4). The study should be completed within three years after the final version of this draft plan is adopted and should make a written determination of suitability or unsuitability. If the area were to be found suitable, the study would produce a recommendation by the Secretary of the Interior to the President under section 3(c) of the Wilderness Act. The area to be studied lies west of Cottonwood Road, south and east of Pinkham Canyon Road, south of the old monument boundary, and north of the MWD Colorado River aqueduct. The wilderness study area encompasses approximately 27,000 roadless acres and would extend wilderness unit 4. BLM did not conduct a wilderness review for this area under the Federal Land Policy and Management Act of 1976 because the area was fragmented by about 50 percent nonfederal ownership. The area is now federally owned.

INTERIM MANAGEMENT OF PROPOSED WILDERNESS AREAS

National Park Service policy directs that areas recommended for wilderness designation or for wilderness study be managed in such a way as to not diminish the wilderness suitability until the legislative process has been completed.

VISITOR ENJOYMENT

The National Park Service Organic Act directs the National Park Service to preserve park resources "unimpaired," while providing for the public enjoyment of those resources. Because



Legend

- 1976 Wilderness/Potential Wilderness
- 1994 Wilderness
- Proposed Wilderness Additions (numbers refer to text on pages 23 and 24)
- Wilderness Study Area
- Paved Roads
- Dirt Roads
- Restricted Access Roads

Figure 4

Joshua Tree National Park New Proposed Wilderness

public enjoyment cannot be sustained if park resources are damaged or compromised, resource protection must necessarily be the National Park Service's paramount responsibility. Within that constraint, the National Park Service must manage recreational activities and settings to protect park resources, provide for public enjoyment, promote public safety, and minimize conflicts with other visitor activities and park users. The National Park Service is directed to monitor recreational activities and assess their potential impacts on park resources. When there is potential for adverse impacts, the National Park Service would initiate appropriate policies or regulations response to prohibit or control the activity and avoid the adverse impacts. Therefore, the National Park Service should take a proactive stance to prevent degradation to resources, an adverse impact on wildlife, or diminishment of other visitors' enjoyment from occurring.

Trail Designation

A comprehensive system of trails and corridors would provide foot, bicycle, and equestrian access into the backcountry transition and wilderness subzones and foot and equestrian access into the wilderness subzone. Standard trail etiquette would be encouraged, and the U.S. Forest Service standards for "right-of-way" use would be adopted. A detailed map of the trail network is available at park headquarters.

Development of the trail system would provide for better resource protection and would occur over the next several years. Designated trails would be defined by an identifiable tread and maintained to varying degrees depending upon the zone or subzone in which it occurs. Existing trails would be evaluated. Some would be slightly re-routed if necessary for resource protection; others would be rehabilitated. All designated trailheads would be marked with signs. Designated corridors would be specifically defined routes of travel that follow the natural terrain, such as desert washes or rock passes. Corridors would not have maintained trail tread, but signs could be installed.

This trail system would provide park visitors with opportunities to experience the backcountry and wilderness of Joshua Tree National Park. At the same time, this system would establish a trail network that would require minimal expenditures of time, money, and effort to maintain. The construction or maintenance of trails in wilderness is necessary for the proper administration and protection of wilderness and public safety. However, when working on trails, motorized equipment, motor vehicles, aircraft, or mechanized transport would be used only after a minimum requirement determination for each project.

Backcountry and wilderness trails would be unpaved and only wide enough for single-file travel. Trails intended for horse and bike travel would also be only wide enough for traveling single file. Trails would be maintained and signed in keeping with the nature of the zone through which they pass. Signs would be more prevalent in the developed zone than in the backcountry transition and wilderness subzones. In the wilderness subzone, signs or markers would be installed only as necessary to define the trail and provide for visitor safety and resource protection. In the developed zone and backcountry transition zones, interpretive signs could be installed.

The new proposed action would designate approximately 270 miles of backcountry and wilderness trails. Nature trails total an additional 8.85 miles. See Appendix A for a list, including descriptions, of the trail and corridor system. Individual trail miles do not necessarily reflect the total mileage required for a particular destination.

Cross-country routes of travel, other than six designated corridors, would not be identified. Visitors could hike the open desert, but topographical maps and compasses would be recommended. Various publications and maps that can be obtained locally have identified many routes.

In addition to the designated and maintained equestrian trails, equestrians could use six corridors for horse travel. These corridors would follow topographical features and provide for primitive riding and hiking. The corridors would not be maintained as trails but may be signed. The designated corridors total approximately 55 miles. Use of the corridor concept would be encouraged within the wilderness subzone.

Fourteen backcountry self-registration boards for overnight camping would be provided; one more than exists now (see figure 5). All overnight campers in the backcountry and wilderness would park and register at 1 of the 14 backcountry board locations. An exception would exist for those accessing remote areas, such as the eastern Pinto Basin and the Coxcomb, Pinto, Eagle, Little San Bernardino, and Cottonwood mountains from outside the park boundary. Those entering the park in these remote locations would not be required to park at a backcountry self-registration board, but a permit would still be required. Permits could be obtained from any ranger, at any ranger station, and at the visitor centers at park headquarters and Cottonwood. Permits could also be requested by telephoning a ranger station or visitor center.

Day users would not have to register and could enter the backcountry and wilderness at any location. Backcountry boards would provide registration forms, park rules and regulations, a small map of the immediate area, and any special limits or interpretive messages.

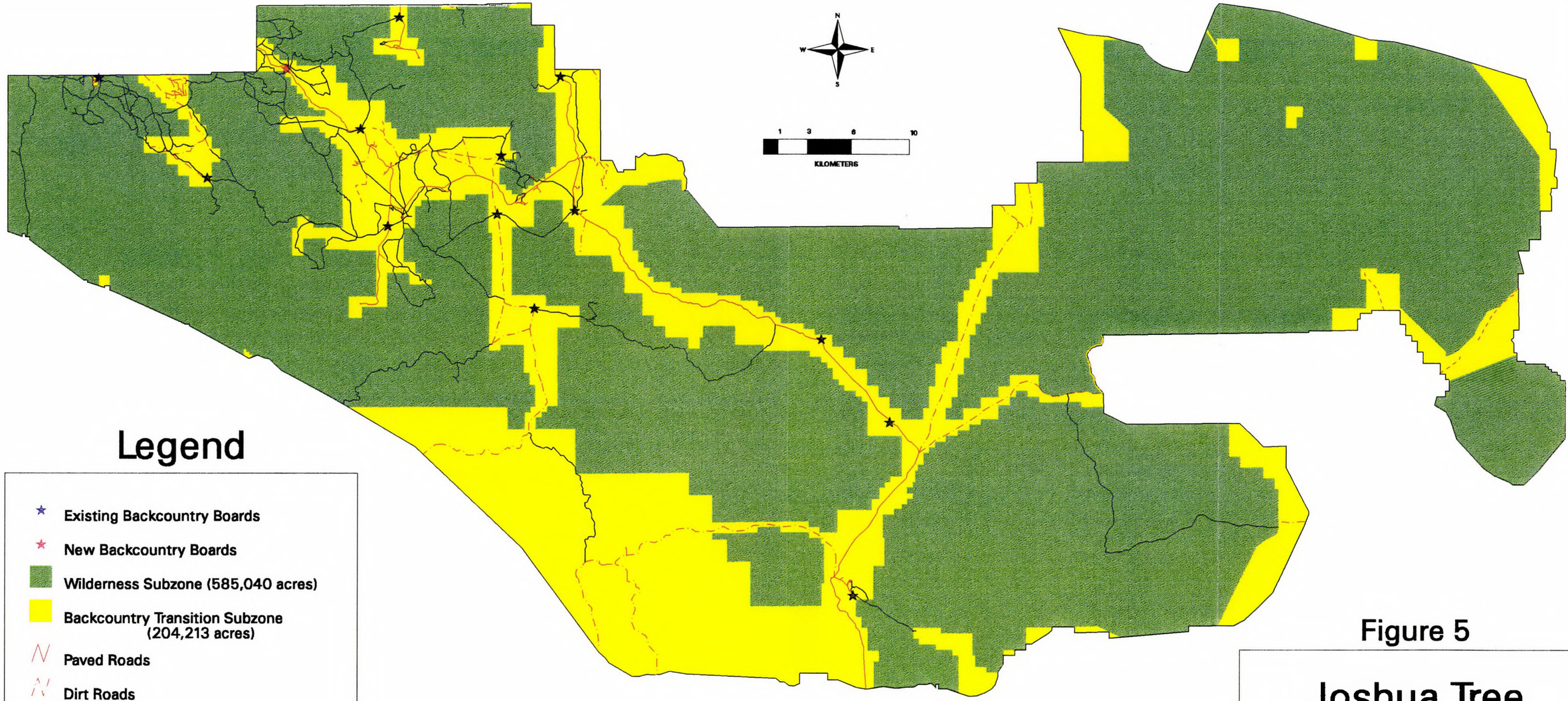
The new proposed action would designate many more miles of trails than were previously official. Casual or social trails not designated as part of the trail system would be restored to a natural condition. No new trail requests from the public would be considered until the trail network, including corridors, proposed in this plan is inventoried, developed, and monitored for several years. Monitoring of the trail network would become an on-going process. If, during the monitoring process, it was determined that resource damage or conflicts between user groups was occurring, the National Park Service would have the authority to either close trails and corridors or to reroute trails to mitigate the damage and prevent future resource and visitor experience degradation.

Hiking

Cross-country hiking would occur throughout the park except for Keys Ranch, which would be closed to unescorted visitors. Use of the trail system would be encouraged. Topographical maps, compasses, ample water, and survival gear would be recommended for travel off-trail.

Stock Use

Stock use would be limited to horses and mules and restricted to designated equestrian trails and corridors (see figure 6). At the discretion of the Superintendent, the use of llamas in the park could be studied in the future with the primary considerations being the protection of park resources and consistency with the National Park Service mission. Future studies would be considered only after a sufficient time has elapsed to allow for plan implementation and resource data collection.

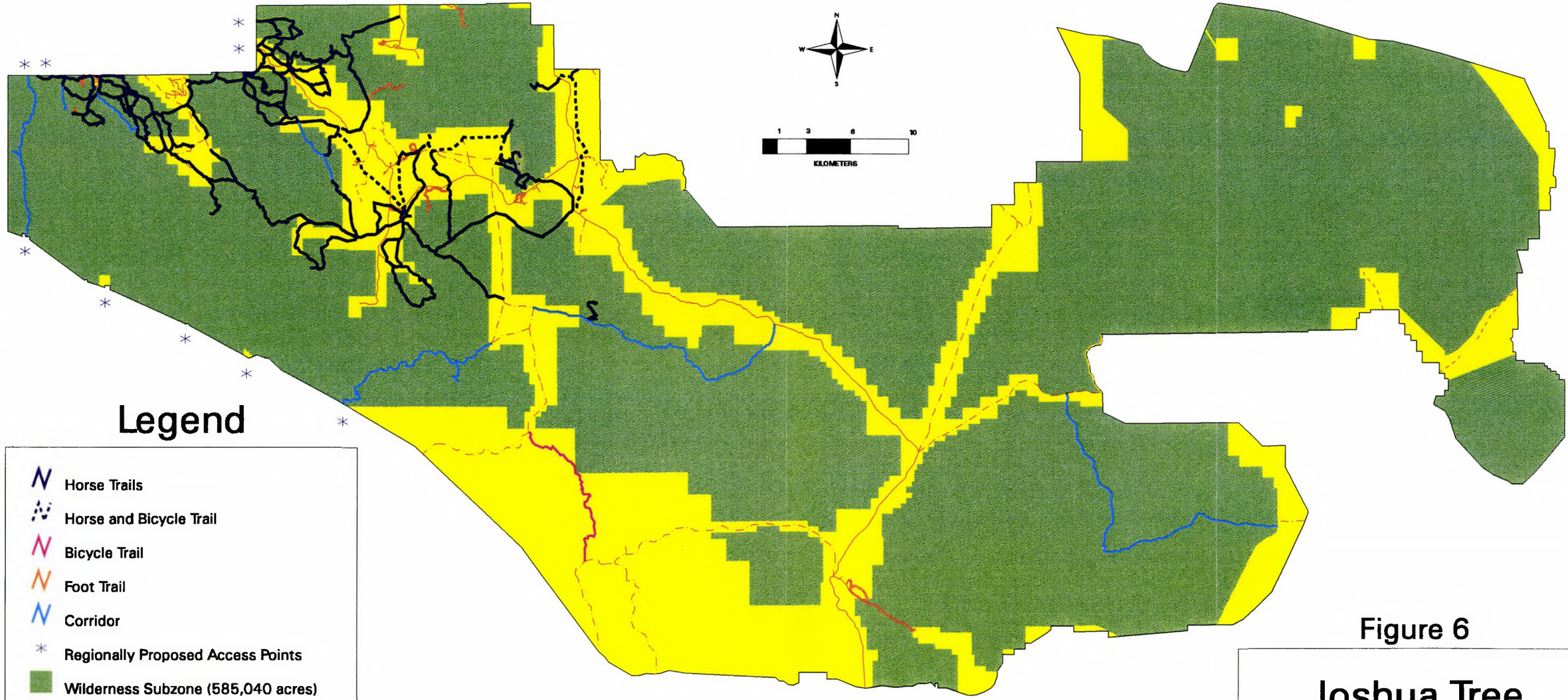


Legend

- Existing Backcountry Boards
- New Backcountry Boards
- Wilderness Subzone (585,040 acres)
- Backcountry Transition Subzone (204,213 acres)
- Paved Roads
- Dirt Roads
- Restricted Access Roads
- Trails and Corridors
- Park boundary

Figure 5

Joshua Tree National Park Backcountry Boards



Legend

- Horse Trails
- Horse and Bicycle Trail
- Bicycle Trail
- Foot Trail
- Corridor
- Regionally Proposed Access Points
- Wilderness Subzone (585,040 acres)
- Backcountry Transition Subzone (204,213 acres)
- Paved Roads
- Dirt Roads
- Restricted Access Roads

Figure 6

Joshua Tree National Park Trails and Corridors

Stock could use all dirt roads open to motor vehicles and the shoulders of paved roads. Stock would have to travel within the confines of the established trail tread and corridors. Resting or tethering of stock would not be allowed within 200 feet of any natural or artificial water source, including springs, seeps, wells, dams, and tanks.

Portions of Ryan and Black Rock Campgrounds would be designated as a day use staging area and as a frontcountry stock use camp. A new day use staging area would be created at the west entrance old borrow pit. The terminus of the Lower Covington Flat Road at the California Riding and Hiking Spur (mile 30) would be an equestrian parking area. This area was identified as the Lower Covington Flat picnic area in the *General Management Plan,* but no longer serves that purpose because an August 1995 fire destroyed the site. Other areas such as Indian Cove, Twin Tanks, Geology Tour Road, and North Entrance would continue to provide parking and access for horses. Numerous other parking areas could accommodate horse trailers and, provided that the trailers do not obstruct traffic, they would be permitted. Increases in visitor use could require additional parking areas for horse trailers.

Those trails previously used by equestrians, which are not designated as part of the trail system, would be closed and rehabilitated.

Bicycle Use

Bicycles would be allowed on all roads open to motor vehicles. In addition, approximately 29 miles of trails would be designated for bicycle use. Bicycles would be restricted to roads and designated bicycle trails as depicted in figure 6. With the exception of the Berdoo/Thermal Canyon Trail, the bicycle trails would be open to equestrian use. Caution on multiple-use trails would be recommended. A vehicle parking area could be established at the southern base of the Berdoo/Thermal Canyon Bicycle Trail to provide a staging point for loading/off loading of bicycles. The .5 miles of the Berdoo/Thermal Canyon Trail that currently lie within wilderness would be rerouted into the backcountry transition subzone. The .67-mile reroute in the backcountry transition subzone was surveyed in 1998 for desert tortoise habitat. One active burrow was located about 18 meters from the proposed route. An adult male tortoise was observed in the area.

Regional Trails and Access

The town of Yucca Valley has proposed a trail from La Contenta Road directly south to the park boundary that would become a part of the California Riding and Hiking Trail. A short section of trail to meet Yucca Valley's portion would be designated. The current trail, which continues two miles to the Black Rock Campground, would become the California Riding and Hiking Trail/Black Rock Spur.

Other regionally proposed access points (see figure 6) would include:

- Long Canyon north and south
- Wide Canyon
- Deception Canyon
- Fan Hill Canyon
- Pushawalla Canyon
- Black Rock area dirt road
- West entrance and BLM section

Long and Pushawalla Canyons would be designated as corridors. They would follow the canyon bottoms and would be unmaintained. The Black Rock area dirt roads would offer access by both horse and foot traffic into the network of trails in the area.

The BLM section north of the west entrance station would provide access to the network of trails in the vicinity. This would provide an opportunity for equestrians to access this area without staging at the borrow pit inside the west entrance.

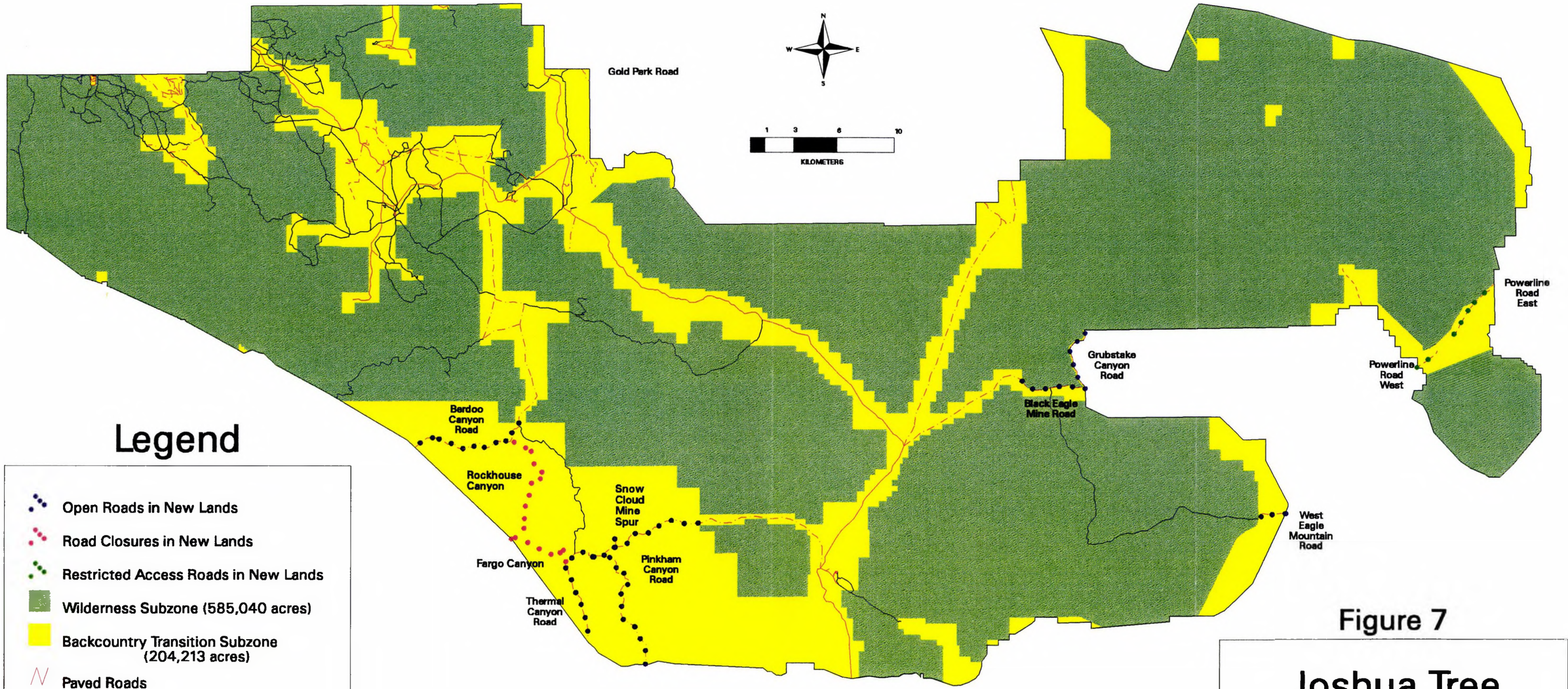
There would be no trails or corridors designated inside the park in the Wide, Deception and Fan Hill Canyon areas. Since no trails would exist, hiking would be cross country. Recreational opportunities could be limited, and development of parking areas and entry points would not be recommended.

In the future, there could be public interest in additional hiking access along the park boundary. As the adjacent land management agency or public entity secured public access up to the park boundary, the National Park Service would consider adding new trails to link the new access points. Each such addition not covered in this document would be considered in a separate environmental assessment.

Roads

This new proposed action would designate 37.7 miles of nine roads on the land added to the park in 1994 as open to the operation of motor vehicles. The roads, depicted in figure 7, are:

- Berdoo Canyon Road — 6.5 miles beginning at old monument boundary, west to new park boundary
- Pinkham Canyon Road — 12 miles beginning at old monument boundary, west and then south to new park boundary
- Thermal Canyon Road — 3.5 miles beginning in T5S, R9E, south to new park boundary
- connecting link from Pinkham Canyon Road to Thermal Canyon Road — 2.5 miles
- Black Eagle Mine Road — 3.2 miles beginning at old monument boundary easterly to the new boundary
- Grubstake Canyon Road — 3.3 miles beginning at the Black Eagle Mine Road north to the old monument boundary
- Powerline Roads (restricted access) east — 3.5 miles, and west — 1.2 miles, follows the 220-kv powerline that lies on a right-of-way issued to the MWD
- West Eagle Mountain aqueduct access road — 1.2 miles beginning at the eastern park boundary and traversing sections 36 and 35, T4S, R14E to its junction with the MWD West Eagle Mountain tunnel just south of the MWD Eagle Wash camp and dump area.
- Snow Cloud Mine Road - .8 miles from the Pinkham Canyon Road to the old Snow Cloud Mine.



Legend

- Open Roads in New Lands
- Road Closures in New Lands
- Restricted Access Roads in New Lands
- Wilderness Subzone (585,040 acres)
- Backcountry Transition Subzone (204,213 acres)
- Paved Roads
- Dirt Roads
- Restricted Access Roads
- Trails and Corridors
- Park boundary

Figure 7

Joshua Tree National Park Roads in New Lands

The new proposed action would not authorize public use of any portion of the above roads that cross privately or state-owned lands where such use would constitute trespass. The above roads lie in nonwilderness and the National Park Service could permit motor vehicles on them. The roads would be open only to registered motor vehicles that are legal to operate on the public roads of the State of California. This plan would not provide for the operation of off-road vehicles or California Green-Sticker Program vehicles anywhere in the park. In Joshua Tree National Park, the public could operate motor vehicles only on designated roads and parking lots. The operation of motor vehicles elsewhere in the park is prohibited by 36 CFR 4.10. National Park Service regulations preclude developing a special regulation that permits off-road vehicle use in the park on routes or areas other than roads.

This plan would afford a driving experience not found elsewhere in the park. The dirt roads are rough and require four-wheel drive vehicles. Limited maintenance would occur to keep the roads passable to four-wheel drive standards and to mitigate natural closures. The roads traverse gorges that are deeply incised into the Little San Bernardino and Eagle Mountains. The terrain is rugged and dry and has a quiet and austere beauty. These roads should not be driven without the proper vehicle, equipment, and preparation.

The roads designated as open would continue to be closed to commercial vehicles under 36 CFR 5.6(b), as are the roads designated as open to public use in the former national monument. The commercial vehicle prohibition would not apply to commercial vehicles that serve private concerns or interests in the park. Access by such commercial vehicles would be governed by permit under 36 CFR 5.6(c).

Some of the roads listed as open predate the park (1994) or monument (1936) and may be found to constitute rights of public highway under revised statute 2477. The National Park Service is authorized to regulate public use of the roads on park land.

All roads not designated as open would be closed and reclaimed as part of the natural zone. In concert with current desert wilderness management directives, restoration at Joshua Tree would use the "minimum requirements for administration" exception. This exception authorizes Federal land managers to employ temporary roads, use motor vehicles, and use motorized equipment only if such activities or uses are "...necessary to meet minimum requirements for the administration of the area for the purposes of the [Wilderness] Act."

Wilderness projects would consider appropriate restoration methods on a case-by-case basis. It would be the intent of these projects to restore wilderness qualities to these disturbed lands as well as to protect them from further destruction. Proven techniques for revegetation and reclamation would include: gathering seed from areas adjacent to disturbed sites, replanting sites with native vegetation, decompacting soil using tractors pulling a ripping bar, pitting soil with hand tools, and reducing erosion using weed-free mulching material. Any or all of these methods would be used to restore disturbed lands within the park.

Climbing Management

This plan would strive to prevent the cumulative impacts of climbing in Joshua Tree National Park from increasing to unacceptable levels and to mitigate impacts and restore areas that have been degraded by climbing activities. These goals would be achieved by assessing current conditions in the climbing environment by describing desired future conditions and by working with the climbing community and other interest groups to address any disparity between the existing conditions and the desired future conditions in all park areas.

This climbing management program would focus upon all aspects of the activity that could impact park resources. Creation of social trails, impacts to soil and vegetation at the base of climbs, degradation of scenic values due to chalk and fixed anchors, and impacts to the microhabitats, including flora and fauna found on rock surfaces, are some of the impacts of climbing.

Information necessary to complete an assessment of current conditions and for determining desired future conditions continues to be collected. The Council of Environmental Quality (CEQ) regulation (1502.2) provides for developing a plan when information is incomplete or unavailable. Initial scientific studies have been completed, such as the impacts of climbing on raptor nest site selection (Torab, 1997) and the impact of rock climbing on bird and plant diversity (Camp, 1995).

The National Park Service has taken other preliminary steps to obtain baseline information about resource impacts associated with climbing. Through surveys and sampling, the National Park Service is assessing current resource conditions in the climbing environment. These efforts focus upon areas affected by social trails and the flora and fauna that live in vertical ecosystems. Other efforts center upon determining to what extent fixed climbing anchors have been used in the developed zone, the backcountry transition subzone, and the wilderness subzone. These and other field data would be used to help make informed decisions about restrictions or other management responses.

Some of the specific numbers needed to quantify 1998 conditions were unknown at the time the Supplement was prepared. The National Park Service has, however, initiated steps to obtain baseline information to gauge what the 1998 impact levels were.

The National Park Service is currently conducting surveys, based upon stratified sampling methodology, that are being used to approximate the number of bolted routes present within Joshua Tree National Park. Preliminary data indicates that the number of bolted routes in Joshua Tree National Park is approximately 3,475 and the number of bolts is approximately 7,128. No carrying capacity has been established for any area of Joshua Tree National Park for the placement of bolted climbing anchors. Thus, the data on bolted routes would be useful both as a gauge of the different types of climbing experiences in the park and as an indicator of the potential for impacts.

The presence of bolts on a climb does not necessarily mean that the route or the area would be heavily impacted. Other factors, such as the climb's difficulty, relative degree of safety, ease of access, perceived quality by climbers, and proximity to other routes with similar qualities, are more important in determining a route's popularity and frequency of use. The most frequently visited climbs and climbing areas sustain higher levels of resource impacts.

In January 1999, the National Park Service also began a project designed to examine the impacts of social trails in heavily used climbing areas and to explore methods to mitigate those impacts. The project identifies high use areas that are heavily impacted by social trails and that would benefit from mitigation. The National Park Service installed vegetation plots to collect baseline information about vegetation diversity, richness, and density. Park staff and volunteers, working with input from the climbing community, delineated access trails. The project also inventories a species of concern, rock pennyroyal (*Monardella robisonii*), formerly listed as a Category 2 species.

Following the completion of the survey, formations would be periodically sampled to determine if overall numbers of fixed anchor impacts are remaining stable or are increasing. Additionally, baseline data about surface disturbances because of social trailing, disturbance to vertical communities, and impacted plant communities at the base of climbs would be periodically re-evaluated to ensure that impacts do not exceed 1998 levels in wilderness and desired future conditions throughout the park.

Management of climbing in Joshua Tree National Park would be supported by a description of the desired future conditions of the climbing environment. The National Park Service would work with the Climbing Committee to articulate these conditions and would consider the following criteria and other criteria that may be developed later:

- Integrity of natural processes,
- Condition of plant and wildlife communities,
- Condition of soils and surfaces,
- Visual appearance of rock formations,
- Density of climbing routes and bolts,
- Levels of climber visitation to different sites,
- Opportunities for new route exploration,
- Condition of fixed anchors on existing routes,
- Commitment of administrative resources,
- Level of awareness among park visitors of management objectives and strategies,
- Climber and non-climber expectations, and
- Impact mitigation needs and programs.

In general, this plan envisions that the desired future conditions of the climbing environment in Joshua Tree National Park would be improved in those areas where resource impacts are now significant. The plan would also maintain and, under some circumstances, reduce levels of climbing activity to ensure that all park values are preserved.

Climbing Committee

Alternative E recognizes that working with the public to manage this activity is essential. To that end, the National Park Service would establish a climbing committee under the auspices of the Joshua Tree National Park Advisory Commission, established by section 407 of the California Desert Protection Act, to function as a subcommittee of the Commission. The charter of the Joshua Tree National Park Advisory Commission provides for the creation of subcommittees from among its membership that can be supplemented, when appropriate, by members of the public. The Chair of the Commission, subject to the concurrence of the Designated Federal Officer (the park Superintendent), would determine the membership of the subcommittee.

A sitting member of the Advisory Commission would chair the Committee and representatives of the climbing community, conservation organizations, and other individuals would serve on the Committee. The Committee would function under the direction of and within the parameters established by the National Park Service to provide recommendations regarding the climbing management program.

The Climbing Committee would gather information and conduct research to make recommendations to the Advisory Commission. The Advisory Commission, in turn, would provide recommendations to the park Superintendent. The Climbing Committee would meet the requirements of the Federal Advisory Committee Act (PL 92-463) and its implementing regulations, 41 CFR 101-6.10. All meetings of the Committee would be announced to the public and would be open to the public. The Superintendent, however, remains the ultimate decision-making authority about climbing management in Joshua Tree National Park.

Existing Bolts (Fixed Anchors)

Existing bolts that are deemed unsafe by climbers can be replaced on a piece-by-piece basis without a permit within the park's developed zone and the backcountry transition and wilderness subzones. Existing bolts, which are identified by the National Park Service as infringing upon the wilderness experience of other visitors or wilderness character, should be camouflaged or removed by the climbing community. All bolt replacements and new bolt placements would be with neutral or rock-colored bolt hangers and chains.

Replacement of existing bolts would be accomplished in a manner that removes the old bolt with minimum damage to the rock resource. Whenever possible for the safe replacement of an existing bolt, the existing bolt hole would be used for the replacement bolt. If use of the existing hole is not possible, the old hole would be filled with a natural colored rock material blended with bonding agents to permanently fill the hole.

Power drills would be prohibited in wilderness. Use of power drills in non-wilderness areas would require authorization by the Superintendent under a special use permit.

New Bolts (Non-Wilderness)

The developed zone and the backcountry transition subzone contain the most heavily-visited climbing areas in Joshua Tree National Park. The National Park Service is completing surveys of climbing impact, including the approximate number of bolted routes, in these areas. After this data is gathered, rock formations would be sampled periodically to determine if overall levels of impact, including those related to bolts, are stable or increasing. Additionally, baseline data about surface disturbances due to social trails, disturbance to vertical biotic communities, and impacts to plant communities at the base of climbs would be periodically evaluated to determine if these impacts are within acceptable levels.

Placement of new fixed anchors in the developed zone and backcountry transition subzone would be allowed, except where explicitly prohibited, under an established monitored process that requires climbers to report their intent to place new bolts to the National Park Service. The National Park Service, working with the Climbing Committee, would establish a process for monitoring the placement of new bolts. This process would promote climber education and self-

regulation. The National Park Service would complete the inventory of climbing impacts within one year of the adoption of this plan and would identify areas where additional bolts would conflict with other park values or management objectives.

Under the monitored process, new bolted routes in the developed zone and the backcountry transition subzone would not require a permit, but the climber wishing to place additional bolts must complete a checklist of criteria that would be developed by the Climbing Committee. The checklist would require the climber to consider the potential impacts of new bolts on park resources and the experience of other visitors. A positive response to each of the criteria to be evaluated in the checklist would be considered implied approval for placing new fixed anchors. In essence, this is an honor system and would encourage climber investment in park management objectives and priorities.

This checklist would be picked up and, once completed, dropped off at any entrance station, the visitor center, or with a National Park Service employee. It would be forwarded to the Climbing Committee. The Climbing Committee would work with the National Park Service to monitor the rate and locations of new fixed anchor placements to ensure that impacts do not reach unacceptable levels.

While the National Park Service completes the inventory of climbing impacts, there would be a 1-year period during which a permit would be required before new bolts could be placed in the developed zone and the backcountry transition subzone. During this interim period, proposals for new bolted routes would be submitted to the park Superintendent, who would work with the Climbing Committee to evaluate them based upon the criteria developed for the checklist. As part of a proposal to place new bolts during this interim period, the climber would also complete and submit the checklist, which would verify that all criteria for new bolt placements are adhered to.

Following the 1-year interim period, the National Park Service and the Climbing Committee would assess the resource impacts that are related to existing bolted routes. This information would be used to establish an acceptable rate of expansion for new bolted routes, as well as any formal process by which new routes would be approved.

Some of the basic principles for placement of new bolts under the proposed monitored process would include:

- Only a limited number of new bolted climbing routes per year would be allowed.
- The National Park Service would determine a new route bolt "cap." The new route cap could vary from one year to the next, but should always reflect the commitment to keep the cumulative impacts of climbing in the park to acceptable levels.
- The route would not have the potential to lead to significant resource impacts.
- The route would not impact the experience of other visitors.
- The route would be an independent line, a suitable distance from existing routes, or a variation to an existing line that provides an exceptional climbing experience.

The National Park Service would monitor the level of new route and bolt activity in the developed zone and backcountry transition subzone. If the potential for resource degradation would become unacceptable, different management actions would be necessary.

Bolted routes in the developed zone and the backcountry transition subzone would be evaluated to identify areas where existing fixed anchors have resulted in unacceptable impacts to resources and/or the visitor experience. High densities of bolts and trampling of vegetation at the base of climbs require management prescriptions. These prescriptions would include, but not be limited to, relocation of specific bolts, relocation of approach and descent routes, permanent or temporary closures, etc.

New Bolts (Within Wilderness)

Under the 1964 Wilderness Act, wilderness is a landscape where the imprint of man is "substantially unnoticeable," and where natural processes can operate freely. Wilderness is an area that retains its primeval character and provides outstanding opportunities for solitude or a primitive and unconfined type of recreation. Man's imprint remains substantially unnoticeable. The National Park Service is required by law to preserve the character and many natural and social values of Joshua Tree National Park's designated wilderness.

The Wilderness Act provides a major exception to seven of the nine prohibitions listed "...to meet the minimum requirements for the administration of the area for the purpose of this Act." Thus, the permanent installation of bolts in wilderness may be considered an exception to the prohibition of installations in wilderness if the bolts contribute to the administration of the area for the purpose of wilderness. Trails through wilderness can provide for user safety and confine impacts to defined areas as they provide access through wilderness and provide for the enjoyment of wilderness itself. The installation of bolts can provide for climber safety, limit impacts, and provide access to climbs of exceptional quality that enhance the user's ability to experience a primitive and unconfined type of climbing experience.

This plan aims to keep the cumulative impacts of rock climbing in Joshua Tree wilderness at or below 1998 levels. Research projects initiated in 1999 would continue to be conducted to determine current levels of social trails, impacts on vegetation and wildlife, and the presence of bolts in park wilderness.

There are many climbing routes already established in the park's wilderness. The number of bolted routes in wilderness alone is less important than the cumulative levels of resource impact associated with climbing those routes. However, wilderness is a finite resource, and continued unregulated placement of bolts in Joshua Tree National Park's wilderness is unsustainable.

The National Park Service must approve and issue a permit for new bolted routes in wilderness. The National Park Service would determine if additional routes that require fixed anchors were justified. The National Park Service would work with the Climbing Committee to more formally describe the criteria, which must be satisfied, before a new bolted route can be approved and a permit issued.

Climbers wishing to establish new bolted routes in wilderness would present an application to the Climbing Committee, which would review and make a recommendation for the Advisory Commission to submit to the Superintendent for approval or denial. Park staff would review the proposal for consistency with other management objectives and would ascertain that the new route would not conflict with sensitive resources and the preservation of wilderness character. Most importantly, the proposal would be evaluated in terms of its potential to increase or reduce the cumulative impacts of climbing in the wilderness. If all the relevant criteria were satisfied, the Superintendent would issue a permit for the new route. While the Climbing Committee would

play an important role in reviewing proposed new routes, the National Park Service would retain the sole responsibility for issuing permits.

Before issuing a permit, the National Park Service would review any new route proposal to determine:

- that the proposed route would have the potential to enhance the user's ability to experience a primitive and unconfined type of climbing experience that is consistent with an encounter with wilderness,
- that the proposed route would not have potential to lead to resource impacts,
- that the proposed route would not conflict with the protection of wilderness values,
- that the proposed route would have minimal impact on the experience of other wilderness visitors, and
- that the proposed route would be an independent line, suitably distant from existing routes, or a variation to an existing line that provides an exceptional climbing experience.

These and any additional criteria would have to be met prior to approving the placement of new fixed anchors.

Existing bolted routes would not necessarily have to be removed before additional bolted routes could be established in Joshua Tree National Park wilderness. No new bolted routes, however, would be permitted if they would increase the cumulative levels of impacts to the wilderness resource beyond those estimated for 1998. A "cap" on the number of bolted routes that may be placed in wilderness during any year would be established and reviewed annually. The National Park Service would work with the Climbing Committee to determine what this cap should be from year to year, but under all circumstances the goal would be to protect park resources and values.

The National Park Service could authorize placement of new fixed anchors not associated with a new route to reduce other climbing impacts and/or to address climber safety issues. Such proposed placements, initiated by the climbing community, should be submitted to the Climbing Committee.

No new routes requiring fixed anchors should be permitted within the "Fixed Anchor Free Zone" (see Fixed Anchor Free Zone section).

In conjunction with the Climbing Committee, the National Park Service would evaluate all bolted climbing routes in the wilderness for appropriateness and for impacts to the resource and wilderness experience. Fixed anchors determined to be highly visible, too close to sensitive resources, or in other ways degrade the wilderness experience, would be camouflaged or removed. Replacement of all visually intrusive belay/rappel anchors (slings, webbing) would be made using neutral or rock-colored anchors.

Access Trails

The lack of designated trails to provide access to climbing areas from parking locations to rock faces has resulted in a network of "social trails." The National Park Service would formalize a process to inventory social trails, designate the minimum number of trails needed to access climbing areas, place physical barriers and signs to protect sensitive resources, etc.

Base of Climbs

Areas at the base of climbs also receive intensive use and have degraded soil and vegetation resources. The National Park Service would survey the base of popular climbs to evaluate any restoration, protection, or additional management actions that may be needed.

Chalk

The use of gymnast's chalk has degraded some of the park's scenic resources. In some locations, these markings disrupt the natural patterns of rock and lichen. Although chalk marks in most locations are rinsed off by rain part of the year, some chalk deposits persist, especially under overhangs and on the most popular routes. The National Park Service, with the Climbing Committee, would work with climbers to coordinate voluntary chalk clean-ups and develop protocols for using chalk.

Fixed Anchor Free Zone

This zone would preserve some areas of the park as completely unaffected by the presence of fixed anchors. No type of fixed climbing anchor would be placed. All existing fixed anchors in these areas would be removed. The National Park Service would work with the Climbing Committee to develop a timetable to remove fixed anchors and to publicize the restrictions on climbing in this zone.

When evaluating an area for designation as a fixed anchor free zone, the following would be considered:

- benefits to visitor experience,
- protection of natural, cultural, and scientific resources,
- popularity and historic use of the area to climbers,
- concentration of established routes in the area and potential for new route exploration,
- uniqueness of the rock formations,
- sensitivity of resources, and
- conflicts with other user groups.

Fixed anchor free zones would include the Coxcomb Mountains; the Little San Bernardino Mountains (excluding that portion of the range directly east of Covington Flat); the Hexie Mountains (excluding the Stirrup Tank area); the Cottonwood area and other areas east of the Pinto Basin Road; the Pinto Mountains (excluding the areas around Belle and White Tank Campgrounds); and rock formations which form the corridor along the Nature Trail providing access from the parking lot to Barker Dam (not including the major formations that are merely visible from Barker Dam Nature Trail)(figure 8).

Other Climbing Management Guidelines

Closures in certain areas could be enacted to protect threatened or endangered species, nesting birds, cultural resources, and vegetation. Climbing would not be permitted within 50 feet of any prehistoric or historic rock art site or other cultural resource. Removing vegetation from

cracks (route cleaning) would be prohibited. The chipping and gluing of new holds would be prohibited.

Using the park is not a risk-free experience. The National Park Service cannot guarantee the safety of park users. The National Park Service would not maintain any climbing routes or associated climbing hardware and software nor would it provide supervision or climbing instruction. The National Park Service would not assume responsibility for the condition of climbing terrain, routes, nor the acts or omissions of climbers. The National Park Service explicitly disclaims all responsibility for the safety of equipment, bolts or anchor systems in the park.

Climbing exclosures could be created in which climbing would be excluded to provide a control area for the study of the climbing impacts. Authority for closures is granted in 36 CFR 1.5. Incidental business permits would not be issued for commercial climbing groups in some areas to protect visitor experience, resources, or both.

Automobile Camping

Automobile camping would be allowed only in designated campgrounds identified in the *General Management Plan,* all of which are in the developed zone of the former monument. No new campgrounds would be constructed on the land added to the park in 1994. The National Park Service has the option to initiate a study in the form of an environmental assessment for an additional 4-wheel/primitive camp in the new lands in the Little San Bernardino Mountains. Automobile camping would not be allowed along dirt roads. The land added in 1994 would be managed in the same way and to the same standards as the land in the former monument.

Group Sizes for Backcountry Camping

Because there are different expectations for day and overnight use, limits would be imposed on the size of groups that enter the natural zone only for overnight use. The group size limit in the backcountry transition subzone would be 25 and the wilderness subzone would be 12. The Superintendent would retain the discretion to adjust numbers based upon impacts to the resources or special needs. The Superintendent would also retain the discretion to monitor day use and to establish group size limits for day use.

Backcountry overnight group camping would be permitted anywhere in the backcountry transition and wilderness subzones that is otherwise open to the public and that is more than 1 mile from an open road and 500 feet from a designated trail or a natural water source. The new proposed action would not subdivide the backcountry transition and wilderness subzones into smaller zones or impose limits on the number of parties permitted in each subdivision at any one time.

Commercial Services and Overnight Use

Alternative E would continue to authorize issuance of incidental business permits for guide services (hiking, climbing, equestrian, nature experience) for the wilderness subzone. The Wilderness Act, section 4(c), prohibits commercial enterprises in wilderness, but section 4(d)(6), permits commercial services to the extent necessary for activities that are considered proper for

realizing recreational or other wilderness purposes of the wilderness. Commercial guiding services fit the description of section 4(d)(6). The Wilderness Act provides no exceptions under which commercial services could engage in activities specifically prohibited by section 4(c) of the Wilderness Act, such as building roads or structures or using motor vehicles.

The group size limits proposed would also apply to incidental business permittees. If a permittee proposes to camp in a zone with a group larger than permitted for that zone, the permit would specify that the large group would be divided into smaller groups to meet the limits. Such smaller groups would have to camp at least 1 mile apart.

Area Closures

Restrictions on overnight use in the backcountry transition and wilderness subzones for the following areas would be as follows (see figure 9):

Cultural Sites — Keys Ranch (640 acres), Lost Horse Mine Site (80 acres)

Water Sources — Lost Palms and Munsen Canyons (3,840 acres), Buzzard Springs (2,640 acres), Rattlesnake Spring (2,640 acres), Smith Water Canyon (1,280 acres), Coxcomb Adit (2,640 acres), Stubbe Springs (5,120 acres)

Land Areas — Wonderland of Rocks (30,053 acres), Pushawalla (7,680 acres)

Most of these restrictions would protect areas important to bighorn sheep lambing and watering. They would also prevent impacts associated with overnight camping. The Keys Ranch site would be closed to the public except when accompanied by a National Park Service guide. The areas that are closed to overnight use would comprise 56,613 acres, or 7 percent of the park.

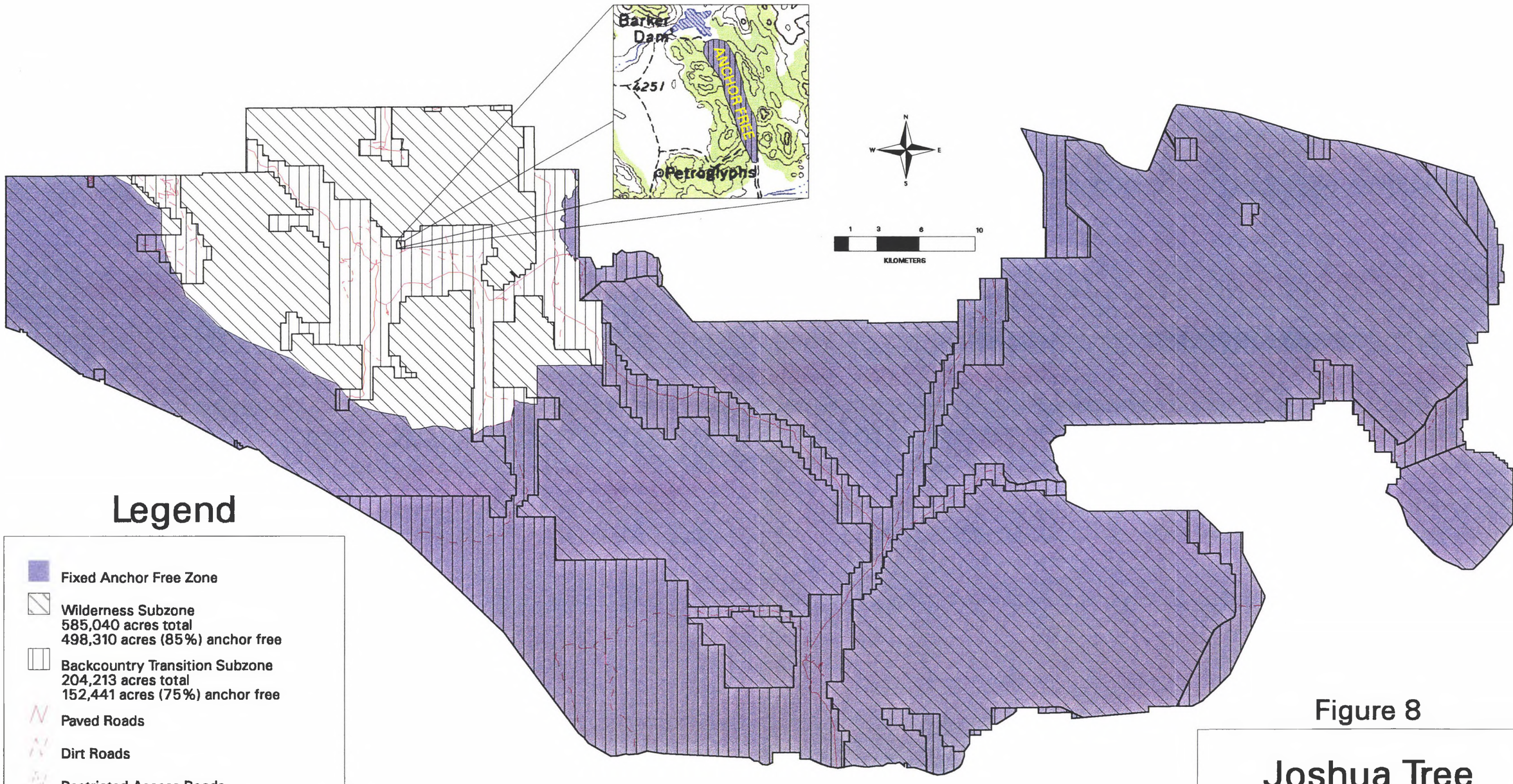
RESOURCES MANAGEMENT

Artificial Water Sources

Four major artificial water sources in the park were installed primarily for the benefit of bighorn sheep (*Ovis canadensis nelsonii*). Those water sources, Pine City, Russi's Rocks, Coxcomb, and Pushawalla (also known as Pinto Wells, not to be confused with the MWD Pinto Well), are shown in figure 10. Russi's Rocks and Coxcomb were constructed on BLM nonwilderness land before 1986. The National Park Service constructed the Pine City guzzler in 1970 and the Pushawalla guzzler in 1978.

All four of the artificial water sources are now in legislative wilderness (Pine City, Russi's Rocks and Coxcomb) or potential wilderness (Pushawalla). A determination must be made

- if there is a policy justification for habitat manipulation in the park,
- if wildlife has developed a dependency upon these guzzlers, and
- if there could be an exception to Wilderness Act prohibitions on structures and installations for the artificial water sources.

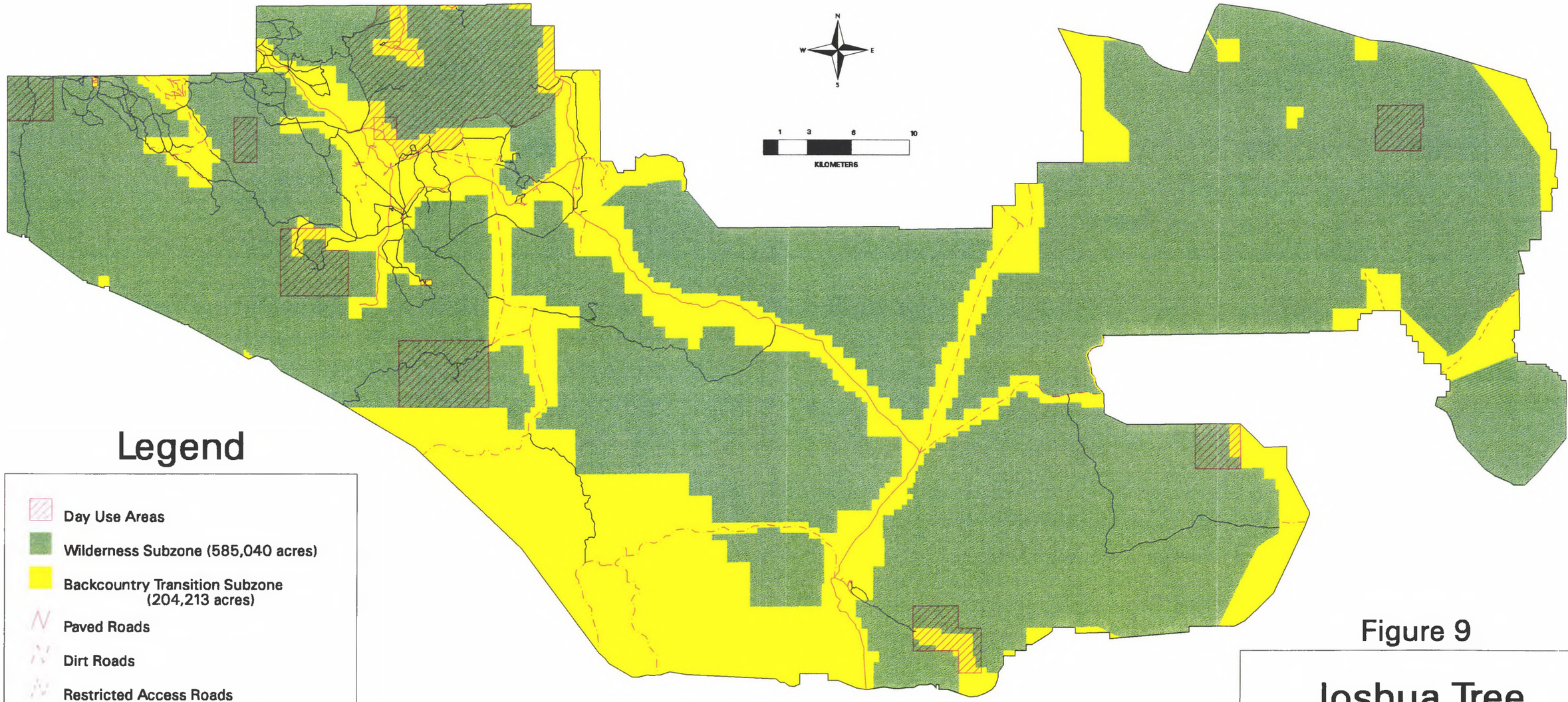


Legend

- Fixed Anchor Free Zone
- Wilderness Subzone
  585,040 acres total
  498,310 acres (85%) anchor free
- Backcountry Transition Subzone
  204,213 acres total
  152,441 acres (75%) anchor free
- Paved Roads
- Dirt Roads
- Restricted Access Roads

Figure 8

Joshua Tree National Park Fixed Anchor Free Zones

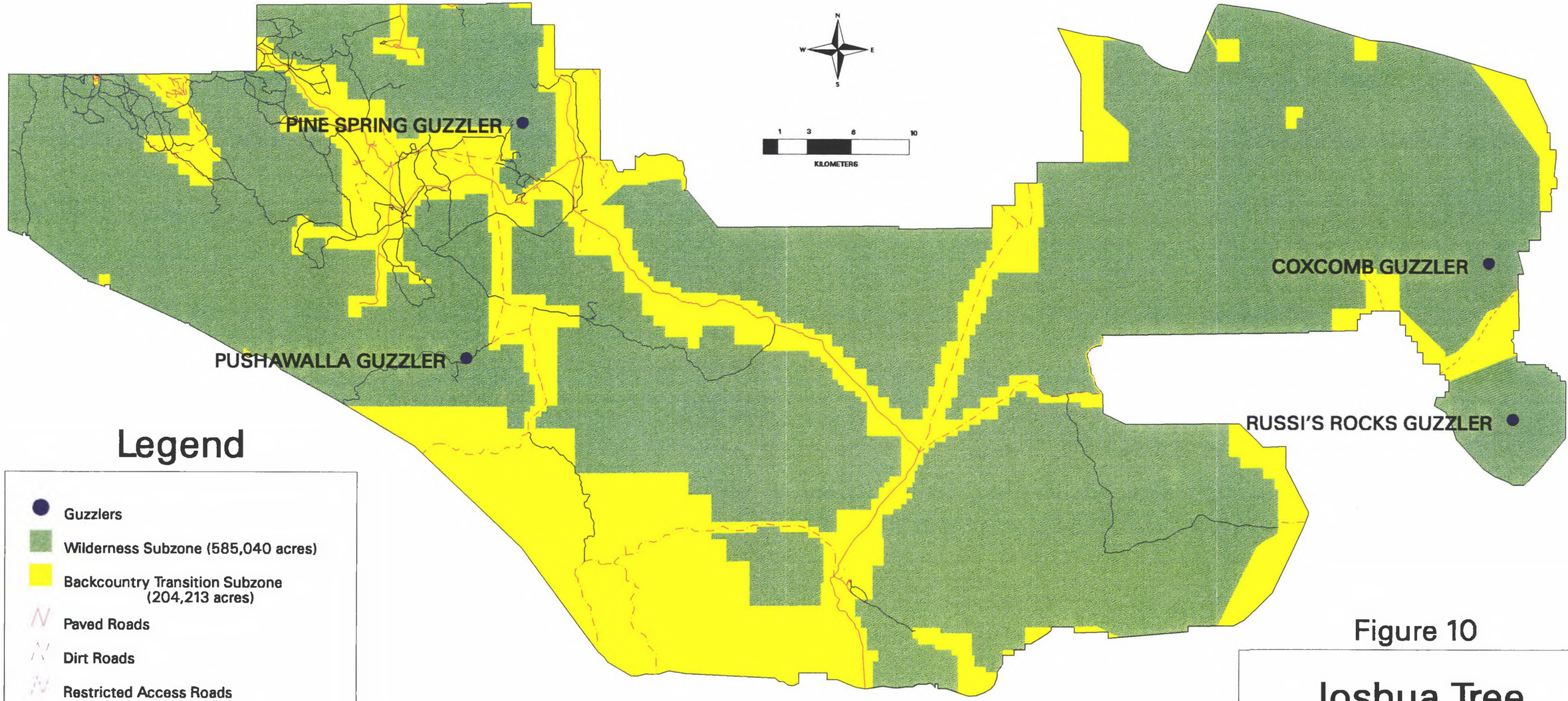


Legend

- Day Use Areas
- Wilderness Subzone (585,040 acres)
- Backcountry Transition Subzone (204,213 acres)
- Paved Roads
- Dirt Roads
- Restricted Access Roads
- Trails and Corridors
- Park boundary

Figure 9

Joshua Tree National Park Day Use Areas



Legend

- Guzzlers
- Wilderness Subzone (585,040 acres)
- Backcountry Transition Subzone (204,213 acres)
- Paved Roads
- Dirt Roads
- Restricted Access Roads
- Trails and Corridors
- Park boundary

Figure 10

Joshua Tree National Park Artificial Water Sources

Habitat Manipulation

National Park Service (NPS-77) policies on animal management direct that "natural processes would be relied upon to control populations of native species to the greatest extent possible." Artificial water sources are a form of habitat manipulation. In desert ecosystems, water is a crucial limiting factor to populations. As a general rule, habitat manipulation for management of native animals is permitted if the species are federally listed as threatened or endangered species, which the desert bighorn sheep is not. Habitat manipulation is also allowed to restore disturbed or altered habitat.

The new proposed action recommends that each functioning, artificial water source in the park be examined to determine if it supports bighorn sheep and if bighorn populations have become dependent upon it. The examination would also determine if the artificial water source were replacing a natural source within the park that has been disturbed or altered by human activities inside or outside the park.

The National Park Service could allow the continued existence of currently functioning artificial water sources if such a source is documented in the resource management plan as necessary to maintain or increase a Federally-listed threatened or endangered species or could help to prevent a species of concern, such as the desert bighorn sheep, from declining below a stable population. The National Park Service could also allow such water sources if they simulate a natural feature, such as a spring or a seep, or a natural process that has been altered or destroyed by human activities, including mining, water pumping, road construction, or fencing, etc.; otherwise, the source could be removed.

None of the sources qualify for the List of Classified Structures. None are on the National Register of Historic Places nor are they eligible for listing.

Wilderness

The maintenance of wild and self-sustaining populations of native animals and plants is part of the National Park Service mission, both under the Organic Act of 1916 and under the Wilderness Act of 1964.

Section 4(c) of the Wilderness Act prohibits, among other things, the placement of structures or installations in wilderness areas. Artificial water sources, with pipes, tanks, and associated facilities, constitute structures or installations, but the Wilderness Act allows an exception to the prohibitions of section 4(c) "as necessary to meet minimum requirements for the administration of the area for the purpose of" the Wilderness Act. Under this minimum requirement exception, the Federal land management agency may engage in otherwise prohibited activities.

The original proposed language for the Joshua Tree National Monument wilderness gave the Secretary authority "...to construct and maintain wildlife watering devices" in the wilderness. Congress chose not to enact this language when it created the Joshua Tree wilderness in 1976. The California Desert Protection Act waived the Wilderness Act prohibitions to make an exception for wildlife management in the BLM-administered wilderness areas (section 103[f]), but the act did not provide a similar waiver for the National Park Service-administered wilderness. Since no other statutory exemptions apply, the only applicable exception to wildlife watering devices in wilderness in the park must be the minimum requirement test of section

4(c). This test would be applied to all four artificial water sources. Water sources that pass the test could remain; those that fail should be considered for removal.

Because a central purpose in administering wilderness is to maintain wild populations of native animals, the minimum requirement exception would be used to allow the continued existence, installation, and servicing of artificial water sources, but only if such sources are deemed necessary.

All four major artificial water sources would be examined to determine if they meet National Park Service policy on habitat manipulation for native animal species dependency upon guzzlers and the minimum requirement for administration of wilderness. The determination of the period of study and scope of the analysis would be made by National Park Service biologists in consultation with other Federal and state agencies. The artificial water sources may remain in place and may continue to be maintained through the course of the study. Exceptions for camping for volunteers maintaining the Pushawalla and Pine City guzzlers, which lie within day use only areas, would be made on a case-by-base basis. Access to the guzzlers must meet the requirements of the Wilderness Act.

Other water sources constructed in the park have either been removed or are no longer functional. A water source was installed at Stubbe Spring (not in wilderness) in 1968 and removed in 1992/1993. A water source was installed in wilderness in 1970 at Rattlesnake Spring in the far northwest corner of the park. The source is no longer functional.

The BLM installed two small game/bird water sources on land that was not incorporated into the park until the 1950 boundary revisions. The sources are B-36 (T4S, R9E, section 3) east of Berdoo Canyon Road and B-37 (T3S, R6E, section 6) between east and west Wide Canyons. Both are in wilderness and no maintenance or inspection has been conducted for at least 20 years. What remains of these sites would be removed as time permits.

Desert Tortoise Recovery

On June 28, 1994, the U.S. Fish and Wildlife Service (FWS) adopted a recovery plan for the Mojave population of the desert tortoise. The recovery plan recommended that Federal land management agencies designate desert wildlife management areas in which "...some human activities must be restricted." The recovery plan further recommends the kind of activities that "should be prohibited...because they are generally incompatible with desert tortoise recovery" (*Recovery Plan* 1994).

The new proposed action implements the *Desert Tortoise Recovery Plan* by immediately designating all of the natural zone of Joshua Tree National Park as a desert wildlife management area (DWMA) and adopting the management recommendations for DWMAs in the recovery plan, except for fencing.

National Park Service regulations prohibit all but one of the activities (competitive organized events on designated roads) that the *Desert Tortoise Recovery Plan* describes as incompatible. The list of incompatible activities includes:

- all vehicle use off designated roads,
- competitive organized events on designated roads,
- habitat-destroying military maneuvers,

- clearing for agriculture,
- creation of landfills,
- surface disturbance that diminishes capacity of the land to support tortoises, other wildlife, or vegetation in all areas of the park except the developed zone,
- domestic livestock grazing,
- grazing by feral horses and burros,
- vegetation harvest, except by permit,
- collection of biological specimens, except by permit,
- dumping and littering,
- deposition of captive or displaced tortoises except under authorized translocation research permits,
- uncontrolled dogs,
- discharge of firearms, and
- hunting.

The National Park Service would not approve requests under 36 CFR 2.50 for organized motor vehicle racing or timed events. Such events do not meet the standards of 36 CFR 2.50(a). There is no recent record of a request for this activity so the restriction does not affect established uses within the park.

Alternative E would permit organized motor vehicle events that are not competitive or timed, such as motor home caravans, vintage car tours, or group motorcycle tours. The size of such organized noncompetitive events, however, would be a maximum of 50 vehicles; speeds would not exceed the posted speed limits. Prior to National Park Service authorization of such an event, consultation with the FWS as required by 50 CFR part 402 would be completed.

The National Park Service has established speed limits on all of the roads in the former monument under 36 CFR 4.21. The maximum speed limit is 45 miles per hour for paved roads and 25 miles per hour for unpaved roads.

The Distinction between Designated Wildlife Management Areas and Critical Habitat

On February 8, 1994, the FWS published a final rule to designate habitat critical to the desert tortoise. Critical habitat is defined in the Endangered Species Act as "specific areas within the geographic area occupied by the species...on which are found those physical or biological features essential to the conservation of the species and which may require special management considerations or protection." Critical habitat is protected under section 7 of the Endangered Species Act, which requires consultation for actions carried out, funded, or authorized by a Federal agency. Designating critical habitat does not create a management plan and does not prescribe specific management actions for the lands designated.

The critical habitat designation of 1994 did not designate any land in Joshua Tree National Monument as critical habitat. The FWS explained that the "...current management policies of...Joshua Tree National Monument provide adequate protection against potential habitat-altering activities because" the monument is primarily managed as a natural ecosystem (59 *Federal Register* 5825). Although the former Joshua Tree National Monument is not formally designated critical habitat, the FWS found that the monument was essential to the conservation of the species and should be considered in the development of recovery areas.

The FWS did designate critical habitat on BLM land adjacent to the former monument. Portions of that critical habitat were added to the park in October 1994 through the California Desert Protection Act. The Pinto Mountain critical habitat is almost entirely in the park as is a significant portion of the Chuckwalla critical habitat (figure 11).

Designation of critical habitat does not carry out the recommendations of the *Desert Tortoise Recovery Plan.* The land management agency is responsible for implementing the *Recovery Plan.* The key recommendation of the *Recovery Plan* for Joshua Tree National Park is the designation of designated wildlife management areas. The *Recovery Plan* states "...designation of critical habitat does provide protection of desert tortoise habitat until such time as the *Desert Tortoise Recovery Plan* is implemented and DWMA management is employed." The *Recovery Plan* recommended constructing tortoise fencing along roads, in particular, the road from Cottonwood north through the park. The *Recovery Plan* further stated, "If fencing is not permitted within the Monument, expand the boundary of the DWMA to the boundary of the Monument." This *Backcountry and Wilderness Management Plan* implements the *Desert Tortoise Recovery Plan* and designates the natural zone of the park as designated wildlife management area.

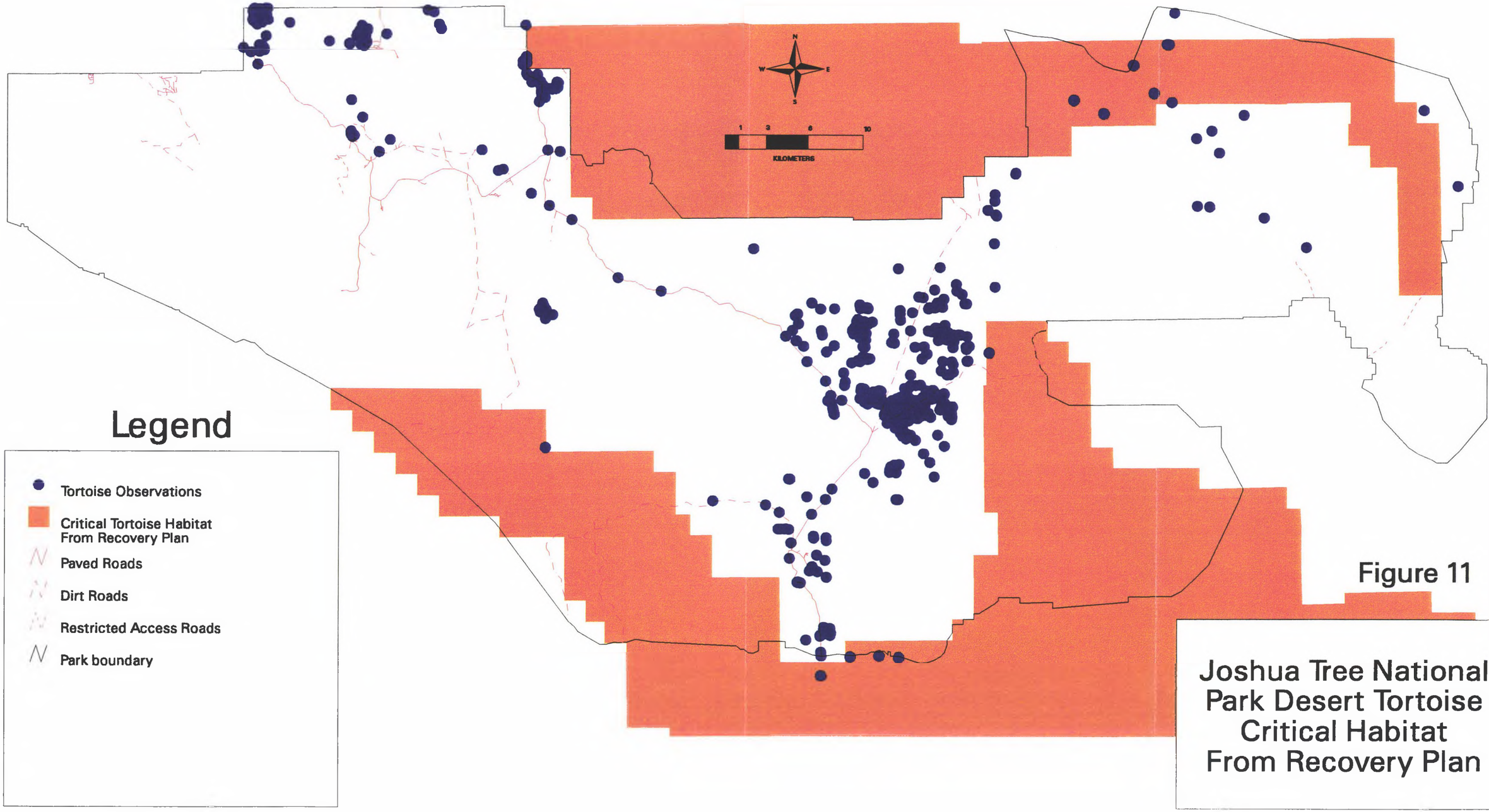


Figure 11

Joshua Tree National Park Desert Tortoise Critical Habitat From Recovery Plan

OLD PROPOSED ACTION (Alternative A)

GENERAL DESCRIPTION

Alternative A served as the National Park Service's initial preferred alternative. It was developed to minimize disturbance to resources and ensure their preservation unimpaired but still afford the public a broad spectrum of recreational enjoyment. After the lengthy public review and comment process, thorough review of the comments and consideration of the Joshua Tree National Park Advisory Commission's input, the National Park Service determined that the changes warranted the development of a new proposed action (alternative E), which will serve as the *Backcountry and Wilderness Management Plan.*

MANAGEMENT ZONING

Management zoning determines how specific areas in the park are to be managed to protect resources and provide for visitor enjoyment. The National Park Service establishes zones in parks in four classifications — natural, historic, developed, and special use. Within each of these zones, subzones can be designated to allow for particular management needs. The 1995 *General Management Plan* zoned the land in what was then Joshua Tree National Monument.

Alternative A would alter the zoning of the *General Management Plan* in one minor way. It rezones the Gold Park Road corridor (0.5 miles long and 60 feet wide) from the natural environment subzone to the developed zone.

ZONING OF THE 1994 ADDITIONS

The National Park Service evaluated each area added in 1994 to determine its contributions to the preservation of natural and cultural resources and wilderness. Management zones were then designated for each area. The management zones include:

Natural Zone (232,664 acres)

Preservation of natural resources and of the natural processes that shape such resources are primary in the natural zone; only uses that have no adverse effects are permitted.

Natural Environment Subzone (or Backcountry Transition) (100,884 acres)

The natural environment subzone, or backcountry transition subzone, is land zoned for the conservation of natural resources and processes, but the land is not legislatively designated as wilderness. In this subzone, the National Park Service could construct or operate minor facilities such as patrol stations or toilets, operate motor vehicles, land aircraft, and engage in other activities that are prohibited in wilderness. However, since this subzone is also intended to preserve natural resources, any proposed development would have to be minor. Recreational activities that are prohibited in wilderness, such as bicycle riding on trails, could be permitted.

Wilderness Subzone (131,780 acres)

The strictest preservation standards govern this subzone. The land in this zone is managed for the preservation of wildness and its undeveloped and primeval character and influence.

Developed Zone (375 acres)

This zone provides for the existence and maintenance of facilities to serve visitors. For the land added to the park in 1994, the developed zone consists exclusively of roads and possible parking areas along roads. Alternative A proposes no other developments on any of the land added to the park in 1994.

Alternative A proposes that 36.9 miles of unpaved roads would be designated open to public use. However, 4.7 miles of those roads lie within the special use zone, on a MWD right-of-way (LA-052057) for a 220-kv powerline in the Coxcomb Mountains. Since those acres are calculated in the special use zone, they are not included in the developed zone. The developed zone acres are calculated by multiplying the length of the unpaved roads in nonwilderness (28.9 miles) by a 100-foot-wide corridor and the length of one dirt road in wilderness (3.3 miles) by a 60-foot corridor.

Special Use Zone (961 acres)

The special use zone includes land that the National Park Service expects will continue to be used for activities not generally appropriate in parks but that have received special authorization.

Special use zones accommodate circumstances where Congress has directly provided for activities that are otherwise incompatible with resource preservation and visitor enjoyment. The MWD owns the only special use zone in the new areas of Joshua Tree National Park. The zone also includes land that the MWD does not own, but on which it has a Boulder Canyon Project Act (1928) right-of-way containing a 220-kv powerline (approximately 150 acres).

MWD land, obtained under the authority of a 1932 act of Congress, and rights-of-way obtained under the Boulder Canyon Project Act of 1928 are specifically protected by the California Desert Protection Act, section 406. Section 406 states that the incorporation of MWD fee lands into Joshua Tree National Park would not terminate the fee title to the MWD land. The law states:

> "Nothing in this title shall have the effect of terminating any validly issued right-of-way...granted or permitted to the Metropolitan Water District pursuant to the Boulder Canyon Project Act (43 U.S.C. 617-619b), which is located on lands included in the Joshua Tree National Park, but outside lands designated as wilderness..."
>
> "Nothing in this title shall have the effect of terminating the fee title to the lands or customary operation, maintenance, repair, and replacement activities on or under lands granted to the Metropolitan Water District pursuant to the Act of June 18, 1932 (47 Stat, 324), which are located on lands included in the Joshua Tree National Park, but outside of lands designated as wilderness under section 601(a)(2)..."

Two tracts of MWD land are in the park and not outside of land designated by section 601 of the California Desert Protection Act as wilderness. The tracts are #13503 and #13603. According to the report on the California Desert Protection Act of the House Committee on Natural Resources, the MWD agreed to abandon these parcels so as to enhance Joshua Tree's wilderness management. These tracts are in the wilderness zone.

MWD use of its 1932 act fee land in the park and outside of wilderness, in accordance with the purposes of the act of 1932, are by law compatible with the park. However, the California Desert Protection Act modifies the manner in which the MWD may conduct its activities on 1932 act fee lands and 1928 rights-of-way in the park. The law prescribes that "such activities shall be conducted in a manner which will minimize the impact on park resources." Because of their special nature, the MWD lands and rights-of-way are designated as a special use zone.

The MWD owns 1,621 acres in the park. The special use zone includes only 811 acres of that land, which is likely to remain in MWD ownership in perpetuity for the operation and maintenance of the Colorado River aqueduct and associated facilities. Some of the MWD land may not be needed in the future and could be sold or relinquished to the United States. For example, over 100 acres of MWD land lies inside wilderness. The MWD has committed to relinquish such land to the United States. The MWD special use zone includes NPS tracts numbered 11234 (west Cholla camp), 11917 (Pinto Well and road), 13704 (Coxcomb utility lines), 13705 (south Coxcomb tunnel), 13716 (powerline), 14005 (west Eagle Mountain aqueduct and associated camps and utility lines), 14204 (Hayfield tunnel), 14304 (camp), 14440, 14441, 14443, and 14444 (associated with a right-of-way for a 33-kv powerline). The tract numbers are listed and depicted in the *Land Protection Plan.*

The special use zone does not include land with non-MWD power or right-of-way facilities now in the park, such as American Telephone and Telegraph's Belle Mountain microwave tower. That facility is on land that was added to the park in 1994. The California Desert Protection Act does not provide the same level of protection for that facility as was conferred on MWD facilities. When the right-of-way for the Belle Mountain microwave tower expires on March 19, 2014, the National Park Service will not renew the right-of-way. The land at Belle Mountain is to be zoned for its intended management use and values (natural zone), not for the existing condition.

REDESCRIPTION OF 1995 GMP ZONING

Alternative A recalculates the amount of wilderness in the park, including the 1976 wilderness zone, and retitles the natural environment subzone as the backcountry transition subzone.

The 1976 act of Congress (PL 94-567) established 429,690 acres of wilderness and 37,550 acres of potential wilderness in Joshua Tree National Monument. The act directed the National Park Service to present to Congress a map and legal description of that wilderness.

The National Park Service published maps that were numbered 15620,003D and dated February 1977. The legal description that accompanied the official wilderness maps states that there were 422,320 acres of wilderness and 30,740 acres of potential wilderness in the monument for a total of 453,060. Since the act of 1976 states that the maps and legal description prepared by the NPS "shall have the same force and effect as if included in this Act," this alternative presumes that the acreage of 453,060 wilderness and potential wilderness is definitive.

In January 1997, the National Park Service detected errors that amounted to 200 acres in the maps and legal description cited above. Under authority of the 1976 act creating Joshua Tree National Monument wilderness, the errors were corrected. As a result there were 422,520 acres of wilderness and 30,740 acres of potential wilderness, totaling 453,260, which is 13,920 fewer acres of wilderness and potential wilderness acres than Congress authorized in 1976.

Congress added 131,780 acres of wilderness in 1994. The total wilderness in the park is therefore approximately 585,040 acres.

On May 27, 1997 the National Park Service published a notice in the *Federal Register* under section 3 of PL 94-567 to convert 3,052.20 acres of potential wilderness, designated in 1976, to full wilderness. Thus, there are now 557,802 acres of wilderness and 27,238 acres of potential wilderness in the park for a total of 585,040 acres.

The park wilderness and potential wilderness of 585,040 acres is subdivided into:

Experience class A (178,622 acres) — This area of wilderness, managed under the standards of the Wilderness Act, is less remote than class B. It is more easily accessed by foot or horseback. This area of wilderness (because it is not as far from roadsides) may be subject to occasional noise or visual intrusions from activities outside of the wilderness subzone. The visitor to this area of wilderness may experience some sights and sounds of the modern world.

Experience class B (406,418 acres) — This area of wilderness is more removed from possible sources of intrusion by the sights and sounds of the modern world than class A. Visitors to this area will be insulated by greater distance from activities that may interfere with a sense of solitude and of primeval nature.

These subdivisions of wilderness speak only to the nature of the experience a visitor may find in each. The experience classes do not imply that the National Park Service will manage any part of wilderness more or less protectively. The National Park Service is required to manage all wilderness in accordance with the provisions of the Wilderness Act of 1994 and will manage the wilderness uniformly without regard to the experience classes. National Park Service management will not vary because the area of wilderness is one where the visitor experience is more or less removed from audible or visible human intrusions.

PROPOSED ADDITIONS TO DESIGNATED PARK WILDERNESS

The *General Management Plan* states that the *Backcountry and Wilderness Management Plan* would serve as a vehicle to determine if lands not now designated as wilderness should be proposed for designation.

The Former Joshua Tree National Monument

This plan recommends minor additions, totaling 9,060 acres, to the wilderness established in 1976. The plan recommendations do not alter the 1976 wilderness boundaries, but only recommends that the Secretary of the Interior and the President transmit to Congress a proposal for such revisions. Pursuant to section 3(c) of the Wilderness Act, Congress alone may designate wilderness in areas of the national park system.

This plan, along with the public hearings and notice in the *Federal Register* concerning this plan, fulfills the conditions for recommending wilderness boundary modifications or adjustments required. There are no nonfederal land or interests or mining claims within the additions recommended.

The five minor additions are:

(1) to 1976 wilderness unit #7, T1S, R14E, section 36, W½, W½ of NE¼ — 400 acres

The 1976 wilderness provision did not designate this land as wilderness because it was a state-owned tract. Nor did the 1976 act designate it as potential wilderness, as Congress did for all other state-owned tracts in the monument, because this 400-acre tract was then on the outer boundary of the monument. Now that the park has been expanded to the north, and the lands to the north were designated wilderness in 1994, this tract represents an anomaly. If the National Park Service gains title to the tract, it will be an isolated island of Federal nonwilderness land surrounded on all sides by Federal wilderness.

(2) to 1976 wilderness unit #3, T3S, R9E, section 9, NW¼, SW¼, and SE¼ — 480 acres; section 10, S½ — 320 acres, section 15, N½ —320 acres; section 16, — 640 acres; section 21, E½ — 320 acres; section 28, E½ — 320 acres

This land was excluded from the original National Park Service wilderness proposal because there were several large nonfederal tracts when that proposal was made. The National Park Service acquired the land, except for one state of California tract, after the wilderness proposal was made to Congress.

(3) to 1976 wilderness unit #6, T5S, R11E, section 1, W½, W½, E½ — 480 acres; section 12, NW¼, NE¼, NE¼, NW¼, W½, W½ — 240 acres; section 13, NW¼, NW¼, SW¼, NW¼, NW¼, SW¼ — 120 acres

This land has all the characteristics of wilderness with no development, and no developments are planned.

(4) to 1976 wilderness unit #6, T5S, R12E, section 29, N½, NE¼, SW¼, N½, SE¼ — 440 acres; section 28, NW¼, NW¼, S½, N½, S½ — 520 acres; section 27, S½, NW¼, SW¼, W½, W½, SE¼, W½, SE¼, NE¼ — 300 acres; section 33, NE¼, NE¼, — 40 acres; section 34, W½, S½, SE¼, W½, NW¼, NE¼, SW¼, NE¼, NW¼, SE¼ — 480 acres; section 35, SW¼, SW¼, — 40 acres

This land was not included in 1976 wilderness because of a waterline from a spring in Lost Palm Canyon. That waterline was subject of a National Park Service special use permit that was issued in 1966 and expired in 1986. No one possesses any rights under California law to appropriate water from this source. Much of the waterline has now been removed.

(5) to 1976 wilderness unit #2, T2S, R8E, section 19, — 640 acres; section 30, — 640 acres; T2S, R 7E, section 22, E½, SE¼ — 80 acres; section 23, W½, SW¼, SE¼, SW¼ — 120 acres; section 24, E½, E½ — 160 acres; section 25, — 640 acres; section 26, N½ — 320 acres; section 27, E½ — 320 acres; section 34, N½, NE¼ — 80 acres

The 1976 wilderness provision did not designate this land as wilderness because of the presence of two National Park Service administrative roads and limited water development for wildlife at Stubbe Springs. The water development has since been removed and no replacements are planned. Under this alternative, the land would be administered as wilderness.

If the above changes were adopted, the land described above would be rezoned from the backcountry transition subzone to the wilderness subzone. Additions 2, 3, and 4 would be further classified as experience class A. Addition 1 would be classified as experience class B. Addition 5 would be experience class A except for that portion lying west of the crest of the Little San Bernardino Mountains, which would be experience class B.

Land Added to Joshua Tree National Park in 1994

A review of suitability for wilderness designation should be conducted on a roadless area in the Cottonwood Mountains. The study should be completed within three years after the final version of this draft plan is adopted and should make a written determination of suitability or unsuitability. If the area were to be found suitable, the study would produce a recommendation by the Secretary of the Interior to the President under section 3(c) of the Wilderness Act. The area to be studied lies west of Cottonwood Road, south and east of Pinkham Canyon Road, south of the old monument boundary, and north of the MWD Colorado River aqueduct. The wilderness study area encompasses approximately 27,000 roadless acres and would extend wilderness unit 4. The BLM did not conduct a wilderness review for this area under the Federal Land Policy and Management Act of 1976 because the area was fragmented by about 50 percent nonfederal ownership. The area is now federally owned.

INTERIM MANAGEMENT OF PROPOSED WILDERNESS AREAS

National Park Service policy directs that areas recommended for wilderness designation or for wilderness study be managed in such a way as to not diminish the wilderness suitability until the legislative process has been completed.

VISITOR ENJOYMENT

Trail Designation

A comprehensive system of trails and corridors would be designated in the park that would provide foot, bicycle, and equestrian access into the backcountry transition and wilderness subzones.

Designated trails would be specifically defined and identified by an impacted surface area. They would be maintained to varying degrees. All designated trailheads would be marked with signs. Designated corridors would be specifically defined routes of travel and would often follow the natural terrain, such as desert washes or rock passes. Corridors would not be maintained, but signs could be installed.

The quality of the trail system would be improved through a concerted management program. A new system of trails would be designated; new trails would be maintained, and existing trails would be rehabilitated. This would provide park visitors with opportunities to experience the backcountry and wilderness of Joshua Tree National Park. At the same time, this system would establish a trail network that would require minimal expenditures of time, money, and effort to maintain. Development of the system would provide for better resource protection. The construction or maintenance of trails in wilderness is necessary for the proper administration and protection of wilderness and its resources. When working on trails, motorized equipment, motor vehicles, aircraft, or mechanized transport would be used only after a minimum requirement determination is made for each project.

Backcountry and wilderness trails would be unpaved and only wide enough for single-file travel. Trails intended for horse and bike travel would also be only wide enough for traveling single file. Trails would be maintained and signed in keeping with the nature of the zone through which they pass. Signs would be more prevalent in the developed zone than in the backcountry transition and wilderness subzones. In the wilderness subzone, signs or markers would be installed only as necessary to define the trail and provide for visitor safety and resource protection. In the developed zone and backcountry transition zones, interpretive signs could be installed. Nearly 270 miles of backcountry and wilderness trails are proposed. Nature trails total an additional 8.6 miles.

Many more miles of trails are proposed than are now designated. However, many fewer miles of designated trails are proposed than now exist as casual or social trails. Cross-country routes of travel, other than six designated corridors, will not be identified. Visitors can hike the open desert but topographical maps and compasses are recommended. Various publications and maps that can be obtained locally have identified many routes.

To protect the wilderness ambience, the undesignated routes of travel would not be maintained. Six corridors have been proposed for horse travel in addition to the designated and maintained equestrian trails. These corridors follow topographical features and provide for primitive riding and hiking. The corridors would not be maintained as trails but could be signed. The designated corridors total approximately 55 miles.

There would be 14 backcountry self-registration boards for overnight camping, 1 more than now. All overnight campers in the backcountry and wilderness would be required to park and register at one of the 14 backcountry board locations (with the exception of those where there

are no backcountry boards). Those entering the park in remote locations could obtain a permit from any ranger, at any ranger station, and at the visitor centers at park headquarters and Cottonwood. The remote areas are the east Pinto Basin, Coxcomb and Pinto Mountains, Eagle Mountains, and Cottonwood Mountains.

Day users would not be required to register and could enter the backcountry and wilderness at any location. Backcountry boards would provide registration forms, park rules and regulations, a small map of the immediate area, and any special limits or interpretive messages.

Hiking

Cross-country hiking would be allowed throughout the park except for Keys Ranch, which would be closed to unescorted visitors. Use of the trail system would be encouraged. Most of the park would not contain officially designated trails; dispersed travel would be recommended so that unofficial social trails do not develop and areas are not denuded of vegetation. Topographical maps, compasses, ample water, and survival gear are recommended for travel off-trail.

Stock Use

Stock use would be limited to horses and mules and restricted to designated equestrian trails and corridors. In addition, stock would be allowed on all dirt roads open to motor vehicles and on the shoulders of paved roads. Stock would have to travel single file and would not be allowed within 200 feet of any natural or artificial water source, including springs, seeps, wells, dams, and tanks.

Portions of Ryan and Black Rock Campgrounds would be designated for overnight frontcountry stock use. A day use staging area would be created at the west entrance old borrow pit. These three areas would be the primary staging areas for equestrians. The terminus of the Lower Covington Flat Road at the California riding and hiking spur (mile 30), would be an equestrian parking area. This area was identified as the Lower Covington Flat picnic area in the *General Management Plan* but no longer serves that purpose. A fire in August 1995 destroyed the site. Other areas such as Indian Cove, Twin Tanks, and North Entrance could provide good parking and access for horses. Numerous other parking areas could accommodate horse trailers and, provided that the trailers do not obstruct traffic, they would be permitted. Increases in visitor use could require additional parking areas for horse trailers.

Bicycle Use

Bicycles would be allowed on all roads open to motor vehicles. In addition, approximately 22 miles of bike trails would be designated. Bicycles would be restricted to roads and designated bicycle trails. With the exception of the Thermal Canyon Trail, the bicycle trails would be open to equestrian use. Caution on multiple-use trails is recommended.

Regional Trails and Access

The town of Yucca Valley has proposed a trail from La Contenta Road directly south to the park boundary that would become a part of the California Riding and Hiking Trail. A short section of trail to meet Yucca Valley's portion would be designated. The current trail, which continues 2 miles to the Black Rock Campground, would become the California Riding and Hiking Trail Black Rock Spur.

Other regionally proposed access points include:

Long Canyon north and south
Wide Canyon
Deception Canyon
Fan Hill Canyon
Pushawalla Canyon
Black Rock area dirt road
West entrance and BLM section 5

Long and Pushawalla Canyons would be designated as corridors. They would be unmaintained and would follow the canyon bottoms. Access to these areas would offer some recreational opportunities.

The Black Rock area dirt roads would offer access by both horse and foot traffic into the network of trails in the area. There would be ample recreational opportunities.

The BLM section north of the west entrance station would provide access to the network of trails in the vicinity. This would provide an opportunity for equestrians to access this area without staging at the borrow pit inside the west entrance.

There would be no trails or corridors designated inside the park in the Wide, Deception and Fan Hill Canyon areas. Since no trails exist, hiking would be cross-country. Recreational opportunities could be limited, and development of parking areas and entry points would not be recommended.

In the future, there could be public interest in additional hiking access along the park boundary. As the adjacent land management agency or public entity secured public access up to the park boundary, the National Park Service would consider adding new trails to link the new access points. Each such addition not covered in this document would be considered in a separate environmental assessment.

Roads

This alternative would designate 36.9 miles of eight roads on the land added to the park in 1994 as open to the operation of motor vehicles. The roads are:

- Berdoo Canyon Road — 6.5 miles beginning at old monument boundary, west to new park boundary
- Pinkham Canyon Road — 12 miles beginning at old monument boundary, west and then south to new park boundary

- Thermal Canyon Road — 3.5 miles beginning in T5S, R9E, south to new park boundary
- a connecting link from Pinkham Canyon Road to Thermal Canyon Road — 2.5 miles
- Black Eagle Mine Road — 3.2 miles beginning at old monument boundary easterly to the new boundary
- Grubstake Canyon Road — 3.3 miles beginning at the Black Eagle Mine Road north to the old monument boundary
- Powerline Roads east — 3.5 miles, and west — 1.2 miles, follows the 220-kv powerline that lies on a right-of-way issued to the Metropolitan Water District
- West Eagle Mountain aqueduct access road — 1.2 miles beginning at the eastern park boundary and traversing sections 36 and 35, T4S, R14E to its junction with the MWD West Eagle Mountain tunnel just south of the MWD Eagle Wash camp and dump area. A 2.2-mile connection can be made to the south along an MWD 33-kv powerline right-of-way that extends to the park boundary. This plan would not designate such land as open to public vehicle use since the land involved belong to the MWD under the act of 1932 (47 Stat. 324). Use of the land by the public is determined by the MWD.

This proposed action would not authorize any public use, by motor vehicle or otherwise, of any portion of the above roads that cross privately or state-owned lands where such use would constitute trespass.

The above roads lie in nonwilderness and the National Park Service could permit motor vehicles on them. The roads would be open only to registered motor vehicles that are legal to operate on the public roads of the state of California. This alternative would not provide for the operation of off-road vehicles or California Green-Sticker Program vehicles anywhere in the park. In Joshua Tree National Park, the public could operate motor vehicles only on designated roads and parking lots. The operation of motor vehicles elsewhere in the park is prohibited by 36 CFR 4.10. National Park Service regulations preclude developing a special regulation that would permit off-road vehicle use in the park on routes or areas other than roads.

This alternative would afford a driving experience that is not found elsewhere in the park. The dirt roads are rough and require four-wheel drive vehicles. The roads traverse gorges that are deeply incised into the Little San Bernardino and Eagle Mountains. The terrain is rugged and dry and has a quiet and austere beauty. These roads should not be driven without the proper vehicle, equipment, and preparation.

The roads designated as open would be closed to commercial vehicles under 36 CFR 5.6(b), as are the roads designated as open to public use in the former national monument. The commercial vehicle prohibition does not apply to commercial vehicles that serve private concerns or interests in the park. Access by such commercial vehicles is governed by permit under 36 CFR 5.6(c).

Some of the roads listed as open predate the park (1994) or monument (1936) and could be found to constitute rights of public highway under revised statute 2477. The National Park Service is authorized to regulate public use of the roads on park land.

Climbing

This alternative generally would permit rock climbing in any part of the park that is open to other public uses. Keys Ranch would be the exception. Rock climbing is a legitimate and appropriate

form of recreation for national parks. Joshua Tree National Park is world renowned for the quality of its rock climbing. Rock climbing would be managed to ensure that Joshua Tree provides a wide range of opportunities — from sport climbing, requiring the installation of permanent fixed anchors (expansion bolts), to more traditional climbing. Permitting fixed anchors in certain zones of the park and not allowing them in others would affect climbers' ability to establish new routes. Climbing methods would be managed to afford a wide range of experiences even if that results in potential routes remaining unclimbed, given current climbing technology.

In permitting recreational activities, including rock climbing, the National Park Service must ensure that there is no damage to natural and cultural resources and must protect the wilderness values of the park. Wilderness, according to the Wilderness Act, is an area where the earth is untrammeled by man, retaining its primeval character without permanent improvements. The permanent installation of bolts detracts from wilderness. This alternative would prohibit the installation of expansion bolts into rock faces in the designated wilderness (wilderness subzone) of the park.

This alternative would permit the installation of new bolts in rock faces in the backcountry transition subzone and the developed zone. Replacement of bolts in these zones would be permitted bolt for bolt. The use of power drills would not be permitted for installation or replacement of bolts. Climbers would be permitted to install bolts on a new route only under permit. A new route would be defined as one that lies ten or more feet from a bolted route. Each person who would install a new bolted route would apply to the Superintendent for a permit between May 1 and June 30 of each year. Each permit application would be evaluated. It would be determined if the new bolted route would harm vegetation on the rock face, cultural resources, raptor nesting areas, the quality of the climbing experience, or natural resources at the rock base. The density of existing bolted routes on that rock face or nearby areas would be taken into account, and traffic, campground congestion, and other infrastructure demands created by new permits for bolting would be considered.

Permits would be issued by the October 15 following the June 30 application deadline. In determining which permits to issue, the National Park Service would request that five members of the Joshua Tree National Park Advisory Commission, established by section 407 of the California Desert Protection Act, form a bolting advisory subcommittee. The advisory commission was established to advise the National Park Service on the development and implementation of this plan. The five members who will serve on the bolting advisory subcommittee would have expertise in geology, biology, cultural resources, law enforcement, and the protection of resources. One could possess special rock climbing expertise.

Because this group would provide recommendations and advice, the bolting advisory subcommittee would act as part of the legally established Joshua Tree National Park Advisory Commission and would meet the requirements of the Federal Advisory Committee Act (PL 92-463) and its implementing regulations, 41 CFR 101-6.10. All meetings of the subcommittee or the parent advisory commission would be open to the public.

To reduce the impact of climbing activities on bolted or unbolted routes anywhere in the park, this alternative proposes to limit the use of chalk. The chipping and gluing of new holds is now prohibited, and the prohibition would continue. Slings would have to be removed from fixed anchors. Climbing would not be permitted within 50 feet of any prehistoric or historic rock art

site or other cultural resource. Removing vegetation from cracks (route-cleaning) would be prohibited.

The National Park Service does not and would not maintain any climbing routes or the associated climbing hardware and software; it would not provide supervision or climbing instruction and would not be responsible for the condition of climbing terrain or routes or the acts of climbers. The National Park Service explicitly disclaims all responsibility for the safety of bolts, pitons, or anchor systems in the park.

Certain areas (such as Keys Ranch) would continue to be closed to climbing to protect threatened or endangered species, nesting birds, cultural resources, and vegetation. Climbing enclosure areas could be created in which climbing would be excluded to provide a control area for the study of the climbing impacts. There would be no general closures for climbing, although some small, currently unclimbed areas could be permanently closed to climbing for study purposes. Authority for closures was granted in 36 CFR 1.5. Incidental business permits would not be issued for commercial climbing groups in some areas to protect visitor experience, resources, or both.

Automobile Camping

Automobile camping would be allowed only in designated campgrounds identified in the *General Management Plan*, all of which are in the developed zone of the former monument. No new campgrounds would be constructed on the land added to the park in 1994. Automobile camping would not be allowed along dirt roads. The land added in 1994 would be managed in the same way and to the same standards as the land in the former monument.

Group Sizes, Backcountry Camping

Limits would be imposed on the size of groups that enter the natural zone to camp overnight. The group size limit in the backcountry transition subzone would be 25. In experience class A wilderness, overnight group size would be limited to 12. In experience class B wilderness, groups would be limited to 8. The imposition of group sizes would protect the quality and variety of experiences that backcountry and wilderness users expect. The more inaccessible wilderness (experience class B), where visitor expectations for solitude are greatest, would have the most stringent size limit.

Backcountry overnight group camping would be permitted anywhere in the backcountry transition and wilderness subzones that is otherwise open to the public and that is more than 1 mile from an open road and 500 feet from a designated trail or a natural water source. This alternative does not propose to subdivide the backcountry transition and wilderness subzones into smaller zones or impose limits on the number of parties permitted in each subdivision at any one time.

Commercial Services and Overnight Use

This alternative would continue to authorize issuance of incidental business permits for guide services (hiking, climbing, equestrian, nature experience) for the wilderness subzone. The

Wilderness Act, section 4(c), prohibits commercial enterprises in wilderness, but section 4(d)(6), permits commercial services to the extent necessary for activities that are considered proper for realizing recreational or other wilderness purposes of the wilderness. Commercial guiding services fit the description of section 4(d)(6). The Wilderness Act provides no exceptions under which commercial services could engage in activities specifically prohibited by section 4(c) of the Wilderness Act, such as building roads or structures or using motor vehicles.

The group size limits proposed also apply to incidental business permittees. If a permittee proposes to camp in a zone with a group larger than permitted for that zone, the permit would specify that the large group would have to be divided into smaller groups to meet the limits. Such smaller groups must camp at least one mile apart.

Area Closures

The restriction on overnight use in the backcountry transition and wilderness subzones for the following areas would be maintained:

Cultural Sites — Keys Ranch (640 acres), Lost Horse Mine Site (80 acres)

Water Sources — Lost Palms and Munsen Canyons (3,840 acres), Buzzard Springs (2,640 acres), Rattlesnake Spring (2,640 acres), Smith Water Canyon (1,280 acres), Coxcomb Adit (2,640 acres), Stubbe Springs (5,120 acres)

Land Areas — Wonderland of Rocks (30,053 acres), Pushawalla (7,680 acres)

Most of these restrictions would protect areas important to bighorn sheep lambing and watering. They would also prevent impacts associated with overnight camping. The Keys Ranch site would be closed to the public except when accompanied by a National Park Service guide. The areas that are closed to overnight use comprise 56,613 acres, or 7 percent of the park.

RESOURCES MANAGEMENT

Artificial Water Sources

Three major artificial water sources in the park were installed for the benefit of bighorn sheep (*Ovis canadensis nelsonii*). Those water sources include Russi's Rocks, Coxcomb, and Pushawalla (also known as Pinto Wells, not to be confused with the MWD Pinto Well). Russi's Rocks and Coxcomb were constructed on BLM nonwilderness before 1986. The National Park Service constructed Pushawalla on designated potential wilderness in 1978. No environmental compliance documents were completed for these projects.

All three of the artificial water sources are now in legislative wilderness (Russi's Rocks and Coxcomb) or potential wilderness (Pushawalla). A determination must be made as to whether there is a policy justification for habitat manipulation in the park or if there could be an exception to Wilderness Act prohibitions on structures and installations for the artificial water sources.

Habitat Manipulation

NPS (NPS-77) policies on animal management direct that "natural processes will be relied upon to control populations of native species to the greatest extent possible." Artificial water sources are a form habitat manipulation. In desert ecosystems, water is a crucial limiting factor to populations. As a general rule, habitat manipulation for management of native animals is permitted if the species are Federally listed as threatened or endangered species, which the desert bighorn sheep is not. Habitat manipulation is, however, allowed to restore disturbed or altered habitat.

This alternative recommends that each functioning, artificial water source in the park that supports wildlife be examined over the three years following the adoption of final version of this draft *General Management Plan* amendment to determine if it actually supports bighorn sheep and if bighorn populations have become dependent on the source. The examination would also determine if the artificial water source is replacing a natural source that has been disturbed or altered by human activities inside or outside the park. If the water source is not supporting wildlife or is not replacing a natural source that has been altered, disturbed, or destroyed by human mining, pumping, canal-building or other activities, the artificial water source would be removed. None of the sources qualify for the List of Classified Structures. None are on the National Register of Historic Places or
eligible for listing.

Artificial water sources are not always beneficial to all forms of wildlife. Artificial water sources have been responsible for killing large numbers of bees that drown in the water. The failure of an improperly maintained system elsewhere in the California Desert resulted in substantial mortality to bighorn themselves. Artificial sources of water also benefit nonnative animals; the Pushawalla Guzzler was used by a small herd of feral burros in the mid-1980s. The herd was removed by the National Park Service in 1986.

Wilderness

Wilderness is more than empty space. Wilderness is an area where "earth and its community of life are untrammeled by man . . . retaining its primeval character and influence, without permanent improvements" (16 USC 1131). Native plants and animals are integral to wilderness. The maintenance of wild and self-sustaining populations of native animals and plants is part of the National Park Service mission, both under the Organic Act of 1916 and under the Wilderness Act of 1964.

Section 4(c) of the Wilderness Act prohibits, among other things, the placement of structures or installations in wilderness areas. Artificial water sources, with pipes, tanks, and associated facilities, constitute structures or installations, but the Wilderness Act allows an exception to the prohibitions of section 4(c) "as necessary to meet minimum requirements for the administration of the area for the purpose of" the Wilderness Act. Under this minimum requirement exception, the Federal land management agency may engage in otherwise prohibited activities.

The original proposed language for the Joshua Tree National Monument wilderness gave the Secretary authority "...to construct and maintain wildlife watering devices" in the wilderness. Congress chose not to enact this language when it created the Joshua Tree wilderness in 1976. The California Desert Protection Act waived the Wilderness Act prohibitions to make an

exception for wildlife management in the BLM-administered wilderness areas (section 103[f]), but the act did not provide a similar waiver for the National Park Service wilderness. Since no other statutory exemptions apply, the only applicable exception to wildlife watering devices in wilderness in Joshua Tree must be the minimum requirement test of section 4(c). This test must be applied to all three artificial water sources in the park. Water sources that fail the test would be removed.

Because a central purpose in administering wilderness is to maintain wild populations of native animals, the minimum requirement exception could be used to allow the continued existence, installation, and servicing of artificial water sources, but only if such sources are deemed necessary.

All three major artificial water sources would be examined to determine if they meet National Park Service policy on habitat manipulation for native animals and the minimum requirement for administration of wilderness. The National Park Service would apply the tests to the three artificial water sources in the park within three years of the publication of the final *General Management Plan* amendment. Each source that fails the tests would be removed over the following two years. At the end of five years the natural zone would conform to National Park Service policy on animal management and the Wilderness Act. Should the National Park Service determine that an artificial water source should be removed, minimum requirement methods and means to would be used to accomplish that goal.

Other water sources that were constructed in the park have either been removed or fallen into disrepair. A water source was installed at Stubbe Spring (not in wilderness) in 1968 and removed in 1992/1993. A water source was installed in wilderness in 1970 at Rattlesnake Spring in the far northwest corner of the park. The source is no longer functional.

The Bureau of Land Management installed two small game/bird water sources on land that was not incorporated into the park until the 1950 boundary revisions. The sources are B-36 (T4S, R9E, section 3) east of Berdoo Canyon Road and B-37 (T3S, R6E, section 6) between east and west Wide Canyons. Both are in wilderness and no maintenance or inspection has been conducted for at least 20 years. What remains of these sites would be removed as time permits.

Desert Tortoise Recovery

On June 28, 1994, the FWS adopted a recovery plan for the Mojave population of the desert tortoise. The *Desert Tortoise Recovery Plan* recommended that Federal land management agencies designate desert wildlife management areas in which "...some human activities must be restricted." The *Recovery Plan* further recommends the kind of activities that "should be prohibited...because they are generally incompatible with desert tortoise recovery".

This alternative would implement the *Desert Tortoise Recovery Plan* by immediately designating all of the natural zone of Joshua Tree National Park as a desert wildlife management area and adopting all of the *Recovery Plan's* management recommendations for desert wildlife management areas, except for fencing. The natural zone consists of 790,028 acres(557,364 acres in the natural zone of the former monument lands and 232,664 acres in the natural zone of the land added in 1994).

National Park Service regulations prohibit all but one of the activities (competitive organized events on designated roads) that the *Recovery Plan* describes as incompatible. The *Recovery Plan* list of incompatible activities includes:

- all vehicle use off designated roads,
- competitive organized events on designated roads,
- habitat-destroying military maneuvers,
- clearing for agriculture,
- creation of landfills,
- surface disturbance that diminishes capacity of the land to support tortoises, other wildlife, or vegetation in all areas of the park except the developed zone,
- domestic livestock grazing,
- grazing by feral horses and burros,
- vegetation harvest, except by permit,
- collection of biological specimens, except by permit,
- dumping and littering,
- deposition of captive or displaced tortoises except under authorized translocation research permits,
- uncontrolled dogs,
- discharge of firearms, and
- hunting.

The National Park Service would not approve requests under 36 CFR 2.50 for organized motor vehicle racing or timed events. Such events would not meet the standards of 36 CFR 2.50(a). There is no recent record of a request for this activity so the restriction would not affect established uses within the park.

This alternative would permit organized motor vehicle events that are not competitive or timed, such as motor home caravans, vintage car tours, or group motorcycle tours. However, the size of such organized noncompetitive events would be limited to no more than 50 vehicles, would require that speeds not exceed the posted speed limits, and would restrict the event to paved roads from March through October. During the tortoise hibernation season (November 1 to March 1), such events would be allowed on all designated roads in the park, both paved or unpaved. Prior to National Park Service authorization of such an event, consultation with the FWS as required by 50 CFR part 402 would be completed.

The *Recovery Plan* also lists activities that are "compatible with desert tortoise recovery and may be allowed in DWMAs." They include parking and camping in designated areas and limited speed travel on designated roads. Automobile parking and camping would be permitted only in designated areas. Automobile camping along roadsides would not be permitted. Allowing camping only in designated areas conforms to the *Recovery Plan* recommendations.

The National Park Service has established speed limits on all of the roads in the former monument under 36 CFR 4.21. The speed limit is 45 miles per hour for paved roads and 25 miles per hour for unpaved roads. Under 36 CFR 4.21(b), a 25-mile per hour speed limit would be established on the dirt roads that traverse designated critical tortoise habitat and are in the designated wildlife management area. The Endangered Species Act forbids harming or taking a threatened species by anyone, including governments. Some National Park Service actions or omissions, such as failing to regulate motor vehicle speeds, could cause harm to listed animals, so a low speed limit would be established to minimize mortality to tortoises from vehicles.

The Distinction Between Designated Wildlife Management Areas and Critical Habitat

On February 8, 1994, the FWS published a final rule to designate habitat critical to the desert tortoise. Critical habitat is defined in the Endangered Species Act as "specific areas within the geographic area occupied by the species . . . on which are found those physical or biological features essential to the conservation of the species and which may require special management considerations or protection." Critical habitat is protected under section 7 of the Endangered Species Act, which requires consultation for actions carried out, funded, or authorized by a Federal agency. Designating critical habitat does not create a management plan and does not prescribe specific management actions for the lands designated.

The critical habitat designation of 1994 did not designate any land in Joshua Tree National Monument as critical habitat. The FWS explained that the "...current management policies of...Joshua Tree National Monument provide adequate protection against potential habitat-altering activities because" the monument is primarily managed as a natural ecosystem (59 *Federal Register* 5825). Although the former Joshua Tree National Monument is not critical habitat, the FWS found that the monument was essential to the conservation of the species and should be considered in the development of recovery areas.

The designation of critical habitat did include land outside the former monument that was added to the park in October 1994. The Pinto Mountain critical habitat is almost entirely in the park as is a significant portion of the Chuckwalla critical habitat.

Designation of critical habitat does not carry out the recommendations of the *Recovery Plan.* The land management agency is responsible for implementing the *Recovery Plan.* The key recommendation of the *Recovery Plan* is the designation of designated wildlife management areas. The recovery plan states "...designation of critical habitat does provide protection of desert tortoise habitat until such time as the *Desert Tortoise Recovery Plan* is implemented and DWMA management is employed." This alternative would implement the *Desert Tortoise Recovery Plan* and designate a designated wildlife management area.

ALTERNATIVE B — NO ACTION

GENERAL DESCRIPTION

The no-action alternative would allow for the continuation of the status quo. Trails would be used and created by the passage of people and stock over time. Overnight users could camp anywhere in the backcountry transition and wilderness subzones in groups of any size. All driveable roads in nonwilderness would be open. Climbing would continue to be governed by the interim *Climbing Management Plan*, which was adopted in 1993. Visitors could camp only in designated sites in campgrounds. There would continue to be artificial water sources for wildlife, which would be repaired as necessary. No specific actions would be taken to implement the *Desert Tortoise Recovery Plan.*

MANAGEMENT ZONING

The present management zoning for the former Joshua Tree National Monument, as prescribed in the *General Management Plan*, would remain. No action would be taken to rezone the Gold Park Road that crosses 0.5 miles of park land. The road would be closed, and there would be no access to this area of BLM land. No action would be taken to zone the new land, although Congress designated 131,780 acres as wilderness.

VISITOR ENJOYMENT

Trail System

A series of undesignated trails, some constructed but most established by passage of hikers and horses, would continue to be used. Most would expand in both length and width over time. The National Park Service would not maintain trails, designate access points, or erect signs. Trails would proliferate laterally to one another, often within short distances. Over time, trails would continue to develop with no design or plan. All trails and routes created by this haphazard method would continue to be open for use by all hikers and horse users. No trails are currently open to bicyclists, and none would be added.

Visitors intending to remain overnight in the backcountry transition or wilderness subzones would be required to park in designated parking areas. No additional backcountry registration boards would be installed, and no backcountry parking areas would be added. Permits would not be required for overnight stays in the natural zone at remote locations where no boards exist.

Hikers could camp overnight anywhere in the backcountry transition and wilderness subzones, as long as the campsite is at least 1 mile from open roads and 500 feet from a trail. There would continue to be a limit of 30 nights per year for visitors to the backcountry transition and wilderness subzones.

Roads

Motor vehicles would continue to be allowed on all driveable roads in the nonwilderness additions to the park. On former national monument roads vehicles would continue to be confined to designated roads. In addition to the roads in the proposed action alternative, the roads that would be open under this alternative would be:

- Fargo Canyon Road — 2 miles
- Rockhouse Canyon Road — 7.4 miles
- Snow Cloud Mine Spur — 0.8 miles, from the Pinkham Canyon Road to the old Snowcloud mine area.

Climbing

The status quo would be maintained using the *Climbing Management Plan*, which prohibits the installation of expansion bolts in rock faces in designated wilderness. The plan permits the installation of new bolts in the nonwilderness zones. Permits could be issued for the use of power drills to replace bolts.

Automobile Camping

All automobile camping would be confined to designated campgrounds.

Group Sizes, Backcountry Camping

There would be no limits on the size of groups that use different zones for overnight camping. Overnight groups would be permitted anywhere in the backcountry transition and wilderness subzones that is open to public use and 1 mile from an open road and 500 feet from a designated trail or a natural water source. There would be no limits imposed on the number of parties permitted in each zone at any one time. No limits would be imposed on the size of day use groups.

Area Closures

Restrictions on overnight use would be continued in the backcountry transition and wilderness subzones for the following areas, which comprise seven percent of the park:

Cultural Sites — Keys Ranch (640 acres), Lost Horse Mine Site (80 acres)

Water Sources — Lost Palms and Munsen Canyons (3840 acres), Buzzard Springs (2640 acres), Rattlesnake Spring (2640 acres), Smith Water Canyon (1280 acres), Coxcomb Adit (2640 acres), Stubbe Springs (5120 acres)

Land Areas — Wonderland of Rocks (30,053 acres), Pushawalla (7,680 acres)

The Keys Ranch site would be closed to the public except for guided tours.

RESOURCES MANAGEMENT

Artificial Water Sources

The three major artificial water sources in the park would remain, but would not be studied. The National Park Service would not scrutinize their propriety or efficacy. The artificial water sources would not be maintained or repaired, but would be removed if they began to pose a hazard to wildlife. They would deteriorate and eventually fail over time. No new sources would be installed.

Desert Tortoise Recovery

On June 28, 1994, the FWS adopted a recovery plan for the Mojave population of the desert tortoise. The *Desert Tortoise Recovery Plan* recommended that Federal land management agencies designate desert wildlife management areas. The *Recovery Plan* further recommends the kind of activities that may, or should not, be permitted to minimize impacts on the desert tortoise. Under the no-action alternative, no formal action would be taken to implement the recommendations of the *Recovery Plan*. However, National Park Service regulations or policies already in place prohibit the disturbance of natural resources. Off-road vehicles, dogs in the backcountry, and feral burros and horses are restricted. All but one of the *Recovery Plan* recommended actions have already been taken.

No further action would be taken to regulate public use. The National Park Service would be required to consult the FWS on actions that could affect the desert tortoise.

ALTERNATIVE C — MAXIMUM PROTECTION

GENERAL DESCRIPTION

This alternative would impose restrictions on all uses in the park and would provide the most rigorous and strict protection of resources, particularly the wilderness. Land in the natural zone that is not wilderness would be treated and managed as wilderness. Entry into the backcountry transition and wilderness subzones would be strictly regulated. Overnight camping in the backcountry/wilderness would be permitted only at created and hardened designated sites. No roads would be designated on any of the new land. Climbing would be permitted but without the aid of fixed anchors. Fixed anchors would be removed from wilderness and nonwilderness. There would be no vehicle travel on any of the roads through the new land, which would eliminate auto camping along those roads. All artificial water sources in wilderness would be removed immediately. The new park land and the backcountry and wilderness subzones of the former monument would be managed for their cultural and natural values with emphasis on the conservation of desert tortoise.

MANAGEMENT ZONING

The management zoning for the former Joshua Tree National Monument, as prescribed in the 1995 *General Management Plan* would be altered to propose the designation of some areas as wilderness.

The land added in 1994 would be zoned as:

Natural Zone (233,039 acres)

Preservation of natural resources and of the natural processes that shape such resources are primary in natural zones, and only uses that do not adversely affect these resources would be permitted.

Natural Environment Subzone (or Backcountry Transition) (101,259 acres)

The natural environment subzone or the backcountry transition subzone is zoned for the conservation of natural resources and processes, but the land is not designated as wilderness. In this subzone, minor facilities could be constructed or operated (such as patrol stations or toilets), motor vehicles could be operated, aircraft could land, and activities that are prohibited in wilderness could take place. Since this subzone is also intended to preserve natural resources, however, any proposed development would be minor. Recreational activities, such as bicycle riding on trails, could be allowed that are forbidden in wilderness.

Wilderness (131,780 acres)

This zone would be governed by the strictest of preservation standards. The land in this zone would be managed for the preservation of natural resources and processes and the preservation of its undeveloped and primeval character.

Development Zone (0 acres)

None.

Special Use Zone (961 acres)

The special use zone would be the same as described in alternative A.

VISITOR ENJOYMENT

Trail System

All trails but Ryan Mountain, Lost Palms, California Riding and Hiking, Fortynine Palms, Lost Horse Mine, and Mastodon Peak trails would be closed. The open trails would be maintained, access points would be designated, and signs would be posted. Only designated trails would be open for hikers and equestrians. No trails would be open to bicyclists.

Overnight campers in the backcountry transition or wilderness subzones would enter those zones only at designated points. New backcountry registration boards would be installed at all such access points. There would be a limit of 30 camper nights per year for visitors to the backcountry transition and wilderness subzones.

Roads

All roads in the nonwilderness additions to the park would be closed to motor vehicles. The roads could be designated for use by hikers or stock animals only. All roads listed as open in alternatives A and B would be closed.

Climbing

Fixed-bolt rock climbing would be confined to the developed zone. No new bolted routes would be established in the backcountry transition subzone or the wilderness subzone. Replacement bolts would not be permitted except in the developed zone. All bolts would be gradually removed from the natural zone. Unaided climbing via top-rope or free climbing would be permitted on any of the routes in the park.

Climbing in the wilderness subzone would be by permit only. To reduce crowding and concentration of climbing parties and to reduce impacts to natural and cultural resources, the number of permits would be limited. Permits would be issued for specific geographic areas, and climbers would apply on a first-come, first-served basis for access to particular climbing areas. No permits would be issued for certain areas, such as the East Coxcomb Mountains, to protect the areas from climbing impacts.

Automobile Camping

Actions in this alternative would be identical to alternatives A and B. All automobile camping would be confined to designated campgrounds. This applies to the land added to the park in 1994 as well as land in the former national monument.

Group Sizes, Backcountry Camping

Limits would be imposed on the size of groups that enter different zones for overnight camping. The group size limit in the backcountry transition subzone would be 15. In the experience class A wilderness, overnight group size would be limited to 8. Group size in experience class B wilderness would be limited to 6. Backcountry camping by overnight groups would be permitted only in specifically designated and hardened sites in the backcountry transition and wilderness subzones, which would be further subdivided. Limits would be imposed on the number of parties permitted in each subdivision at any one time to minimize contacts between groups. Day users would be subject to the same group size limits as overnight users.

Area Closures

Restriction on overnight use would be maintained in the backcountry transition and wilderness subzones for the following areas:

Cultural Sites — Keys Ranch (640 acres), Lost Horse Mine Site (80 acres)

Water Sources — Lost Palms and Munsen Canyons (3840 acres), Buzzard Springs (2640 acres), Rattlesnake Spring (2640 acres), Smith Water Canyon (1280 acres), Coxcomb Adit (2640 acres), Stubbe Springs (5120 acres)

Land Areas — Wonderland of Rocks (30,053 acres), Pushawalla (7,680 acres).

The Keys Ranch site would be closed to the public except for guided tours.

Special resource protection areas would be designated where there would be no public day or night access during the summer months. The closures would protect bighorn sheep water sources during critical summer drought months. The areas are: Lost Palms and Munsen Canyons, Buzzard Springs, Forty-nine Palms Canyon, Rattlesnake Springs, Smith Water Canyon, Pushawalla, Stubbe Springs, Coxcomb Adit, Russi's Rocks Guzzler, and Coxcomb Guzzler. The acreages of these areas are the same as described for day use only areas. Russi's Rocks and Coxcomb Guzzler are 640 acres each.

RESOURCES MANAGEMENT

Artificial Water Sources

All artificial water sources in the park would be removed immediately, and new sources would not be installed. The propriety and efficacy of existing sources would not be scrutinized. This alternative would give maximum protection to backcountry and wilderness values, not maximum care to a particular species, such as bighorn sheep.

NPS *Management Policies* allows for habitat manipulation to aid a wildlife population under prescribed and limited circumstances. This alternative would remove human intrusions from the natural zone, including artificial water sources, rather than manipulate the environment.

Desert Tortoise Recovery

On June 28, 1994, the FWS adopted a recovery plan for the Mojave population of the desert tortoise. The *Recovery Plan* recommended that Federal land management agencies designate desert wildlife management areas. The *Recovery Plan* further recommends the kind of activities that may, or should not, be permitted in a management area to minimize impacts on the desert tortoise. Under this alternative, 36.9 miles of eight roads (Berdoo Canyon, Pinkham Canyon, Thermal Canyon, Thermal-Pinkham Connector, Black Eagle Mine, Grubstake Canyon, Powerline Roads east and west, and the west Eagle Mountain aqueduct access road) would not be opened. All are on land added to the park in 1994 and the first six lie in designated critical tortoise habitat.

ALTERNATIVE D – MINIMUM PROTECTION

GENERAL DESCRIPTION

This alternative would impose no new restrictions on use of former monument land, and the public could use the additional land much as they did before it was added the park. Only those recreational activities that are illegal, such as hunting or operating vehicles in wilderness, would be prohibited.

MANAGEMENT ZONING

There would be no changes in zoning from what was prescribed in the 1995 *General Management Plan*. The 234,000 acres added in 1994 would be zoned as:

Natural Zone (232,541 acres)

Preservation of natural resources and of the natural processes and only those uses that do not adversely affect these resources would be permitted.

Natural Environment Subzone (or Backcountry Transition) (100,761 acres)

The natural environment or the backcountry transition subzone is zoned for the conservation of natural resources and processes on land not designated as wilderness. In this zone, facilities could be constructed, motor vehicles could be operated, aircraft could be landed, and activities could be permitted that are not allowed in wilderness. Since this zone is also intended to preserve natural resources, however, any proposed development would have to be minor.

Wilderness (131,780 acres)

This zone is governed by the strictest preservation standards. The land in this zone would be managed for the preservation of natural resources and processes and for the preservation of its undeveloped and primeval character.

Developed Zone (498 acres)

This zone provides for the existence and maintenance of facilities to serve visitors. For the land added to the park in 1994, the developed zone consists exclusively of the roads in nonwilderness. No other developments would be planned on the added land. There would be 47.1 miles of unpaved roads designated as open, 10.2 miles more than in the proposed action alternative. All 10.2 miles of additional unpaved roads lie in nonwilderness, and the corridor would be 100 feet wide.

Special Use Zone (961 acres)

The special use zone would be the same as described in alternative A.

VISITOR ENJOYMENT

Trail System

A series of undesignated trails, some constructed but most established by passage of hikers and horses, would remain open. The trails would not be maintained, and access points would not be designated, but all trails, including those created by passage of people and stock, would be open to all uses. Trails would proliferate laterally to one another, often within short distances. Trails would develop without design or plan. All trails and routes created by this haphazard method would be designated as open for use by all hikers and horse users. Bicyclists could use all trails in nonwilderness.

Overnight campers in the backcountry transition or wilderness subzones could enter those zones at any point. No new backcountry registration boards would be installed at access points, and all existing boards would be removed. No one would have to self-register for a backcountry permit. All limits on camper nights per year in the backcountry transition and wilderness subzones would be removed.

Roads

All roads in the nonwilderness additions to the park would be designated as open. In addition to the roads listed in the proposed action alternative, the roads that would be open would include:

- Fargo Canyon Road – 2 miles
- Rockhouse Canyon Road – 7.4 miles
- Snow Cloud Mine Spur – 0.8 miles beginning at the Pinkham Canyon Road to the old Snowcloud mine area

Climbing

Climbing would be managed as one of the primary purposes of Joshua Tree National Park. Resource protection efforts that could interfere with climbing would be avoided. Installation of new bolts or the replacement of existing bolts would not be limited. Climbers could install bolted routes anywhere in the park without a permit. No area of the park, except those closed to the public, would be closed to climbing. Motorized drills would be permitted for the installation of bolts in nonwilderness areas.

Automobile Camping

Visitors could drive along any open roads and pull off within 60 feet of centerline (or 100 feet of centerline in nonwilderness) and set up overnight camps. This would be permitted along the length of any road in the developed zone. Such roads lie both in the former national monument and in the land added in 1994.

Group Sizes, Backcountry Camping

No limits would be imposed on the size of groups that enter different zones for overnight camping. Backcountry group camping would be permitted anywhere in the backcountry transition and wilderness subzones that is otherwise open to public use and that is at least 1 mile from a road and 500 feet from a natural water source. No limits would be imposed on the number of parties camping in the backcountry at any one time or on the group size of day users.

Area Closures

All restrictions on overnight use in the backcountry transition and wilderness subzones would be removed.

The Keys Ranch site would remain closed to the public except for guided tours.

RESOURCES MANAGEMENT

Artificial Water Sources

All artificial water sources in the park would be maintained without analysis. New sources could be installed with NEPA compliance but the propriety and efficacy of existing sources would not be scrutinized. Additional alteration of natural features in the park would be allowed.

Desert Tortoise Recovery

The National Park Service would take no formal action to adopt or implement any of the recommendations of the *Recovery Plan*. Joshua Tree would continue to be managed under the mandates of the Organic Act of 1916 and the Wilderness Act of 1964 and would regulate public conduct accordingly. Those regulations coincide with all but one of the recommendations of the *Recovery Plan*.

THE AFFECTED ENVIRONMENT

THE NATURAL ENVIRONMENT

CLIMATE

The Park has an arid upland desert climate. Altitude influences annual extreme temperatures. Eastern lowlands frequently have temperatures above 115ºF in the summer. The summer months typically have high temperatures, low humidity, and clear sunny days. Western higher elevations have snow and greater potential for precipitation.

Summer storms from July to September can be very dramatic. Thunderstorms from the southwest or southeast bring high winds, lightning, and heavy rain. Typical summer humidity runs below 20 percent. When storms approach, humidity can climb above 40 percent. Unless a large amount of rain falls, the humidity usually drops to normal within 12 hours. Summer storms tend to be localized. They can cause flash floods, but the majority of the annual precipitation of one to seven inches comes from winter rains.

GEOLOGY AND SOILS

Joshua Tree National Park 's picturesque landscape— mountain ranges, desert basins, and boulders seeming to float in the desert air — is all part of the mystique of the park. There are low, generally east west trending mountains interspersed with valleys, a setting characteristic of much of the western Mojave region. A consolidated rock terrain dominates the park, although unconsolidated or poorly consolidated Quaternary surface deposits largely mantle the valleys. Rocks in the park are metamorphic assemblages that include Paleozoic and Precambrian rocks, widespread Mesozoic plutonic rocks that range from gabbro to quartz monozite, and some local Cenozoic basalt. Some Precambrian rocks are more than 800 million years old. In some places, aplite and pegmatite dikes are associated with the granitic plutons. There are cryptobiotic soils in the park.

Millions of years ago the landscape had rolling hills covered with a soil mantle that had developed in a hot, semiarid to humid climate with 80 percent more precipitation and 30 percent less evaporation than is typical today. Changes in climate have resulted in present-day erosion rates that exceed the rates of soil formation. Erosion removes the soil and vegetation from steeper hillsides and creates the huge subangular and spheroidal granitic boulders and boulder piles evident at Hidden Valley, Cap Rock, Jumbo Rocks, and along the Geology Tour Road. The eroded soils are deposited in bajadas and broad channels. The channels, in turn, undergo periodic entrenchment and filling. A period of channel filling may have begun in the 1950s.

A comprehensive mineral survey has not been done. Mines in the park have produced approximately 12,000 troy ounces of gold, 16,000 troy ounces of silver, 33,000 troy ounces of by-product lead, and more than 30 tons of bismuth. Areas near the park with similar geology contain significant deposits of tungsten, manganese, uranium, and thorium-bearing minerals.

Most soils in the park are poorly developed. The eastern half of the park is mostly alluvial with no true soil structure. This granitic fill ranges from boulders to gravel and coarse sand. These are modern deposits consisting of fan gravel and other alluvium deposited by drainage systems. There are no known rare or unique soils in the park.

The prevailing winds of the Mojave and Colorado Deserts are from the west. Much of the wind-blown sand picked up in the open expanses is carried eastward and deposited in a few well-developed dune systems. Pinto Basin has extensive sand deposits but few well-developed dune systems. The only real soil formation is in the valleys of Covington Flats.

The desert soil surface is very sensitive and took hundreds of years to form. A single vehicle can cause damage that can take decades or hundreds of years to heal. During desert maneuvers in the 1940s, armored vehicles left tracks that are still visible today.

NATURAL HAZARDS

The many fault zones in the vicinity, including the San Andreas Fault to the south, cause the high level of seismic activity in the park. The trace of this fault zone, marked by the Indio Hills and numerous springs and palm oases, is clearly visible from Keys View. The oasis at Cottonwood Springs was formed as a result of fault activity, as was the Oasis of Mara, which marks the Pinto Mountain fault that extends from Twentynine Palms into the Morongo Valley. The Blue Cut fault runs from east to west through the Little San Bernardino Mountains from about 0.5-mile south of Keys view into the Pinto Basin. Two large earthquakes (magnitude 6.4 and 7.5) were recorded in 1992 along the Mojave/Landers line, a north-south trending fault perpendicular to the Pinto Mountain fault.

Flash floods are an additional natural hazard. Floods can occur in all of the drainages in the park. Surface flows in most drainages may result from heavy precipitation, primarily during summer storms, and last only a few hours or days.

VEGETATION

The vegetation in the area varies with the topography, elevation, and gradient. It is estimated that more than 850 plant species live in the park (Adams 1957). Below 3,000 feet, creosote bush, mesquite, yucca, ocotillo, and species of cactus dominate the Colorado Desert (or low desert). Whenever moisture conditions are favorable, cat's claw, palo verde, and desert willow may also appear. In Pinto Basin, creosote bush, white burroweed, several species of grass, and many species of cactus grow. Occasional sand dunes or basins of loose sand provide a rare habitat in this desert most often dominated by annual grasses following spring rain.

Above 3,000 feet, three basic vegetation associations have been classified: Mojave mixed steppe — Joshua trees, galleta grass, needle grass; Blackbrush scrub — blackbrush, Mojave yucca, Joshua tree, California juniper; and Mojavean piñon/juniper woodland — piñon pine, scrub oak, California juniper. The Mojave Desert is biologically more diverse than the Colorado Desert, probably due greater precipitation. In the Mojave, mixed steppe densities of Joshua trees vary dramatically. The thickest forests are in Covington Flats, Lost Horse, and Queen Valley areas.

The transition zones between the two deserts provide for an increased biodiversity. Common shrubs such as desert senna, bladder pod, jojoba, desert mallow, paper bag bush, encelia, vigueria, white ratany, and four-o'clock typically dominate them. Other shrubs in these areas include jimsonweed and coyote melon. After adequate rainfall, the deserts can be transformed by colorful wildflower displays — including extensive areas of Bigelow coreopsis, sand verbena, phacelia, evening primrose, blazing star, pincushion, chia, and others. Fan palm oases also appear in the park, primarily in the Colorado Desert portion in the Cottonwood area. A few groves are in the southwest portion of the Mojave Desert, close to Indian Cove and at the headquarters at Twentynine Palms.

WILDLIFE

Large mammals in the park include desert bighorn sheep, mule deer, and mountain lion. Bobcats are common, as are many small animals. Approximately 350 vertebrate species inhabit the park. The most common are mice and wood rats, white-tailed antelope squirrel, chipmunk, coyote, black-tailed jackrabbit, and two species of fox. There are approximately a dozen species of bats. Invertebrates are also common, but little has been done to systematically inventory them. Two poisonous spiders are found — the black widow and the brown recluse. Another common spider is the nonpoisonous tarantula. Scorpions in the park range up to four inches in length and are among the less toxic varieties. Various centipedes, millipedes, and ticks can be found along with a multitude of other insects, including ants, beetles, dragonflies and wasps.

Only the red-spotted toad and the California tree frog have been reported. Of many small lizards present, the side-blotched is the most common. Additionally, there are 2 horned lizards and 12 other species. There are 20 known species of snakes in the park.

Large numbers and varieties of birds (more than 270 different species) live in or fly through the park, which is adjacent to a major migratory flyway in the Coachella Valley. During stormy weather, many areas are critical stopover sites for species such as loon, herons, egrets, grebes, and avocets. Birds most commonly seen in the park are the Gambel's quail, black-throated sparrow, scrub jay, common raven, roadrunner, and several wrens. Additionally, the park hosts both summer and winter migratory species. The oases seem to be important stopping places on the western flyway and have semiannual visits of large numbers of turkey vultures.

SPECIES OF SPECIAL CONCERN

The following is a list of endangered, threatened, and candidate plant and animal species that may exist in Joshua Tree National Park. This list was included in a letter dated February 28, 1998, from the FWS. The species listed are known to occur in the park.

Vegetation

One plant species is listed as endangered, the Cushenberry milk-vetch (*Astralegus albens*). The following plants are proposed endangered (PE) or proposed threatened (PT):

- Munz's onion (*Allium munzii*) — PE
- Triple-ribbed milk-vetch (*Astragalus tricarinatus*) — PE

- Pierson's milk-vetch (*Astragalus magdalenae* var. *piersonii*) — PE
- Nevin's barberry (*Berberis nevinii*) — PE
- Thread-leaved brodiaea (*Brodiaea filifolia*) — PT
- Parish's daisy (*Erigeron parishii*) – PT

Two additional species are included below, but are not on the FWS list but are of special interest to the National Park Service. These include the Joshua tree (*Yucca brevifolia*) and the California fan palm (*Washingtonia filifera*).

Wildlife

The following are the endangered (E) or threatened (T) Federally-listed animal species that may live in Joshua Tree National Park:

- Southwestern willow flycatcher (*Empidonax traillii extimus*) — E
- Peregrine falcon (*Falco peregrinus*) — E
- Unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*) — E
- Bald eagle (*Haliaeetus leucocephalus*) — T
- Desert tortoise, Mojave Desert population (*Gopherus agassizii*) —T
- Coachella Valley fringe-toed lizard (*Uma inornata*) — T
- Least Bell's vireo (*Vireo bellii pusillus*) - E

The following species are proposed endangered or threatened or candidate species (C):

- Peninsular bighorn sheep, which is not known to occur in the park (not to be confused with the unlisted desert bighorn, Ovis canadensis nelsonii, which is common in the park) – PE
- Mountain plover (Charadrius montanus) - C

Of the species listed, the desert tortoise is known to inhabit areas affected directly by the Federal actions considered in this plan. The park's population is estimated at approximately 12,700 animals. Tortoise densities range from zero in rugged mountains to 240 per square mile in the Pinto Basin. Most areas of the park contain tortoises.

Other sensitive species meriting conservation/management efforts include:

- Greater western mastiff-bat (*Eumops perotis californicus*)
- California leaf-nosed bat (*Macrotus californicus*)
- San Diego horned lizard (*Phrynosoma coronatum blainvillii*)
- Pinyon rock cress (*Arabis dispar*)
- Crucifixion thorn (*Castela emoryi*)
- California ditaxis (*Ditaxis californica*)
- Foxtail cactus (*Escobaria vivipara* var. *alversonii*)
- Little San Bernardino Mountains gilia (*Gilia maculata*)
- Spearleaf *(Matelea parvifolia*)
- Robison's monardella (*Monardella robisonii*)
- Salt spring checkerbloom (*Sidalcea neomexicana*)
- Mesquite nest straw (*Stylocline sonorensis*)

WATER

Groundwater follows zones of least resistance along deeply fractured rock masses and deep loose gravel. There are very few known water tables near the surface. By far, the largest amount of groundwater is in the Pinto Basin, one of the extensively alluvial valleys underlying the eastern portion of the park. The U.S. Geological Survey estimates that this basin could yield 300,000-acre feet per year of water in the upper 100 feet of the saturated zone.

More than 120 known water sources, including springs, seeps, wells, and one short perennial stream, occur within the park. Flows from springs and seeps range from seasonal dampness to about seven gallons per minute. The majority of the springs flow from fractures and joints in the igneous and metamorphic basement complex and appear to be supported by local aquifers. Past monitoring indicates that discharge at some springs may be decreasing. The cause is uncertain and may be attributable to climate change, changes in vegetation, sampling error, water pumping and use, or natural variation.

Several oases, encircled by California fan palms, are found in the park and provide a dramatic contrast to their surroundings. These oases symbolize the importance of water in shaping the landscape and sustaining life in the desert.

Three artificial impoundments (Barker Dam, Cow Camp, and Keys Lake) contain significant amounts of water most years. These dams were constructed to supply water for ranching and are now considered eligible for listing on the National Register of Historic Places. The dams also provide an artificial source of water for native and exotic wildlife.

Flash floods can occur in all of the drainages in the park. Surface flows in most drainages may result from heavy precipitation and last only a few hours or days. Though most visitor facilities (with the exception of headquarters) appear to be outside major floodplains, no formal studies have been conducted. Many flood-prone drainages cross park roads.

The State of California recognizes both appropriative and riparian water rights. Appropriative water rights are considered property rights where the party who first appropriates the water and applies it to a beneficial use has a prior right of use against other appropriators. Riparian rights are associated with lands adjacent to a stream or other body of water. They include the right to divert and use water on the land, but not to store it. Riparian rights also cannot be lost due to non-use. The United States is entitled to riparian rights the same as any other landowner. However, for non-reserved lands, the riparian rights of the United States are subordinate to the rights of appropriators established under State law (Dunning, 1991).

California separates ground water into "percolating" ground water, or water that flows in a known and definite channel or is the underflow of a stream. The second case requires a Statement of Water Diversion and Use for a riparian use (use overlying land) or a permit for an appropriative right (use not overlying on land) (Johns, 1993). If the water is considered percolating, the California State Water Resources Control Board has no jurisdiction over the water withdrawal.

The United States is entitled to Federal reserved water rights for portions of the park which have never been out of the public domain or Federal ownership. The quantity of water reserved would be that amount necessary to accomplish the purposes for which the land was reserved. Joshua Tree National Monument was established on August 10, 1936 to protect various objects of historical and scientific interest (Proclamation 2193, 50 Stat. 1760) and was enlarged on September 25, 1950 (64 Stat. 1033). Joshua Tree would have Federal reserved

water rights with these priority dates for National Monument purposes. On October 31, 1994, the California Desert Lands Protection Act of 1994 enlarged and redesignated Joshua Tree as a National Park. Federal reserved water rights for wilderness and expanded park purposes are addressed in this Act and these new rights would have a priority date of October 31, 1994.

Public Water Reserve 107 (Executive Order of April 17, 1926) ordered "that every smallest legal subdivision of the public land surveys which is vacant, unappropriated, unreserved public land and contains a spring or water hole located on unsurveyed public land be, and the same is hereby, withdrawn from settlement, location, sale, or entry, and reserved for public use..." Joshua Tree may be entitled to Federal reserved water rights for springs and other water sources with priority data of April 17, 1926.

All natural water sources, including seeps and springs, are essential to the purpose for which the monument was originally reserved in 1936 and 1950 and the purpose for which the park was created in 1994. Although there are no natural free-flowing streams or other bodies of water in the park, the springs, seeps, and intermittent natural storm flows are necessary to maintain the natural system values of vegetation, wildlife, and scenery that are the fundamental purpose of the reservation. Without the presence of such water, the biotic components would wither away, and the historic elements would lose integrity. Without all such water, the purpose of the park reservation would be entirely defeated.

Quality of both ground and surface water is essentially unaffected by sources outside of the park since the majority of the land is at a higher elevation than its surroundings, and no water flows in from outside sources. There have been documented increases in metal contaminants in ephemeral pools created by seasonal rainfall. This is probably due to an increase in airborne pollutants.

AIR QUALITY

The wilderness area of Joshua Tree National Monument was designated as a class I airshed by the Clean Air Act (CAA) amendments of 1977. Under the CAA amendments of 1990, any addition to a class I wilderness is also made part of the class I area. Thus, the 1994 additions to the Joshua Tree wilderness are class I areas. This classification allows the least incremental increases in particulate and sulfur dioxide pollutants. The CAA also imposes an affirmative responsibility to protect the air quality related values (including visibility) of class I areas. Federal land managers have an "affirmative responsibility" to air quality related values in their class I areas. These values include visibility, terrestrial and aquatic flora and fauna, and historic and archeological resources.

Joshua Tree National Park is located within both the Mojave Desert Air Quality Management District (MDAQMD) and the South Coast Air Quality Management District (SCAQMD). The Joshua Tree portions of MDAQMD and SCAQMD currently exceed Federal and state ozone standards and state particulate matter standards. They are also expected to exceed the new fine particulate matter standards as well as the new 8-hour ozone standard.

Joshua Tree National Park has had some of the highest recorded levels of ozone for a national park. The ozone level exceeded the national standard of 125 parts per billion (ppb) for ozone 9 times during 1997 and 17 times during 1998, and it exceeded the California standard of 95 ppb 54 times during 1997. Both nitrate and sulfate wet deposition are high when compared to other parts of California. The annual average for nitrate and sulfate in

Joshua Tree National Park in 1997 were 4.24 micrograms per cubic meter ($\mu g/m^3$) and 1.25 $\mu g/m^3$, respectively. Joshua Tree National Park has exceeded the standards for NOx emissions during 1997 and 1998 and currently has the worst air quality for a park unit in the National Park system (more days exceeding standards for several air pollutants and haze than any other National Park).

Summer months have the worst levels, and visibility is frequently impaired. During the winter, air quality is generally better when the prevailing airflows are not from the Inland Empire and Los Angeles Basin. The San Gorgonio and San Jacinto Mountains can form a barrier to the air pollution from Los Angeles with pollutants filtering in from the southwest to northeast.

Very small amounts of air pollutants are generated in the park and are primarily from automobiles and dust on roads. Automobile exhaust and emissions from diesel generators contribute only minor amounts of pollutants. Vehicle traffic on park roads, especially the unpaved roads, is very light and probably only contributes slightly to particulate emissions. The National Park Service removed two diesel-powered generators from the remote Cottonwood facility and replaced them with a 21-kw photovoltaic power system. The National Park Service's motor vehicle fleet is phasing in compressed natural gas and electric-powered vehicles.

Visibility is a significant air quality-related value of Joshua Tree. The park contains several magnificent desert vistas, such as a 360º panorama from Ryan Mountain. Many subtle earth colors are displayed in the desert. The beauty of the mountains, basins, and rocks depends on perceptible differences in contrast, texture, and color. Standard visual range averages 50 miles and is highest during the winter, lower during fall and spring, and lowest during summer. While natural levels of desert haze associated with fine dust particles is frequently mentioned in historical literature, there is little doubt that most current visual degradation results from human-caused sources.

The park offers a night sky unpolluted by urban lights so that visitors may see the stars as earlier generations viewed them. The brilliantly lit Milky Way, meteor showers, or the colorful glimmer of nearby planets can be seen.

WILDERNESS

Wilderness is, itself, a resource. The Joshua Tree wilderness of nearly 600,000 acres is the largest such area near the urban complexes of southern California. The wilderness offers visitors an opportunity to see an area that is predominantly free of roads, buildings, development, powerlines, and many of the visual intrusions associated with modern life. Remnants of ranching and mining can be found along with the abandoned roadbeds. Wilderness offers solitude, tranquility, quiet contemplation, and freedom to study a place that is substantially unaffected by human activity.

Joshua Tree National Park contains several wilderness units, such as the outstanding geologic area that encompasses the rugged Wonderland of Rocks, a display of gigantic monzonites. The elaborately jointed and eroded quartz monzonite covers several thousand acres. The Wonderland of Rocks is not traversed by any trail; even experienced hikers could easily find themselves disorientation travelling cross-country. Many of the park's most popular climbing routes can be found in the Wonderland of Rocks.

A large portion of the Little San Bernardino Mountains, a magnificent erosional diplay, that possesses a fine desert plant community and the Nelson bighorn sheep range comprises another wilderness unit. This unit spreads from the rugged mountains along the west boundary and extends to the Geology Tour Road. It encompasses such features as Covington Flats, which contains some of the largest Joshua trees in the park, and Quail and Stubbe springs, which serve as water sources for the park's wildlife. Lost Horse Valley, a flat, broad expanse that showcases Mojave desert vegetation, is also found in Wilderness Unit 2, as is another portion of the Little San Bernardino Mountains that forms the backdrop for Lost Horse and Pleasant Valleys.

The expansive Wilderness Unit 3 comprises a large section of the Hexie Mountains, which form a scenic horizon for Pleasant Valley. The major portion of the Hexie Mountains provides the background for Pinto Basin, Pleasant Valley and comprises part of the bighorn sheep range. Again, this wilderness unit showcases Mojave desert vegetation, and the south-facing slopes of the Hexie Mountains support an extravagant display of barrel cactus.

Wilderness Unit 4 contains a small portion of the Cottonwood Mountains and features the Colorado desert vegetation, a subsection of the Sonoran desert. The broad expanse of the Pinto Basin makes up Wilderness Unit 5. The Pinto Mountains to the north form a panoramic backdrop for the Basin. The sheer size of the basin quickly dwarfs man. The encircling mountains and starkness of the basin, void of evidence of man, form lasting impressions of a desert environment. A low ridge of sand dunes bisects the western part of the basin.

The Eagle Mountains to the south of the Pinto Basin contain draws and washes that contain some of the finest palm oases in the park. These unique mountains share vegetation common to both the higher, cooler Mojave and the lower, drier Colorado deserts. Native palm trees can be found growing next to the higher-country junipers. This Wilderness Unit 6 is an excellent example of the transition zone that melds the two great deserts together.

Wilderness Unit 7 found in the arid northeast section of the park encompasses some of the most remote, least traveled areas of Joshua Tree National Park. The Coxcomb Mountains with their display of majestic, craggy peaks enclose the northeast section of the Pinto Basin.

The California Desert Protection Act of 1994 added several sections of wilderness (figure 3). These new desert areas completed the ecological units in the Coxcomb and Eagle Mountains and provide added protection to the park's wildlife, particularly the threatened desert tortoise and the bighorn sheep.

NATURAL QUIET

In many parts of the park, the dominant sounds are of wind, rustling vegetation, and animal calls. In a study of ambient sound pressure levels (SPL) in the California desert in 1979, researchers found that naturally occurring sounds ranged from 14 "A-weighted decibel scale (dBA) on a still morning with minimal biotic activity to a high of 66.0 dBA at wind speed of 15 to 25 km/hr. In general, the desert is a quiet place; more than 90 percent of the measured natural SPL's did not exceed 45.5 dBA and none of the animal sounds that were measured produced sounds greater than 56.0 dBA. More than 90 percent of animal sounds were below 50.5 dBA (Bondello and Brattstrom, 1979).

Much of the park, especially the more remote wilderness, is free of machinery, motor vehicles, and associated noises, but even in the remote places, natural quiet is broken by

overflights of low-flying military aircraft and the higher commercial airlines. Quiet is also threatened on a more sustained basis by proposals for large-scale developments on the boundary, such as the Eagle Mountain landfill.

CULTURAL ENVIRONMENT

ARCHEOLOGY

Joshua Tree National Park has been the focus of sporadic archeological investigations for more than 60 years, but the sequence of prehistoric human occupations is still imperfectly understood. Fluted projectile points of the Paleo-Indian period have been found in the region. These artifacts are thought to be associated with a tradition of big-game hunting that may date back to 9000 B.C. Artifacts of a slightly later period, the early Archaic, which include those of the Dieguito and Lake Mojave complexes, were also found in the region. There may be evidence at Joshua Tree National Park of Paleo-Indian or early archaic occupations.

There is good evidence of human occupation from the Middle and Late Archaic periods, which together range from 3000 B.C. to A.D. 1100. Artifacts of the Pinto complex dating from about 3000 B.C., such as Pinto projectile points, are well known by archeologists. They come from the Pinto Basin type site and from other sites in the park. Type sites are those with distinguishing characteristics of an identified and defined cultural complex. Patayan occupation or influence from the lower Colorado River region, associated with brown and buff ceramics, may have begun as early as 750 A.D. in what is now the park. Fitting the archeology into categories like Middle Archaic or Patayan assumes significant changes in lifeways, economy, and social organization. A more useful model is the Desert Culture or Desert Archaic, an early, successful, and long-lasting adaptation to desert living. This mode of living is presumed to have been characterized by small, mobile bands and by participation in a mixed hunting and gathering economy. Although milling equipment, the bow, ceramics, and perhaps even horticulture were added to the culture over time, the basic configuration of the culture may have remained relatively stable.

After about 1000 A.D., occupation of the area increased considerably, judging from the frequency of sites that date within the last thousand years. At the time of European contact, the boundaries of three American Indian groups — the Cahuilla, Chemehuevi, and Serrano — intersected at points now in the park. The descendants of these Indian groups continue to live in the area.

HISTORY

Exploration, cattle raising, homesteading, and mining took place in what is now the park. The first European to enter the area was a Spanish army officer, Pedro Fages, commander of California's Spanish forces, who described the date palms, probably Joshua trees, that he saw as he crossed the Mojave Desert in 1772. There were more Spanish expeditions in the area in 1774 and 1776. The southern periphery of the present park was briefly explored from December 1823 through January 1824 by Captain Jose Romero, representing the government of Mexico, who was dispatched to find and evaluate for overland travel the east-west Cocopa-Maricopa Trail from San Bernardino to the Colorado River. This route of Cocopa-Maricopa Indians was one of the major pre-European contact Indian trails in the

area. Another such trail was the Mojave, located farther north, which also extended from San Bernardino to the Colorado River, connecting with north-south trails along both banks of the river.

Jedediah Smith made an overland journey to California in 1826. He was a fur trapper with the Rocky Mountain Fur Company who visited the Mojave Indian villages along the Colorado River and trekked westward over the Mojave Indian trail toward the Pacific Ocean. There were few other early expeditions in the 1830s and 1840s. During the gold strike of 1849, gold seekers from the east passed through on their way to central California.

In 1865, the first mining claim in what became the park was filed for the Jeff Davis mine in Rattlesnake Canyon. Mining, mostly for gold, continued in or near the park into the 1960s. Mining over the years brought adits, diggings, shafts, equipment, structures, and roads to the landscape. It also added sources of water as wells were dug or pipelines were constructed from water sources to process ore. As many as 3,000 shafts or other diggings remain.

The first attempts at cattle raising took place in the area in the early 1860s in the Mojave where stockmen grazed large numbers of cattle in the desert and along the river or wash bottoms in the winter. The high desert had reliable grazing. The galleta grass and succulent saltbushes provided good browse in the winter and spring. The first stockman to graze cattle in what is now the park apparently was Oliver Smith, whose Texas longhorns grazed near Quail Springs from about 1870-1876.

Cattle raising peaked during the 1920s, about when local homesteading was beginning. Grazing continued through the 1940s and may have lasted longer. William F. Keys (1879-1969), who was an entrepreneur, miner, and rancher, lived most of his life on the homestead known as the Keys-Desert Queen Ranch. He is known to have maintained a cattle herd of about 100 head in the early 1940s. He stayed on the ranch until his death in 1969 and may have had some cattle into the 1960s.

Cattle raising (which included open-range grazing, ranching with corrals, fences, and even some rustling in the hidden canyons and valleys) brought dams, reservoirs, and wells plus buildings and other structures that often revealed a highly individualistic, entrepreneurial adaptation to the desert. Evidence of ranching remains at several sites, including Keys Ranch (the Desert Queen Ranch).

ETHNOGRAPHY

The ethnography and ethnohistory of Joshua Tree National Park involves the traditional life and cultural history of three American Indian groups who lived in the area at the time of European contact. The territories of these groups — the Cahuilla, Chemehuevi, and Serrano — met at a point now in the park. They were mostly hunters and gatherers, although each group also practiced some horticulture. Other groups such as Mojave and Maricopa traders east of the park regularly passed through on treks back and forth to the coast.

The Cahuilla, Chemehuevi, Mojave, and Serrano tribes maintain strong interest in the park. The Agua Caliente band of the Cahuilla Indians, the Cahuilla Tribe of the Morongo Indian Reservation, the Fort Mojave Indian Tribe, the Chemehuevis and Mojaves of the Colorado River Indian Tribes, the Serrano Tribe of the Morongo Indian Reservation, and the Twenty-nine Palms band of Mission Indians are in regular contact with the park. The Indians have requested permission to gather plants for food, medicine, and personal (not commercial)

crafts; meditate and pray in sacred areas; or study the archeological and ethnographic artifacts in the Campbell collection and other park collections to confirm more of their heritage and pass it on to young people.

The American Indian Religious Freedom Act (42 USC 1996) states that *"henceforth it shall be the policy of the United States to protect and preserve for American Indians their inherent right to freedom to believe, express, and exercise the traditional religions of the American Indians, Eskimos, Aleut, and Native Hawaiians, including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites."* This statute does not create additional rights or change existing authorities. As a matter of policy in keeping with the spirit of the law, however, the National Park Service will be as unrestrictive as possible in permitting Native American access to and use of traditional sacred resources for customary ceremonials, provided that such use does not cause permanent damage to the integrity of the resources.

The California Desert Protection Act (section 705) provides that "upon the request of an Indian tribe or Indian religious community," the National Park Service "shall temporarily close to the general public use of one or more specific portions of the park system unit or wilderness area in order to protect the privacy of traditional cultural and religious activities in such areas by Indian people. Any such closure shall be made to affect the smallest practicable area for the minimum period necessary for such purposes." Congress has conferred this authority only upon a handful of Federal land areas throughout the nation (California Desert Protection Act, El Malpais National Monument and Conservation Area [New Mexico], and the Jemez National Recreation Area [New Mexico]).

The California Desert Protection Act directs that the Secretary of the Interior "shall ensure access to . . . park system units and wilderness areas by Indian people for . . . traditional cultural and religious purposes." The act also states that if access is required in a wilderness area, such access will be "consistent with the Wilderness Act."

ARCHEOLOGICAL SURVEYS AND HISTORICAL STUDIES

There have been about two dozen archeological surveys conducted in the park, ranging from early exploratory work in the 1920s and 1930s to more recent small-scale, development-oriented surveys. A recent survey of 75 miles of road corridor provided a lengthy transect of the various environmental zones of the park (Erwin 1985), but less than 10 percent of the

park has been surveyed systematically to modern standards. As of 1989, 250 archeological sites had been recorded. Many historical studies have been completed.

Types of Sites

Archeological sites of all periods tend to be small and usually are not obvious. Most frequent are the remains of small campsites. These are found often as eroded open sites, more rarely as buried open sites — such as the remains at the Oases of Mara — and occasionally as rock shelter sites. Sites are marked by scatters of chipped stone, ground stone, and infrequent ceramic shards. There may also be small rock rings, rock alignments, cairns, bedrock mortars, and grinding sticks. The presence of midden (dark, organic, and artifact-rich deposits) has been noted. A considerable amount of rock art has been recorded in the park. Artifact caches, remnant trails, and quarries of chippable stone are occasionally found.

The historic Euro-American sites, including ranches, homesteads, and mines, probably have archeological components. These probably include trash dumps, buried structures, unrecorded features, and other aspects that should be investigated.

National Register Status

Six historic period sites have been placed on the National Register of Historic Places: Barker Dam, Cow Camp, Desert Queen Mine, Keys-Desert Queen Ranch, Ryan House and Lost Horse Well, and Wall Street Mill. Twentynine Palms Oasis (Oasis of Mara) as an archeological and historical site and six additional historical sites have been formally determined to be eligible for the national register: Cottonwood Oasis, Eagle Cliff (Black Eagle) Mine, Eldorado Mine and Mill, Lost Horse Mine and Mill, Pinyon Mountain Historic Mining District, and Pinto Wye Arrastra. All national register sites or sites determined to be eligible for listing on the national register are in the old national monument part of the park. No sites or districts that are solely archeological have been formally determined to be eligible for listing on the national register.

REGIONAL AND ADJACENT LAND USE

The proximity of Joshua Tree National Park to the Los Angeles metropolitan area and to a large military base generates a steady flow of visitors. The recreational demands of southern California are enormous. For people who are subjected to automobile congestion, air pollution, and disappearing open space, the desert offers rest and relaxation, fresh air, clear skies, outdoor recreation, solitude, and contemplation. Many return frequently for specific recreational activities.

Some people has traditionally viewed California desert environments as wastelands, and the park has been damaged and abused because many users are not aware of their fragile nature. The counties within a 100-mile radius of the park include Los Angeles, Orange, Riverside, San Bernardino, Imperial, and San Diego. These counties contain more than 18 million people, and the population continues to grow. Over 10 million acres of Federal and state land in these counties are available for recreation.

Some land adjacent to the park has been subdivided into small desert communities for homesites. Morongo Valley, which parallels most of the park's north boundary, is almost completely subdivided into homesites and desert homesteads. Other desert homesites extend along the southwestern boundary along the foot of the Little San Bernardino Mountains. Several new large developments, which abut the southern boundary of the park at the outlets of Fan and Deception Canyons, are being proposed. Farther to the south lies the Coachella Valley, an irrigated agricultural area of date palms, vineyards, and citrus groves. The valley is also the site of Palm Springs, Palm Desert, Rancho Mirage and other internationally recognized destination resorts. The mountainous portions along the boundaries are largely in the public domain, where the primary use is vehicle-oriented recreation and BLM-administered wilderness (Sheephole) and one area of critical environmental concern (Big Morongo). The largest area of mining claims and associated mining-related disturbance near the park is the Eagle Mountain Mine area, which is in a salient that is surrounded on three sides by the park. The mine area is now the subject of a reclamation proposal for a municipal solid waste landfill.

The proposed landfill would include the open mining pits and nearby canyons in the Eagle Mountain mine area. Its proximity poses some obvious threats to the adjacent wilderness. Blowing trash, dust, noise, and introduction of exotic plants and insects could impair the fragile setting. The operations would present other, less obvious, threats to the natural ecosystem. Household trash attracts scavengers such as ravens and coyotes, which can flourish in such a setting. Ravens are known to prey on young tortoises. The largest known population of tortoises in the park is within six miles of the proposed landfill.

Urbanization and incompatible land uses along the boundary can cause profound deterioration of resources. Examples include air pollution, groundwater pumping and depletion, noise and light pollution, alteration of natural systems along the boundary, incursion of domestic pets in to the park, and visual intrusions.

VISITOR USE

ACCESS AND CIRCULATION

Access to Joshua Tree National Park is from two major east-west transcontinental arteries. Visitors enter directly from Interstate 10 through the Cottonwood entrance by exiting 24 miles east of Indio and traveling north 1 mile to reach the south boundary. Travelers from the west on Interstate 10 leave the freeway at State Route 62 - 16 miles east of Banning and travel north and east to the towns of Yucca Valley, Joshua Tree, and Twentynine Palms. Travel is over four-lane paved highways.

The park is linked to Interstate 40 through Amboy, 50 miles to the north. Travel from Los Angeles, 120 miles to the west, is over Interstate 10 and State Route 62. The latter route extends east to Parker, Arizona, on the Colorado River.

Visitors traditionally enter the park through one of several park roads, some of which connect with paved roads in the park. The four paved road entrances account for almost all of the total visitation, with about 70 percent using the Joshua Tree (west) and Twentynine Palms entrances.

Circulation through the park is over 289 miles of roads, 80 miles of which are paved. With the exception of the 5 miles of road in Indian Cove, Black Rock Canyon, and Fortynine Palms area on the north side of the park, all paved roads in the park are connected.

VISITATION

The deserts of California have experienced dramatic human development in the last 50 years. Joshua Tree National Park lies within a 3-hour drive of more than 18 million people. Increased populations have meant increased visitation. The park is 120 miles east of Los Angeles.

Visitation in the park has steadily increased since 1993 to more than 1.4 million visitors in 1998. The change in designation from national monument to national park has expanded attention on the park from a regional to national context. In the past, weekend visitor use by local and regional residents dominated the visitor use patterns. Now, however, greater numbers of the traditional, family-oriented park users from around the nation come to Joshua

Tree National Park as a destination. International visitors comprise an every-increasing percentage of park visitors. Peak visitation occurs during the months of March, April, and May, when 38.9 percent of the people come to the park. About 24 percent of the visitors come during the fall (September through November), 22 percent in the winter (December through February), and 16 percent in the summer (June through August)

VISITOR ACTIVITIES

Despite the fact that Joshua Tree is largely a frontcountry day use destination for most visitors, backcountry use has also increased in recent years (recorded by backcountry camper nights). Activities include hiking, picnicking, rock climbing, interpretive walks and talks, and camping. Only about .5 percent of all of the park visitors spends the night in the park's backcountry. Bicycling has been permitted on public roads, both paved and dirt. The park offers an extensive network of dirt roads that make for less crowded and safer cycling than the paved main roads.

Outstanding opportunities for hiking and exploring on the park's trail system and cross-country exist. The closer examination of two desert ecosystems by foot reveals a fascinating variety of plants and animals. Trails range from the relatively easy nature trails to the longer 16-mile Boy Scout Trail or the strenuous 7.5-mile Lost Palms Oasis. Trail. Cross-country possibilities abound. "Bag peakers" can hike 10 mountains over 5,000 feet in elevation. Other popular attractions include the park's oases and a wide variety of remnants of the gold mining era.

The most intensively used backcountry and wilderness areas in the park are in Hidden Valley and the Wonderland of Rocks. These areas provide some of the most popular and diverse rock climbing in the United States, and accessibility to most of the area by car and foot is excellent. Massive boulders and rock outcrops make Joshua Tree National Park a world-renowned rock climbing area. Its reputation brings climbers from throughout the world to the park. Skilled and novice technical rock climbers are attracted to the climbing opportunities. Approximately 5,400 routes exist on 700 rock formations that are concentrated over about 100,000 acres. These formations vary in size and can support from one to 40 different climbing routes.

Equestrian use occurs mainly in the western and higher elevation portions of the park. Numerous trails, created by the passage of stock, criss-cross the area. Most of these trails originate from the Black Rock horse camp, Ryan Mountain horse camp, and the Covington Flats area of the park.

On the new land added to the park in 1994, past recreational use relied heavily on operating four-wheel drive vehicles along a series of unpaved roads and then driving to isolated destinations along those roads for camping. The areas are marked by a system of roads and tracks, associated soil denudation and compaction, and abandoned fire rings and trash. The area was also open to hunting and discharge of weapons. These traditional recreational uses are no longer permissible. Some users continue to operate vehicles in wilderness along desert washes and old roads. Closure signs are often ignored and physical barriers have been surmounted.

DERIVATION OF IMPACT TOPIC

To focus on the most significant impact topics, the issues, alternatives, and impacts were evaluated throughout the planning process. All impact topics, including those raised by the public, were evaluated by the National Park Service and narrowed to include only those of significant environmental concern.

Not analyzed for impacts were climate, natural hazards, biosphere reserve status, external land use, water quality, and water rights where the alternatives would have little or no impact.

Air quality problems in Joshua Tree are associated with the regional airshed, which contains the second largest population center in the United States. Dust from park roads is not significant in comparison to the regional air quality issues. Although visitation is projected to increase, no proposals under any alternative would significantly alter air quality. Impacts to the surrounding communities from the proposed actions in this plan would be minimal and are not further analyzed.

ENVIRONMENTAL CONSEQUENCES

IMPACTS ON NATURAL AND CULTURAL RESOURCES AND VISITOR EXPERIENCE

NEW PROPOSED ACTION (ALTERNATIVE E)

DESIGNATED TRAIL SYSTEM

This new proposed action would reduce impacts to vegetation and soils by designating a system of trails for hikers, bicyclists, and equestrians. Impacts would be concentrated upon a hardened or defined trail tread. All social trails not designated as open and part of the trail system would be closed and restored to a natural condition using native vegetation to reduce impacts to the natural resources. A "corridor" concept would be introduced as a trail designation. The corridors would use minimum impact strategies and would not require development of trail tread. Trail corridors would be specifically defined routes of travel that would follow natural terrain, such as canyons, washes, and natural passes. Trail corridors would reduce impacts to soils and not require trail maintenance. If conflicts between user groups occurred, trails and corridors could be closed or trails could be rerouted.

The new proposed action would discourage the proliferation of social trails. Obtaining a backcountry permit would be made easier by adding another backcountry self-registration board and by providing for phone-in permits. Access to remote areas of the park from outside the park boundary would be made easier by eliminating the requirement to park at a backcountry self-registration board.

Equestrian

The new proposed action would restrict equestrian use to only designated trails and trail corridors, totaling approximately 274.5 miles, rather than the existing standard of designated trails and all active washes. Alternative E would include approximately 3.15 miles in addition to the number designated in Alternative A. Trails and corridors would traverse open lands, canyon bottoms, and dry washes. Equestrian staging areas for day and overnight use would be confined to existing disturbed areas within the developed zone. Equestrian trails and corridors would be concentrated in the higher Mojave Desert, ranging in elevation from 2,000 feet to 4,500 feet.

Impacts to soils and vegetation would occur along the trail tread in the form of soil compaction, troughing, and trampling of vegetation. In the event a species of concern is found to be significant along the trail tread, rerouting, temporary closure, or signing the trail would be implemented. Restricting equestrian use to designated trails and corridors, however, would eliminate the proliferation of social trails and therefore confine and reduce associated resource impacts to a small percentage of the park. Overall care and maintenance of the park's trail system would increase.

Confining stock to specified trails and corridors could negatively affect the equestrian experience, but the provision of a better protected and less impacted resource would enhance

the stock users' park experience. This alternative presumes that the equestrian is interested in preserving the quality of the park so that it remains a beautiful place to enjoy horseback riding.

Bicycles

A total of 29.25 miles of trails would be designated as open to bicycle use. Bicycle trails follow old mine roads with the exception of a 7-mile section of the California

Riding and Hiking Trail between North Entrance and the Pinto Basin Road and the Lost Horse Valley Trail that connects Ryan Campground and the Echo "T" intersection.

A short segment of the Berdoo/Thermal bicycle trail, approximately .5 miles, would be re-routed around wilderness. The new re-routed segment, approximately .67 miles, would follow the path of least impact over the shortest distance to clear wilderness lands. Impacts to natural resources would be minimal. No removal of large plants, such as Joshua trees or Mojave yuccas, would occur. Some small shrubs would be trimmed or removed. The re-routed area has been surveyed for the desert tortoise, and no significant impacts to the desert tortoise would occur.

Any potential impacts to the desert tortoise from equestrian and bicycle use would be mitigated by restricting travel to designated trails, developing a trails brochure, posting signs at trailheads and specific areas of concern, and using volunteer monitors. Continued monitoring and surveys for the desert tortoise would occur.

Stock Use

The plan also designates horse and mules as authorized stock for use in the park. The use of horses and mules as a means of travel has a long and established tradition of historical use in the west. At the discretion of the Superintendent, a study and associated environmental analysis about the implications and appropriateness of introducing llamas as stock animals in Joshua Tree National Park could be initiated. The primary focus of such a study would be resource protection and consistency with the National Park Service mission.

DESIGNATION OF OPEN ROADS

This alternative would establish 37.7 miles of road corridors as part of the developed zone. Limiting the number of roads that remain open would reduce the impacts to vegetation and soils along roadways. All roads that would remain open are pre-existing four-wheel drive roads that were inherited by the park during the 1994 park expansion. Roads designated as open traverse open flat land, washes, and canyon bottoms. These roads would provide a unique four-wheel drive experience within the backcountry transition subzone. Impacts to resources, consisting of trampled vegetation and soil compaction, would be confined to the roadway. Motorists would be alerted to watch for wildlife, and maximum speeds would be 25 miles per hour. Closing the roads not designated as open and restoring them to a natural condition using native vegetation would further reduce impacts to vegetation, soils, and desert tortoise. Closing three roads in nonwilderness lands added to the park in 1994 would reduce impacts on cultural resources. Fewer areas accessible by vehicle would reduce access for illegal collecting.

A small area in the Little San Bernardino Mountains would be developed to create a parking area at the southern end of Berdoo/Thermal Canyon bicycle trial to provide for loading and off-loading of bicycles. The new proposed action would also provide for future studies for the development of a primitive automobile camp on new park lands within the Little San Bernardino Mountains. The studies would require additional environmental analysis and public review.

CLIMBING MANAGEMENT

This alternative would envision that the desired future condition of the climbing environment would be improved in those areas where resource impacts are significant. The management prescriptions for climbing would reduce impacts to microhabitats, vegetation, and soils along the access trails, at the base of climbs, on climbs, and in wilderness and non-wilderness areas. They would also prevent the degradation to scenic values due to chalk and fixed anchors. All non-designated trails would be reclaimed and signed as closed. Placement and replacement of fixed anchors would be done in a manner sensitive to resources and visitor wilderness experiences and to camouflage their appearance. If fixed anchors were removed, the subsequent hole would be filled with a mixture of natural granulated rock and bonding agent to prevent further damage to the rock.

Prohibiting climbing within 50 feet of rock art and other cultural sites would protect cultural resources. Closures of climbing routes could be implemented to prevent disturbance of sensitive species. Climbing exclosures could be created to provide a controlled area for the study of climbing impacts. The results of such studies would be used to enhance natural resources affected by climbing activities.

The creation of a Climbing Committee would provide users an avenue to present recommendations to the National Park Service about climbing management issues. Existing fixed anchors could be replaced for safety considerations throughout the park. Placement of new fixed anchors in non-wilderness areas would be permitted under a monitored process that would be established with input from the Climbing Committee. Some basic principles of the monitored process would include consideration of the impacts to the resource and visitor experience of the proposed new route, concern for the cumulative impacts from the placement of fixed anchors, and the new route cap.

New fixed anchors placement in wilderness would be authorized under permit. In addition to the principles listed above, approval of new routes should always reflect the commitment to keep the cumulative impacts of climbing in wilderness to levels at or below 1998 conditions. New routes would not exceed the annual cap limits. Anchor free zones would be designated throughout the park and managed to be free of any fixed anchors.

Alternative E prescribes that existing fixed anchors that cause social conflicts or intrude upon the wilderness experience would be camouflaged and/or eliminated. It also provides for the new or replacement fixed anchors to be camouflaged to decrease the visual impacts. Management prescriptions would also be developed for the use of chalk to eliminate visual impacts. Some unappealing routes would be eliminated and replaced by others of a higher quality to enhance the visitors' experience.

Fixed anchor free zones would preserve some areas of the park as completely unaffected by the presence of fixed anchors. This would eliminate climbing opportunities that rely upon fixed anchors from a portion of the park. This could detract from some climbers' experience, but would enhance the experience of those seeking solitude.

AUTOMOBILE CAMPING

The term automobile camping in this section refers to the practice of camping near your vehicle by pulling a short distance off the road or parking along the road to camp overnight. Alternative E would restrict auto camping to designated campgrounds and prohibit camping along roads. Impacts associated with camping, such as vegetation disturbance, soil compaction, and park maintenance of campgrounds, would be confined to existing frontcountry designated campgrounds in the developed zone. Use of frontcountry designated campgrounds would prevent disturbances to species of concern.

OVERNIGHT GROUP SIZE LIMITS

The new proposed action would continue to support dispersed camping in the backcountry transition and wilderness subzones of the park. The establishment of group size limits for the backcountry transition and wilderness subzones would protect resources and visitor wilderness experience by limiting the size of groups. The group size in the backcountry transition subzone would be 25; in wilderness, it would be 12. Leave no trace ethics would be promoted. Overnight group size limits in the backcountry could negatively impact large groups, but would enhance the experience of those seeking solitude and a wilderness experience.

AREA CLOSURES

The closure of Keys Ranch, unless accompanied by National Park Service personnel, would protect the cultural resources at the site. The closure of additional specific areas would protect sensitive wildlife nesting, lambing, and watering areas. Area closures for overnight camping would decrease the area where visitors would be allowed to camp in the backcountry by only seven percent.

ARTIFICIAL WATER SOURCES

The new proposed action would provide an in-depth analysis of four artificial water sources to determine if the sources should be maintained or removed. National Park Service biologists, in consultation with other Federal and state agencies, would determine the period of study and analysis. Any decision about artificial water sources would be based upon science. The study would determine if the sources sustain wildlife, meet the standards of the Wilderness Act, and comply with *NPS Management Policies*. Removal of artificial water sources could reduce the carrying capacity for bighorn sheep, but impacts would be thoroughly reviewed by an in-depth study.

Removal of all artificial water sources would enhance the wilderness experience of those expecting to see no permanent installations in wilderness. If, however, the removal of such artificial water sources had a negative impact on bighorn sheep and other wildlife species, visitors who delight in viewing wildlife would have a diminished experience.

DESERT TORTOISE RECOVERY

Alternative E would implement the approved *Desert Tortoise Recovery Plan* by designating the natural zone of the park as a Desert Wildlife Management Area and by adopting plan management prescriptions identified for the protection of the desert tortoise, except for fencing.

The desert tortoise is listed as a threatened and endangered species. The greatest potential for visitor-induced impacts to the tortoise would be from motorized, mechanized, and equestrian activities. Vehicles would be restricted to designated roads and parking areas. The maximum speed limit of 45 miles per hour on paved roads and 25 miles per hour on unpaved roads would, by design, keep speeds low. Low speeds allow visitors to be more aware of their surroundings and the presence of desert tortoise on the roads.

Bicycles would be permitted on roads open to vehicle use and designated trails. A public awareness initiative using print media, trail signs, and volunteers would be implemented to increase awareness about the desert tortoise. Horse and mules would be permitted on road shoulders and designated trails and corridors. Restricting travel to designated trails and corridors, coupled with signing and a strong volunteer corps, would provide an increased measure of tortoise awareness and protection.

The park would continue to survey and monitor for the desert tortoise. Information gathering would continue in accordance with directions provided by park resource staff and the Desert Tortoise Management Oversight Group. New information and data would be evaluated to ensure management actions are consistent with the recovery of the desert tortoise.

OLD PROPOSED ACTION (ALTERNATIVE A)

DESIGNATED TRAIL SYSTEM

This alternative would reduce impacts to soils and vegetation by designating a system of trails that would provide recreational opportunities for hikers, mountain bicyclists, and equestrians. Impacts would be concentrated upon a hardened or defined trail tread. While hikers could also hike cross country, many would probably use the designated and marked trails and would reduce the proliferation of redundant trails. Discouraging the proliferation of social trails would enhance wilderness experience.

A "corridor" concept would be introduced as a trail designation. The corridors would use minimum impact strategies and would not require development of trail tread. Trail corridors would be specifically defined routes of travel that would follow natural terrain, such as canyons, washes, and natural passes. Trail corridors would reduce impacts to soils and not require trail maintenance.

Obtaining a backcountry permit would be made easier by adding another backcountry self-registration board and by providing for phone-in permits. Access to remote areas of the park from outside the park boundary would be made easier by eliminating the requirement to park at a backcountry self-registration board.

Equestrian

Confining horses and mules to designated trails and corridors would limit the areas where horses would travel and reduce the proliferation of redundant trails that compact soil and damage vegetation. It would also reduce the areas where stock would trample desert tortoises. Confining stock to specified trails and corridors could negatively affect the equestrian experience, but the provision of a better protected and less impacted resource would enhance the stock users' park experience. This alternative presumes that the equestrian is interested in preserving the quality of the park so that it remains a beautiful place to enjoy horseback riding.

Bicycles

There would be new opportunities for mountain bicycle use on designated trails in nonwilderness.

DESIGNATION OF OPEN ROADS

This alternative would establish 36.9 miles of road corridor as part of the developed zone and provide for operating motor vehicles on rough dirt roads in rugged canyons. This alternative would reduce impacts associated with illegal off-road vehicles by limiting the number of roads that remain open. All of the closed roads, as well as the eight allowed to remain open, are located in habitat designated as critical to the desert tortoise. Fewer roads would result in less traffic and fewer areas where tortoises could be run over or collected.

This alternative would reduce impacts on cultural resources by closing three roads in the nonwilderness land added to the park in 1994. Fewer roads would result in less traffic and fewer areas that are accessible by vehicle where cultural resources could be illegally collected.

CLIMBING MANAGEMENT

Rock climbing would continue throughout the park. The climbing experience in wilderness areas would differ from climbing in the non-wilderness portions of the park. Impacts to resources in the developed zone and backcountry transition subzone by activities associated with climbing could increase, but impacts would not increase above 1998 levels in wilderness. In non-wilderness areas, climbers could continue to install new bolted routes under permit. Alternative A acknowledges that some routes in wilderness cannot be climbed without the installation of bolts. Wilderness experience would be enhanced by preventing the proliferation of new bolts in rock faces and by reducing access in some places.

AUTOMOBILE CAMPING

The term automobile camping in this section refers to the practice of camping near your vehicle by pulling a short distance off the road or parking along the road to camp overnight. Alternative E would restrict auto camping to designated campgrounds and prohibit camping along roads. Impacts associated with camping, such as vegetation disturbance, soil compaction, and park maintenance of campgrounds, would be confined to existing frontcountry designated campgrounds in the developed zone. Use of frontcountry designated campgrounds would prevent disturbances to species of concern.

OVERNIGHT GROUP SIZE LIMITS

This alternative continues to support dispersed camping in the backcountry transition and wilderness subzones of the park. Limits would be imposed on the size of groups that enter the natural zone to camp overnight. The group size in the backcountry transition subzone would be 25. In experience class A wilderness, overnight group size would be 12; the experience class B wilderness overnight groups size would be 8. Establishment of group size limits would protect resources and visitor wilderness experience by limiting the size of groups. Overnight group size limits in the backcountry could negatively impact large groups, but would enhance the experience of those seeking solitude and a wilderness experience.

AREA CLOSURES

The closure of Keys Ranch, except by guided tour, would provide protection to cultural resources at the ranch. The closure of additional specific areas would protect sensitive wildlife nesting, lambing, and watering areas. Area closures for overnight camping would only decrease the area where visitors would be allowed to camp in the backcountry by seven percent.

ARTIFICIAL WATER SOURCES

Alternative A would provide for an in-depth analysis of three artificial water sources to determine if the sources should be maintained or removed. The Pine City guzzler would not be evaluated. The study would determine if the sources sustain wildlife, meet the standards of the Wilderness Act, and comply with *NPS Management Policies*. Removing artificial big game guzzlers for bighorn sheep could reduce the carrying capacity for bighorn sheep near the water source if the guzzler actually supports a bighorn sheep population. Removal of all artificial water sources would enhance the wilderness purist's experience by not encountering a permanent installation in wilderness. If, however, the removal of such water source had a negative impact on bighorn sheep and other wildlife species, visitors who delight in seeing wildlife would have a diminished experience.

DESERT TORTOISE RECOVERY – Alternative A would implement the approve *Desert Tortoise Recovery Plan* by designating the natural zone of the park as a Desert Wildlife Management Area and by adopting plan management prescriptions identified for the protection of the desert tortoise, except for fencing.

The desert tortoise is listed as a threatened and endangered species. The greatest potential visitor-induced impacts to the tortoise would be from motorized, mechanized, and equestrian activities. Vehicles would be restricted to designated roads and parking areas. The maximum speed limit of 45 miles per hour on paved roads and 25 miles per hour on unpaved roads would, by design, keep speeds low. Low speeds allow visitors to be more aware of their surroundings and the presence of desert tortoise on the roads.

Bicycles would be permitted on roads open to vehicle use and designated trails. A public awareness initiative using print media, trail signs, and volunteers would be implemented to increase awareness about the desert tortoise. Horse and mules would be permitted on road shoulders and designated trails and corridors. Restricting travel to designated trails and corridors, coupled with signing and a strong volunteer corps, would provide an increased measure of tortoise awareness and protection.

The park would continue to survey and monitor for the desert tortoise. Information gathering would continue in accordance with directions provided by park resource staff and the Desert Tortoise Management Oversight Group. New information and data would be evaluated to ensure management actions are consistent with the recovery of the desert tortoise.

NO ACTION (ALTERNATIVE B)

DESIGNATED TRAIL SYSTEM

This alternative would result in increasing compaction of soil and denudation of vegetated areas by allowing multiple unplanned trails created by the repeated passage of foot or equestrian traffic. No action would be taken to evaluate the impacts that existing trails and social trails have on the park's natural and cultural resources. The visual scars left on the landscape from erosion and the "spaghetti" network of trails would eventually degrade the visitor experience.

DESIGNATION OF OPEN ROADS

No clear delineation of "open" or "closed" would be made for roads in the newly acquired lands. Any driveable road in nonwilderness would be allowed to remain open, thus continuing the denuded condition of such roads and affording access to many more locations where illegal off-road operations could impact vegetation and soils. The denuded condition of such roads and access to many more areas would increase the area where collecting or roadkill of desert tortoise could occur. This alternative would not have a negative or positive effect on bighorn sheep. This alternative would afford access to many more locations where illegal collecting of cultural resources could occur.

CLIMBING MANAGEMENT

The interim climbing management plan would remain in place. New bolts would be installed for rock climbing anywhere in nonwilderness without National Park Service management. Impacts to rocks in the developed zone and backcountry transition subzone by placement of new fixed anchors would occur; impacts to rocks would not increase in wilderness. No effort would be made to address other climbing impacts, such as social and access trails, compaction of soils and denuded vegetation at the base of climbs, use of chalks, cleaning cracks, etc.

AUTOMOBILE CAMPING

There would be no major changes under the no-action alternative. No clear direction would be provided to the public about automobile camping on the land added to the park in 1994, resulting in illegal out-of-bounds camping violations. Public use of the natural zone would be unchanged on the former monument land.

OVERNIGHT GROUP SIZE LIMITS

Group sizes for overnight stays in the wilderness or backcountry transition zone would not be imposed. The absence of group size limits for overnight camping in the backcountry would not impact large groups, but could disturb visitors who are seeking solitude and a wilderness experience.

AREA CLOSURES

Closures now in effect would remain in place to continue protection of cultural resources at Keys Ranch. No areas, other than Keys Ranch and those now closed to overnight stays, would be closed to public. Area closures for overnight camping would only decrease the area where visitors could camp by seven percent.

ARTIFICIAL WATER SOURCES

The three major artificial water sources in the park would remain, but would not be studied. They would not be maintained or repaired but would be removed if they began to pose a hazard to wildlife. Over time, they would deteriorate and fail. This action, which is not based upon science or evaluation of policy, could reduce the carrying capacity for bighorn sheep near artificial water sources

DESERT TORTOISE RECOVERY

No formal action to implement the *Desert Tortoise Recovery Plan* would be made. This alternative would result in increased stress to desert tortoise because compaction of soil and denudation of vegetated areas caused by social trails would continue. Attempts to mitigate impacts to the tortoise and tortoise habitat would continue as isolated efforts rather than a consolidated plan.

MAXIMUM PROTECTION (ALTERNATIVE C)

DESIGNATED TRAIL SYSTEM

Maximum protection would be afforded to soils and vegetation by confining all hiking and equestrian use to only the six designated trails. Maximum protection would be afforded to cultural resources by confining all hikers and equestrian use to designated trails. No bicycle trails would be implemented. The vast majority of the park would be inaccessible to park visitors. Visitor experience would be greatly reduced and support for the park would deteriorate.

DESIGNATION OF OPEN ROADS

No driveable roads on the nonwilderness lands added to the park would be open. Berdoo Canyon Road from the Geology Tour Road to the park boundary would be closed. Pinkham Canyon Road would be closed from Cottonwood well to the park boundary. The Black Eagle Mine Road would be closed. Such roads would be reclaimed and revegetated, reducing the opportunity for illegal collecting of cultural resources and desert tortoises. Visitors would have severely limited access to many sections of the park, especially the remote Cottonwood and Little San Bernardino Mountains. Visitor experience would be greatly reduced and support for the park would deteriorate.

CLIMBING MANAGEMENT

Climbers would be limited to clean climbing everywhere in the park, except the developed zone. No new bolting or replacement bolting would be permitted anywhere but the developed zone. All bolts would be removed from the natural zone. The holes left by the removal of fixed anchors would be filled and camouflaged. Climbing in wilderness would be allowed only through a limited number of permits. This alternative would reduce crowding in the wilderness subzone. The number of climbers in the developed zone and backcountry transition subzone would probably greatly increase by climbers displaced from wilderness. This alternative could improve the quality of those climbers with permits in the wilderness subzone. The experience of climbers and other park visitors in the developed zone and backcountry transition subzone would probably decrease.

AUTOMOBILE CAMPING

Camping would be confined to campgrounds. There would be no change from the present.

OVERNIGHT GROUP SIZE LIMITS

Limits would be imposed on the size of groups that enter the backcountry and wilderness. Backcountry camping by overnight groups would be permitted only in specifically designated and hardened sites; limits would be imposed on the number of parties permitted in each subdivision at any one time to minimize contacts between groups. Day users would be subject to the same group size limits as overnight users. This alternative would improve the quality of those visitors seeking a wilderness experience of solitude. Restricting camping to designated,

hardened sites would eliminate visitors' ability to plan a unique wilderness experience free from bureaucratic constraints.

AREA CLOSURES

In addition to the existing restrictions, extensive areas would be closed for resource protection during the summer. The closures would protect water sources for bighorn sheep and other wildlife during the critical drought months. The closures would have a negative effect upon visitors wishing to enter those areas during this time.

ARTIFICIAL WATER SOURCES

All artificial water sources would be removed immediately, and new sources would not be installed. While affording maximum protection to wilderness values, this alternative could impact the bighorn sheep that depend on an artificial water source. Even guzzlers that replace a depleted natural water source would be removed. This alternative would give maximum protection to backcountry and wilderness values, but not maximum care to a particular species, such as bighorn sheep. This alternative would remove human intrusions from the natural zone rather than manipulate the environment.

Removal of all artificial water sources would enhance the wilderness purist's experience by removing permanent installations in wilderness. If, however, the removal of such water sources had a negative impact on the bighorn sheep and other wildlife species, visitors who delight in seeing wildlife would have a diminished experience.

DESERT TORTOISE RECOVERY

Maximum protection would be provided to the tortoise by confining all hiking and equestrian use to designated trails and by closing 36.9 miles of backcountry roads through critical desert tortoise habitat.

MINIMUM PROTECTION (ALTERNATIVE D)

Existing impacts would continue and over time would seriously degrade park resources. Because visitor enjoyment of the park is dependent upon the preservation of park resources, degraded resources would severely diminish visitor enjoyment of and support for the park.

DESIGNATED TRAILS

All existing trails and routes of trail would be adopted as official trails. No effort would be made to restore vegetation or prevent new impacts caused by hikers or equestrians. Existing impacts would continue and over time seriously degrade park resources.

DESIGNATION OF OPEN ROADS

All unpaved roads and tracks would be designated as open to vehicle use. No effort would be made to restore vegetation or prevent new impacts caused by vehicles on nonwilderness roads. Existing impacts would continue; access to cultural resources where illegal collection could occur would continue.

CLIMBING MANAGEMENT

Climbers could install bolts anywhere without National Park Service oversight or management intervention. Additional impacts would occur to rocks as placement of new fixed anchors would not be limited. Only the use of power drills for bolt installation would be banned in wilderness. Creation of social trails and impacts to soils and vegetation at the base of climbs would continue.

AUTOMOBILE CAMPING

Automobile camping would be allowed to occur along any unpaved road in the park. No effort would be made to restore vegetation or prevent new impacts caused by roadside campers. Existing impacts would continue.

OVERNIGHT GROUP SIZE LIMITS

No limits on group sizes for overnight stays in the backcountry would be imposed.

AREA CLOSURES

No areas of the park, except Keys Ranch, would be closed or have access restricted to the public.

ARTIFICIAL WATER SOURCES

All artificial water sources would be maintained without analysis. More guzzlers could be installed to increase the number of bighorn sheep in the park.

DESERT TORTOISE RECOVERY

No action to implement the *Desert Tortoise Recovery Plan* would be made. No efforts would be made to manage public use in such a way as to reduce impacts on the desert tortoise. All existing networks of unpaved roads in critical habitat would remain open, affording more chances for accidental harm to tortoises and illegal taking.

Summary of Impacts

Alternative	*Natural Resources – Vegetation, Soils, and Rock*	*Natural Resources – Species of Special Concern*	*Cultural Resources*	*Visitor Enjoyment*
Alternative E: New Proposed Action	Designating a system of trails for hikers, bicyclists, and equestrians would reduce impacts. Impacts would be confined to a hardened or defined trail tread. Corridors would use minimum impact strategies for travel and would follow natural terrain. Closure and restoration of trails not in the designated system would reduce impacts. A short segment of the Berdoo/Thermal bicycle trail would be re-routed around wilderness on a path with the least impact on natural resources. An additional source of impacts may occur if the use of llamas is allowed as the result of a study. Limiting the number of roads that remain open would reduce impacts associated with illegal off-road vehicles. A small area in the Little San Bernardino Mountains to develop a primitive camp and at the southern end of Berdoo/ Thermal Canyon bicycle trail to develop a parking area may be impacted. Restoring closed roads to their natural condition would reduce impacts.	Confining horses to designated trails would enhance desert tortoise protection. Trails would be rerouted, temporarily closed, or signed if impacts to species of concern occurred. Closing several miles of three roads in nonwilderness land added to the park in 1994 would reduce impacts to desert tortoise. Fewer roads would result in less traffic and fewer areas where tortoise could be killed or collected. Closures of climbing routes could be implemented to prevent disturbance of sensitive species. Use of frontcountry designated campground would prevent disturbance to species of concern. The closure of specific backcountry areas would protect sensitive wildlife nesting, lambing and watering areas and would enhance conditions for wildlife. An in-depth analysis of the artificial water sources to determine if the sources sustain wildlife, meet the standards of the Wilderness Act, and meet *NPS Management Policies* would be	Closing three roads in nonwilderness land added to the park in 1994 would reduce impacts on cultural resources. Fewer areas that are accessible by vehicle would reduce access for illegal collecting. Prohibiting climbing within 50 feet of rock art and other cultural sites would protect cultural resources. Closing Keys Ranch to the public, unless accompanied by NPS personnel, would enhance cultural resource protection.	The new proposed action would provide a wide variety of visitor experiences in wilderness and nonwilderness areas of the natural zone. New opportunities for mountain bicycle use on designated trails in nonwilderness would occur. Confining horses to specified trails and corridors would limit where equestrians could travel, but less impacted resources would enhance the horse user's experience. Proliferation of social trails would not be allowed. Obtaining a backcountry permit would be easier by adding an additional backcountry self-registration board and providing for phone-in permits. Access to remote areas would be easier by eliminating the requirement to park at a backcountry self-registration board. The additional experience of using llamas may be provided depending upon a scientific study. If conflicts between user groups occurred, trails and corridors could be closed or trails could be rerouted. The 37.7 miles of roads designated as open would provide vehicle access to remote areas of the park and would enhance the visitor enjoyment of the Little San Bernardino and Cottonwood Mountains and the Pinto Basin. Visitor experience could be enhanced by the possible development of a primitive automobile camp in the Little San Bernardino Mountains and a parking area at the southern end of

Alternative	*Natural Resources – Vegetation, Soils, and Rock*	*Natural Resources – Species of Special Concern*	*Cultural Resources*	*Visitor Enjoyment*
	The desired future condition of a climbing management program would be improvement to the resources where impacts are significant. Management prescriptions would reduce climbing impacts to vegetation on access trails, the base of climbs, and microhabitats. Non-designated climbing social and access trails would be reclaimed and signed as closed. Damage to rocks from replacement of fixed anchors would be reduced. Although climbing impacts shall remain at 1998 levels, the number of holes drilled in rocks through the placement of new fixed anchors would increase. If fixed anchors were removed, the subsequent hole would be filled to prevent further damage to the rock. The impacts of fixed anchors in the fixed anchor-free zones would be eliminated or reduced. Climbing exclosures could be created to provide a controlled area for the study of climbing impacts. Impacts associated with camping, such as vegetation disturbance, soil compaction, and maintenance would be confined to existing frontcountry designated campgrounds in the developed zone.	based upon science. Removal of artificial water sources could reduce the carrying capacity for bighorn sheep, but impacts would be thoroughly reviewed during an in-depth analysis. Protection of the desert tortoise would be enhanced through the implementation of the *Desert Tortoise Recovery Plan.*		Berdoo/Thermal Canyon bicycle trail. The creation of a Climbing Committee would provide an avenue for users to present recommenda- tions to the NPS about climbing management. Allowing the replacement of existing fixed anchors would enhance visitor experience and safety. Existing fixed anchors that cause social conflicts or intrude on the wilderness experience would be eliminated. Visual impacts on rocks from the use of chalk would be reduced. New or replacement fixed anchors would be camouflaged to decrease the visual impact and enhance the backcountry and wilderness experience for visitors. Anchor free zones would eliminate climbing opportunities that rely upon fixed anchors from a portion of the park. This could detract from some climbers' experience, but would preserve some parts of the park as completely unaffected by the presence of fixed anchors. Limiting automobile camping to designated campground would prevent visitors from camping along the park roads. Overnight group size limits in the backcountry may negatively impact large groups, but would enhance the experience of those seeking solitude and a wilderness experience. Visitors would have the opportunity to use leave no trace ethics. Closures would decrease the area where visitors can camp in the backcountry by 7 percent of the park. Removal of all artificial water sources

Alternative	*Natural Resources – Vegetation, Soils, and Rock*	*Natural Resources – Species of Special Concern*	*Cultural Resources*	*Visitor Enjoyment*
	Group size limits would support dispersed camping in the backcountry and reduce impacts to soil and vegetation.			would enhance the wilderness purist's experience by the removing of permanent installations in wilderness. If, however, the removal of such water sources had a negative impact on the bighorn sheep and other wildlife species, visitors who delight in seeing wildlife would have a diminished experience.

Alternative	*Natural Resources – Vegetation, Soils, and Rock*	*Natural Resources – Species of Special Concern*	*Cultural Resources*	*Visitor Enjoyment*
Alternative A: Old Proposed Action	Designating a system of trails for hikers, bicyclists, and equestrians would reduce impacts to soils and vegetation. Impacts associated with illegal off-road vehicles by limiting the number of roads that remain open would be reduced. Confining auto camping to only established and designated campgrounds would limit impacts. Impacts to resources in the developed zone and backcountry transition subzone by activities associated with climbing could increase, but impacts would not increase above 1998 levels in wilderness. Limiting automobile camping to campgrounds would prevent denudation and soil compaction along roads. Impacts, such as soil compaction and denuded vegetation, from large groups overnight camping in backcountry would be limited.	Closing several miles of roads in nonwilderness land added to the park in 1994 would reduce impacts to desert tortoise. Confining stock to designated trails would have similar effects. Area closures for overnight use at sensitive water sources and other areas of the backcountry would enhance bighorn sheep and other wildlife protection. Removal of artificial water sources could reduce the carrying capacity for bighorn sheep, but impacts would be thoroughly reviewed during an in-depth analysis. Desert tortoise protection would be enhanced through implementation of the *Desert Tortoise Recovery Plan*.	Closing three roads in nonwilderness land added to the park in 1994 would reduce impacts on cultural resources. Fewer areas that are accessible by vehicle would reduce access for illegal collecting. Closures of Keys Ranch unless accompanied by NPS personnel would protect cultural resources.	Alternative A would provide a wide variety of visitor experiences in wilderness and nonwilderness areas of the natural zone. A designated trail system would discourage the proliferation of social trails. New opportunities for mountain bicycle use on designated trails in nonwilderness would occur. Confining stock to specified trails and corridors would limit the equestrian experience, but provide for a better-protected and less impacted resource that would ultimately enhance the stock users' experience. Climbing in wilderness would differ from climbing in nonwilderness. Overnight groups size limits could negatively impact large groups, but would enhance the experience of those seeking solitude and a wilderness experience. Area closure for overnight camping would only decrease the area where visitors could camp by 7 percent.

Alternative	*Natural Resources – Vegetation, Soils, and Rock*	*Natural Resources – Species of Special Concern*	*Cultural Resources*	*Visitor Enjoyment*
Alternative B: No Action	Increased compaction of soil and denudation of vegetation would occur from multiple social trails. Allowing any driveable roads in nonwilderness to remain open would continue denudation of such roads and promote access to more locations where illegal off-road use could impact vegetation and soils. Impacts to rocks in the developed zone and backcountry transition subzone by placement of new fixed anchors would occur; impacts would not increase in wilderness. No effort would be made to address other climbing impacts, such as social and access trails, compaction of soils, and denuded vegetation.	Increased stress on desert tortoise would result from soil compaction and denudation of vegetated areas caused by social trails and vehicle traffic. More areas of the park which would be accessible could contribute to collecting and increased mortality of tortoises from vehicles. Guzzlers would not be maintained or repaired. Over time they would deteriorate and fail. This action, not based on science or policy, could reduce the carrying capacity for bighorn sheep. This alternative would result in increased stress to desert tortoise. Attempts to mitigate impacts to tortoise and its habitat would be isolated efforts rather than a consolidated plan.	Vehicle access would continue to areas where illegal collecting could occur.	Visual scars left on the landscape from erosion and the "spaghetti" network of trails would eventually degrade the visitor experience. Additional climbing route development would continue in nonwilderness areas without management oversight or consideration of potential conflicts with other user groups. Unclear direction about automobile camping in the lands added to the park in 1994 would contribute to camping out-of-bounds citations. The absence of group size limitations for overnight camping in the backcountry would not impact large groups, but could disturb visitors seeking solitude and a wilderness experience. Area closure for overnight camping would only decrease the area where visitors could camp by 7 percent.

Alternative	*Natural Resources – Vegetation, Soils, and Rock*	*Natural Resources – Species of Special Concern*	*Cultural Resources*	*Visitor Enjoyment*
Alternative C: Maximum Protection	Confining all hiking and equestrian use to only a few designated trails would protect vegetation and soils. Closed existing trails and routes of travel would be restored to a natural condition. All roads in the wilderness and nonwilderness additions would be closed. Off-road vehicle use and resulting soil compaction and impacts to vegetation would be eliminated. No new bolting or replacement bolting would be permitted anywhere but the developed zone. The holes left by the removal of fixed anchors would be filled and camouflaged. Other impacts of climbing (social trails, access trails, impacts at the base of climbs, etc.) would probably decrease in wilderness because of limited numbers of climbers through permits, but would probably increase in the remainder of the park as climbers displaced from park wilderness would seek alternative climbing opportunities. Confining camping to designated and hardened sites would reduce impacts to soils and vegetation.	There would be no impacts to species of concern from human influences throughout most of the park. Closure of roads in the lands added to the park in 1994 would eliminate the possibility of road mortality of desert tortoise and other wildlife. Roads would be reclaimed and revegetated, providing maximum protection of desert tortoise. Area closures during the summer could enhance conditions for bighorn sheep and other wildlife by eliminating stress caused by human intrusions on sensitive habitat. Bighorn sheep that depend upon an artificial water source could be impacted. Maximum protection would be provided to the tortoise through implementation of the *Desert Tortoise Recovery Plan*.	Access would be confined to designated trails and no driveable roads would be open. Cultural sites would not be accessible to the public and would receive enhanced protection. Road closures to vehicles would reduce the opportunity for illegal collecting.	Hikers would be confined to trails. No trails would be designated for bicycles. Park visitors would not be allowed to access the vast majority of the park. Visitor experience would be greatly reduced. Support for the park would deteriorate. Motor vehicles would be limited to those roads designated as part of the developed zone in the former monument. Vehicle access through the park's backcountry would be severly limited and decrease visitor's opportunities to access remote areas of the park. Climbing in wilderness would be allowed only through a limited number of permits. This alternative could improve the quality of those climbers with permits in the wilderness subzone. The number of climbers in the backcountry transition subzone and developed zone would probably increase from displaced climbers from the wilderness subzone. The experience of other climbers and other park visitors in the developed zone and backcountry transition subzone would probably decrease as the number of climbers in these areas increased. Limiting camping opportunities to designated and hardened sites in the backcountry would eliminate visitors' ability to plan a unique wilderness experience.

Alternative	*Natural Resources – Vegetation, Soils, and Rock*	*Natural Resources – Species of Special Concern*	*Cultural Resources*	*Visitor Enjoyment*
				Area closure would eliminate approximately 7 percent of the park to both day and overnight use during the summer drought months and to overnight use the remainder of the year. Removal of all artificial water sources would enhance the wilderness purist's experience by the removing of permanent installations in wilderness. If, however, the removal of such water sources had a negative impact on the bighorn sheep and other wildlife species, visitors who delight in seeing wildlife would have a diminished experience.

Alternative	*Natural Resources – Vegetation, Soils, and Rock*	*Natural Resources – Species of Special Concern*	*Cultural Resources*	*Visitor Enjoyment*
Alternative D: Minimize Requirements	No effort would be made to restore vegetation or prevent new impacts caused by hikers, equestrians, or vehicles on nonwilderness roads. Existing impacts would continue and over time seriously degrade park resources. Additional impacts would occur to rocks as placement of new fixed anchors would not be limited or managed.	No effort would be made to manage public use to reduce impacts on the desert tortoise. More guzzlers could be installed to increase the numbers of bighorn sheep in the park. No effort would be made to implement the *Desert Tortoise Recovery Plan*.	No effort would be made to manage public use to reduce impacts on cultural resources. Accidental harm and illegal collecting of desert tortoise would occur.	Foot traffic would occur anywhere, and no trails would be designated. Equestrian traffic would be permitted anywhere. All driveable roads would remain open. Bolting would be permitted anywhere in the park with no NPS oversight. Automobile camping would be allowed to occur along any unpaved road in the park. No group size limits would be placed on overnight use. Existing impacts would continue and over time would seriously degrade park resources. Because visitor enjoyment of the park is dependent upon the preservation of park resources, degraded resources would severely diminish visitor enjoyment of and support for the park.

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Holly Van Houten, Recreation and Trails Planner, Pacific West Regional Office
Developed material for regional trail network

CONSULTATION, COORDINATION, AND PUBLIC COMMENT

Scoping Process and Issues and Alternatives Raised

Meetings and workshops comprised an integral part of the scoping process. They identified issues, alternatives, and impact topics to be considered in planning and kept the public informed throughout plan formulation. A notice of intent to prepare an environmental impact statement for the amendment to the *General Management Plan* for Joshua Tree National Park and to begin the scoping process was issued in the *Federal Register* on January 30, 1995.

The first formal public meetings were conducted in November 1995 with scoping meetings near Twentynine Palms and Joshua Tree and in Palm Springs, California to seek input on planning issues from the public. The most commonly issues raised were:

- equestrian use
- off-road vehicle use
- designation of trails systems
- group sizes
- bicycle use
- dispersed camping along roadside
- rock climbing and bolting installation

On February 13, 1996, the National Park Service mailed a synopsis of the issues raised during the meetings to all participants in the public scoping meetings. In addition, a group of 19 private citizens known as the conservation of resources task group (CORE) was assembled to provide information on the related planning issues.

During 1996, National Park Service personnel from the Recreation and Trails Office in the Planning and Partnerships Division of the Pacific West Regional Office held a series of meetings with local officials and users to discuss trail links from external areas to park portals. That information gathering was part of the scoping process.

Consultation

The National Park Service conducted an in-house review of the draft plan from March 18 to May 17, 1997. The in-house review included the regional and Washington offices of the National Park Service, Death Valley National Park, Mojave National Preserve, the Desert District Office of the Bureau of Land Management, and the three coordinated management planning teams in the California Desert (west Mojave, northern and eastern Colorado desert, and northern and eastern Mojave Desert).

Prior to release of this amendment, the National Park Service requested the review and suggestions of the Joshua Tree National Park Advisory Commission.

Congress established the Joshua Tree National Park Advisory Commission in the California Desert Protection Act to advise the National Park Service on the "...development and

implementation of a new or revised comprehensive management plan for Joshua Tree National Park." This amendment constitutes that plan. The draft plan was sent to each member of the advisory commission in September 1997. The first meeting of the advisory commission was held on September 27, 1997. This amendment was the major agenda item of that meeting.

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. Section 7 also requires that Federal agencies consult with the FWS to ensure that any action authorized, funded, or carried out by the agency does not jeopardize the continued existence of the species or of habitat that is designated as critical for that species. Informal consultation with the FWS in Carlsbad, California was initiated on October 2, 1996, with a request for a list of species that may be present in the area affected by the project. A copy of their comment is included in appendix D.

During public review of this draft, the National Park Service provided the draft to the California State Historic Preservation Officer, the California State Clearinghouse, San Bernardino and Riverside Counties, the Coachella Valley area governments, and the towns of Yucca Valley, Twentynine Palms, and Joshua Tree. The draft was also sent to the Agua Caliente Tribal Council, the Augustine Band of Mission Indians, the Cabazon Band of Mission Indians, the Chemehuevi Tribe, the Ft. Mojave Tribe, the Morongo Band, the Santa Rosa Reservation, the Torres-Martinez Desert Cahuilla Indians, and the Twentynine Palms Bank of Mission Indians.

Secretarial Order No. 3173, dated November 8, 1993, regarding Indian Trust Responsibilities, requires that any anticipated impacts to Indian trust resources from a proposed Federal action be explicitly addressed in environmental documents. The Department of Justice states that specific provisions of treaties, statutes, or executive orders determine the extent of the Federal trust responsibility for Indians. "Moreover, by definition, only real or personal property . . . can be held in trust" for Indian tribes (memorandum to Office of Management and Budget of May 21, 1993 from Assistant Attorney General of the United States). Trust resources include Indian trust lands, either tribally or individually held, water reserved for Indian reservations, or statutory or treaty-granted hunting or fishing rights. During the planning process, the National Park Service determined that there are no Indian trust lands, water rights, or hunting or fishing rights inside the boundaries of Joshua Tree National Park. No decisions made through this plan would affect any Indian trust resources that are on or near the border of the park.

Initial Public Review and Comment

On November 3, 1997, the National Park Service issued a regional and local press release that announced that the public comment period for the *Draft GMPA/EIS* began and would extend through January 31, 1998. A notice of availability was published in the *Federal Register* on November 21, 1997. In addition to the press releases that were sent to the media, the National Park Service mailed more than 260 press releases announcing the availability of the draft plan for public review and comment to agencies, organizations, and individuals. More than 370 copies of the draft plan and accompanying copies of the press release were mailed to interested parties. The draft plan was also posted on the Internet.

Three public workshops were conducted to provide park staff the opportunity to hear the concerns and suggestions of the public. The workshops were conducted in Beverly Hills on December 2, 1997, in Palm Desert on December 11, 1997, and in the village of Joshua Tree

on January 16, 1998. The park estimates that approximately 35 people attended the Beverly Hills workshop; 30 people attended the Palm Desert workshop; and 200 people attended the workshop in Joshua Tree. Regional and local press releases were issued prior to each workshop.

Because of the interest in the plan, the park extended the public review and comment period from January 31 through February 28, 1998. A notice of the extension of the public review and comment period was published in the *Federal Register* on January 26, 1998.

The NPS received 1,122 written comments about the draft plan. Just over 900 comments were primarily concerned with the climbing section of the plan; some also addressed other issues. More than 100 comments were directed toward the artificial water sources section of the plan and expressed concern for the bighorn sheep. Fifty-eight responses were related to equestrian issues; 10 were about llamas; and the remaining addressed a variety or combination of other issues or the entire plan. In addition to the public comments, the Joshua Tree National Park Advisory Commission met several times to discuss the *Draft General Management Plan Amendment and Supplemental Environmental Impact Statement.*

Development of a Supplement to the *Draft General Management Plan Amendment and Supplemental Environmental Impact Statement*

After the lengthy public review and comment process, thorough review of the comments and consideration of the Joshua Tree National Park Advisory Commission's input, the National Park Service determined that changes to the draft proposed action warranted issuing a supplement to the *Draft General Management Plan Amendment and Supplemental Environmental Impact Statement.* The *Supplement* presented Alternative E – the New Preferred Alternative to the public.

The *Supplement* (Alternative E) contained:

- an update on the planning process and public involvement including further description of some of the reasons for preparation of this *Supplement* and what steps to expect in the future
- a discussion of the new alternative, which constitutes the National Park Service's new proposed action
- a discussion of the environmental consequences of implementing the new alternative
- summary tables comparing the actions and consequences of the five alternatives

A synopsis of the changes that were incorporated in the *Supplement* (Alternative E) as the result of public comments and the input of the Advisory Commission follows.

- The *Supplement* (Alternative E) did not distinguish between wilderness experience classes A and B. Wilderness use and experience levels would be managed equally throughout the park.

- The equestrian trails would be increased by 3.15 miles from Alternative A and would be included in the designated trail system in the *Supplement* (Alternative E). Another 1.2 miles would be considered after resource and maintenance evaluations were completed. An option would exist, at the discretion of the Superintendent, to study the use of llamas in the park with the protection of resources and consistency with the National Park

Service mission being the priority. Remote areas, where parking at a backcountry self-registration board would not be required, would include Pinto Basin and the Coxcomb, Pinto, Eagle, Little San Bernardino, and Cottonwood mountains. No new trail requests would be considered until the designated trails were inventoried, developed, and monitored for several years. Trails not designated as part of the trail system would be restored to a natural condition. A reroute of .67 miles would move the .5-mile section of the Berdoo/Thermal Canyon bicycle trail that currently lies in wilderness to the backcountry transition subzone.

- An additional .8 miles (Snow Cloud Mine spur) of unpaved roads would be designated as part of the developed zone. All roads not designated as open would be closed to vehicle access and would be reclaimed as part of the natural zone. A parking area would be established at the southern base of Berdoo/Thermal Canyon bicycle trail to provide a staging point for loading/off-loading bicycles.

- The Climbing Committee would function as a subcommittee of the Joshua Tree National Park Advisory Commission and would be chaired by a commissioner and comprised of representatives of the climbing community, conservation organizations, and other individuals. Replacement of existing fixed anchors would be allowed throughout the park. Replacement and new fixed anchors should be with neutral or rock-colored hangers and chains. Replacement of existing fixed anchors should be accomplished in a manner that removes the old fixed anchor with minimum damage to the rock resource. The *Supplement* (Alternative E) would allow for the use of power drills with a permit in the developed zone and backcountry transition subzone. Placement of fixed anchors in the developed zone and backcountry transition subzone would not require a permit, but a monitored process would be established to provide guidance and management oversight. The monitored process would be developed with the assistance of the Climbing Committee. The *Supplement* (Alternative E) would provide a cap on the number of new climbing routes with fixed anchors per year. A park-wide survey of existing routes with fixed anchors would assess impacts to resources and visitor experiences. Management prescriptions would consist of relocation of specific fixed anchors and approach and descent routes, and/or permanent or temporary closures. Fixed anchors in wilderness found to impact resources or visitor wilderness experience would be camouflaged or removed. Placement of any new fixed anchors in wilderness should require prior approval in the form of a permit by the Superintendent, and any climbing impacts in wilderness should not exceed 1998 levels. The *Supplement* (Alternative E) would establish fixed anchor free zones in the park.

- No automobile camping would be allowed on land added to the park in 1994, but the National Park Service would have the option to study placing a primitive camp in the backcountry transition subzone of the Little San Bernardino Mountains.

- The Pine City guzzler would be added to the list of artificial water sources to be studied. The *Supplement* (Alternative E) would leave the determination of the period of the study and implementation to National Park Service biologists in consultation with other federal and state agencies. Maintenance of the guzzlers could continue during the study period.

- The elimination of the wilderness experience classes would require a designation of a single group size limit for overnight use throughout the wilderness subzone. The overnight group size limit would be12 throughout wilderness subzone and 25 in the backcountry transition subzone.

- The *Supplement* would not change recommendations for Area Closures and the Desert Tortoise found in Alternative A, the Proposed Action, in the *Draft General Management Plan Amendment and Supplemental Environmental Impact Statement.*

Second Public Review and Comment Period

On November 2, 1998, the National Park Service issued a regional and local press release that announced that the public comment period for the *Supplement to the Draft General Management Plan Amendment and Supplemental Environmental Impact Statement* began and would extend through December 31, 1998. A notice of availability was published in the *Federal Register* on November 3, 1998. Because of the busy holiday season and the interest expressed in the Supplement, the National Park Service extended the public comment period until January 20, 1999. A notice of the extension was also published in the *Federal Register.*

In addition to the press releases published by the media, the park mailed more than 280 copies of the press release announcing the availability of the draft plan for public review and comment to agencies, organizations, and individuals. Approximately 450 copies of the Supplement (Alternative E) and accompanying press releases were mailed to interested parties. The Supplement (Alternative E) was also posted on the Internet.

The National Park Service received 183 written comments that addressed the new proposed action. As with the *Draft General Management Plan Amendment and Supplemental Environmental Impact Statement*, the majority of the comments addressed climbing management and expressed support for the new alternative. Responses to comments are contained in appendix D.

LIST OF AGENCIES AND ORGANIZATIONS TO WHOM COPIES OF THE PRESS RELEASE AND/OR DRAFT DOCUMENT HAVE BEEN SENT

Joshua Tree National Park Advisory Commission
Mr. Chuck Bell
Ms. Cyndie Bransford
Mr. Richard Russell
Mr. Gary Daigneault
Mr. Brian Huse
Mr. Roger Melanson
Ms. Leslie Mouriquand
Mr. Gilbert Zimmerman
Mr. Julian McIntyre
Ms. Diane Benson
Mr. Michael McCormack
Dr. Byron Walls
Supervisor Roy Wilson
Supervisor Kathy Davis

Federal Agencies and Elected Officials
Senator Barbara Boxer
Representative Mary Bono
Representative Ken Calvert
Senator Dianne Fienstein
Representative Jerry Lewis
Department of Defense
    U.S. Marine Corps, Twentynine Palms (2 addresses)
Department of the Interior
    Bureau of Land Management
        California Desert District (3 addresses)
    Fish and Wildlife Service
    National Park Service
        Death Valley National Park
        Great Basin National Park
        Lake Mead National Recreation Area
        Mojave National Preserve
        Pacific West Region
        Washington Office
Department of Justice
    U.S. Attorney's Office
Environmental Protection Agency

State Agencies and Elected Officials
California Department of Fish and Game (3 different offices)
California Department of Forestry
California Department of Parks and Recreation

California Desert District
California Highway Patrol
California Historic Preservation Officer
California Native American Heritage Commission
California Office of the Governor
Mt. San Jacinto State Park
Representative Fred Aguiar
Senator Ruben Ayala
Representative Joe Baca
Representative Jim Battin
Representative Jim Brulte
Senator William Craven
Senator Ray Haynes
Representative Ted Weggeland
Salton Sea State Park

Local Agencies
Chiriaco Center
City of Cathedral City
City of Coachella
City of Desert Hot Springs
City of Indian Wells
City of Indio
City of La Quinta
City of Palm Desert
City of Palm Springs
City of Rancho Mirage
City of Salton Sea
City of Twentynine Palms
Inland Empire Economic Partnership
Riverside County
San Bernadino County
Town of Desert Center
Town of Yucca Valley
Lake Tamerisk

Native Amercian Consultation
Agua Caliente Tribal Council
Augustine Band of Mission Indians
Cabazon Band of Mission Indians
Chemehuevi Tribe
Ft. Mojave Tribe
Morongo Band
Santa Rosa Reservation
Torres-Martinez Desert Cahuilla Indians (2 addresses)
Twentynine Palms Band of Mission Indians

Organizations
Access Fund (3 addresses)
American Search and Rescue Institute
Audubon Society
Bighorn Sheep Society
California Desert Protection League
California Native Plant Society (2 addresses)
Climbing Magazine
Coachella Valley Mountain Conservancy
Chamber of Commerce of Coachella
Chamber of Commerce of Indio
Chamber of Commerce of Joshua Tree
Chamber of Commerce of Morongo Valley
Chamber of Commerce of Palm Desert
Chamber of Commerce of Palm Springs
Chamber of Commerce of Twentynine Palms
Chamber of Commerce of Yucca Valley
Desert Protective Council
Desert Tortoise Council
Friends of Joshua Tree
Hi Desert Museum
Institute for Policy Research
Living Desert Museum
Metropolitan Water District
Morongo Basin Conservation Association
Mountain Tools
National Parks and Conservation Association
Nature Conservancy (2 addresses)
Offroad Vehicle Association
Ojai and Ventura Voice
Pacific Crest Outward Bound School
Palm Springs Desert Museum
Rock and Ice
Sierra Club (8 addresses)
Sierra Institute
Society for the Conservation of Bighorn Sheep (3 addresses)
Southern Sierra Climbers' Association
The Wildlands Conservancy
Twentynine Palms Historical Society
Vertical Hold Sport Climbing Center
Wheelchair Activity Group
Wilderness Society

APPENDIX A: TRAIL SYSTEM

Mileage is for specific trails only, which often is measured from one trail intersection to another. Trails are listed as strenuous (S) moderately strenuous (MS), moderate (M), and easy (E).

NATURE TRAILS

High View — 1.3 mile loop (M)
Starting point — Black Rock Canyon Campground. This is a well maintained, moderately steep trail leading to a good viewpoint of Yucca Valley and Mt. San Gorgonio. A handout may be available at the Black Rock Nature Center that provides information on the high desert environment.

Hidden Valley — 1 mile loop (E)
Starting point — Hidden Valley picnic area. This well maintained easy trail takes hikers into a rock-enclosed valley rumored to have been used by cattle rustlers in the late 1800's.

Barker Dam — 1.1 mile loop (E)
Starting point — Barker Dam parking area. This is a well maintained easy trail to a dam and tank built by early cattle ranchers. The trail leads past Native American petroglyphs.

Cap Rock — 0.4 mile loop (E)
Starting point — Cap Rock parking area. This is an easy, paved, wheelchair accessible trail that circles through boulder formations showing the geology and plants of the Mojave Desert. The area is named for the large rock perched like a cap on the largest rock formation.

Keys View Loop — 0.25 mile loop (E)
Starting point — Keys View road. This short paved trail ascends to a viewpoint of the Coachella Valley, Mt. San Jacinto, Mt. San Gorgonio, and the Salton Sea.

Skull Rock — 1.7 mile loop (E)
Starting point — Jumbo Rocks Campground near loop E. Interpretive signs guide visitors through boulder piles, desert washes, and a rock alleyway to the rock formation known as Skull Rock.

Indian Cove — 0.6 mile loop (E)
Starting point — west end of Indian Cove Campground. The trail skirts the edge of the boulders at the northern edge of the Wonderland of Rocks. Signs along the way interpret the plants and animals of the Mojave Desert and early human life in the area.

Oasis of Mara — 0.5 mile loop (E)
Starting point — Oasis Visitor Center. Once a popular gathering place for Native Americans, this paved, wheelchair accessible trail provides a good introduction to an oasis habitat.

Arch Rock — 0.3 mile loop (E)
Starting point — White Tank Campground, opposite site 9. Signs along this trail interpret the geology of the area and the formation of a natural arch.

Cholla Cactus Garden — 0.25 mile loop (E)
Starting point — Pinto Basin Road 20 miles north of Cottonwood. This trail meanders through a dense concentration of Bigelow Cholla in the lower edge of the transition zone between the Mojave and Colorado Deserts.

Cottonwood Spring — 1 mile loop (E)
Starting point — Cottonwood Spring parking area. Signs interpret the plants and animals of the Colorado Desert as it winds through rolling hills.

Botanical Walk — 0.2 mile loop (E)
Starting point — Cottonwood Visitor Center. This short trail loops through typical Colorado Desert vegetation, with signs identifying the plants.

Bajada Trail - .25 mile (E)
Starting point - South entrance to the park. This accessible mile loop has hardened trail tread and interprets the natural features.

HIKING AND EQUESTRIAN TRAILS AND CORRIDORS
California Riding and Hiking Trail (CRHT) — 37 miles one way (E-MS)
The trail passes through a wide range of park vegetation, including piñon/juniper forests, Joshua tree forests and creosote-dominated lowlands. Access can be gained in numerous locations including, Black Rock Campground, Covington Flats, Ryan Campground, Twin Tanks backcountry board, and near the north entrance. There is a spur of the trail at mile 28 leading to the Covington Flats parking area (2 miles) and another spur at mile 35.6 leads to Black Rock Camp (1.5 miles). The 7-mile section from north entrance to Pinto Basin Road is also designated as a bike trail.

Boy Scout Trail — 8 miles one-way (M)
Access can be gained at the Indian Cove backcountry board or the Keys West backcountry board. This trail provides a variety of terrain and views as it travels through picturesque washes along the edge of the Wonderland of Rocks. It is lined with juniper, piñon and oak trees then follows a rocky hillside and continues through steep mountains and narrow canyons. The east side of the trail and the open desert near Indian Cove is for day use only.

BLACK ROCK VICINITY
Long Canyon/Chuckawalla Bill Corridor — 8.5 miles one-way (MS)
Long Canyon runs from near the northwest boundary of the park due south to the park's south boundary near Desert Hot Springs, winding down through high mountains. About halfway along the main canyon, a side canyon leads to Chuckawalla Bill ruins.

Little Long Canyon Corridor — 1.2 miles one way (E)
This is a small wash west of Black Rock and east of the more extensive Long Canyon. The corridor ends at a knoll at 4,560 feet elevation that provides a limited view of Warren Peak and the surrounding hills. A more open view is available along the way and there is prolific vegetation. The corridor also includes a 0.2 mile spur that follows an old unused road that leads west to an overlook toward Morongo Valley.

West Side Loop Trail — 5.1 mile loop (MS)
This trail begins and ends at Black Rock Campground. It is interesting for its geology and vegetation and creates a feel for the wilderness area where it is located. It contains a pretty, narrow ravine.

Black Rock Canyon with Panorama Loop/Morongo View — 6.2/5.3 miles (MS/M)
This trail begins and ends at the Black Rock Campground. This is a pretty canyon with multiple viewpoints on top with outstanding panoramic views of Coachella Valley, including the Salton Sea and the Black Rock vicinity.

Short Loop Trail/via Fault — 4.9/4.3 mile loop (M)
This very popular trail through oaks, piñons, and junipers, is nice but short. It begins and ends at the Black Rock Campground. The Fault trail leads past a rupture from the 1992 Landers earthquake where crevices are still visible.

Burnt Hill Trail — 2.8 miles one way (E)
Starting at the Black Rock Canyon Trail 0.8 mile from Black Rock Campground, this trail ends at Eureka Canyon Trail. The hill in the middle of the valley burned sometime in the 1970's. A good wildflower display can sometimes be seen in the spring.

Canyon View Trail — 1.6 miles one way (MS)
This trail connects the Short Loop Trail with the Eureka Peak Trail, running parallel with the Eureka Peak Trail within about 0.25 mile to the west. It is a beautiful trail offering fine vegetation and good views of the local canyon system.

Cliff Trail — 1.7 miles one way (MS)
This trail connects the California Riding and Hiking Trail near mile 35 with the Eureka Peak Trail. It was named for its proximity to the abrupt top edge of Eureka Canyon near its deepest spot, at which point one can walk over and look down. The new proposed action adds .5 miles that take the rider out of the wash into the piñons, junipers, oaks, and nolina to offer view of the canyon system.

Eureka Peak Trail — 5.2 miles one way (S)
The trail begins at the California Riding and Hiking Trail mile 35.6. Excellent views are available from the 5,518-foot peak. The trail passes through a narrow canyon and pine forest. The view includes Mt. San Gorgonio, the Coachella Valley, and an incredible view of Mt. San Jacinto towering above the Coachella Valley. The trail continues beyond Eureka Peak and joins the California Riding and Hiking Trail at mile 32.2.

Boundary Trails E and W — 2.5 miles one way (E)
These trails follow the park's north boundary linking Black Rock with other trails. The west trail connects the West Side Loop Trail with Long Canyon Corridor. The east trail connects Black Rock Camp with the newly designated California Riding and Hiking Trail south of La Contenta Road.

Deerhorn Trail — 2.65 miles one way (M)
Accessible from mile 31.9 and 33.9 of the California Riding and Hiking Trail, this trail is one of the favorites of the local horse users. It provides sweeping views and a variety of vegetation, and deer are frequently sighted.

Covington Loop Trail — 3.95 miles (M)
This trail intersects at Deerhorn Trail in Upper Covington Flats and proceeds through Lower Covington. It passes through an area burned over during the lightening-caused Covington Fire of 1995.

Covington Crest Trail — 1.7 miles one way (E)
This trail begins at the California Riding and Hiking Trail mile 29.5 and heads south to an overlook of the Coachella Valley at 5,022 feet.

Bigfoot Trail — 12.7 miles one way (E-S)
This trail begins near Eureka Peak and heads east through Lower Covington and on toward west entrance and terminates at Samuelson Rock and the cabin site. Much of this trail is within the burn area of the 1995 Covington fire. It links the Black Rock vicinity trails with the west entrance vicinity trails. Difficulty depends on section and direction of travel.

Bigfoot Spur — 0.7 mile one way (M)
This spur trail connects the Eureka Canyon Trail with the Bigfoot Trail. It is popular for those wishing to head east to Lower Covington Flats and not proceed to Eureka Peak.

Nolina Cove Spur — 0.25 miles (E)
This spur leaves Bigfoot Trail to connect with roads in the Whispering Pines development.

WEST ENTRANCE VICINITY
West Access Trail - 1.7 miles (E)
Provides direct access to the Burro Loop on the north side of Park Boulevard as well as the connector to Bigfoot on the south side.

North Side Access - .7 miles one way (E)
Joins the west access trail with the North Side Trail somewhat parallel and north of park route 12 running east to west.

Cactus Cove View - .2 miles
Provides access from Joshua Highlands to the park and offers a 360 degree panorama view from the ridge at the park boundary.

Quail Springs Historic Trail and Wash — 7.8 miles one way (E)
The new proposed action includes a minor rerouting of the trail. This trail begins at Quail Springs Wash near the park's north boundary or at the Quail Springs Picnic area or Keys west backcountry board. This road/trail travels across an open valley dotted with Joshua trees and then joins and follows the wash to the north boundary.

Mary Trail — 1 mile one way (E)
A parallel alternative to the sandy Quail Wash, this trail leaves the wash near the park's boundary and is named for the survey monument located between the wash and trail.

Johnny Lang Canyon Corridor — 3.2 miles one way (E)
This trail begins at the Quail Springs historic route southeast of Samuelson rock and the cabin site, and the corridor ends at the end of the canyon where the Ryan Lang connector trail begins. The canyon provides quiet beauty and variety of terrain, vegetation, and views. Piñon pines grow in the rugged, rocky valley in the upper canyon.

Johnny Lang Connector Trail — 1.8 miles one way (M)
This trail connects Johnny Lang Canyon with the old Lost Horse Road just southwest of Quail Springs picnic area.

Samuelson West Trail — 1.8 miles one way (E)
This trail begins at Quail Wash about 1 mile south of north boundary and ends either at the Bigfoot trail 0.4 miles north of Samuelson Rock or 0.75 mile from Samuelson if taking the northern spur. A 0.3-mile spur in the middle of this trail leads to a large hunk of multicolored quartz.

Panorama Trail — 3.3 miles one way (MS)
The new proposed action includes a reroute of the bottom of the trail. This trail begins at Quail Wash near the north boundary and ends at the Bigfoot trail 0.9 mile south of the south side connector trail. The trail offers extensive panoramic views.

South Side Connector — 0.5 mile one way (E)
This trail connects the Window/Maze Loop Trail east of the borrow pit staging area to the Bigfoot Trail south of Route 12. The connection leads to all trails south of route 12 to the west and east.

North Side Trail — 1.8 miles one way (E)
Accessed via the borrow pit, this trail leads to the Burro Trail to the north.

North and South Side Connector — 1.1 mile one way (E)
This trail links the North Side Trail with the Bigfoot Trail near the west entrance, crossing over park Route 12.

Burro/Rocky View Loop Trail — 3.5/1.2 miles/.4 (M/MS)
The new proposed action includes one viewpoint spur on the Burro Loop (.1 miles). There are two access points for these trails. One is by way of North Side Trail from the borrow pit and the other via BLM land near Panorama Heights. Access through the BLM land adds 0.5 mile of trail inside the park. This area is rugged and beautiful; the trail follows routes through canyons and across ravines. Rocky View follows a rugged course with a wide variety of terrain and rock formations.

Maze/Window Loop Trails — 4.85/5.7 miles (MS)
This trail begins and ends at the borrow pit. The loops offer numerous rock formations, several vistas, and a sense of wilderness. The trail wanders through rock formations and around a hole on the top of a mountain that the trail circumnavigates. Bypassing the Window Loop shortens the trip by nearly a mile.

North View Trail — 3.25 miles one way (MS)
The new proposed action includes two viewpoints (.3 miles). This favorite trail of local equestrians begins at the borrow pit and ends on the Maze Loop. Many viewpoints are outstanding.

Big Pine Trail — 3 miles one way (E)
This trail starts from the North View Trail 0.25 mile north of the Maze Loop and travels east to the Boy Scout Trail with a 0.6-mile one way spur to the Big Pine.

RYAN/LOST HORSE/TO NORTH ENTRANCE
Lost Horse Loop — 8.4 miles from parking lot/12.6 from Ryan Campground (MS)
The new proposed action includes a spur to the Mine (.3 miles). This trip includes Lost Horse Mine and Lost Horse Mountain over a high ridge to a remote valley where Joshua trees and piñon pines are common. By not completing the loop and backtracking to the parking lot, the mine trip is a moderate 4 miles long. By not completing the loop and backtracking to Ryan Campground the mine trip is 9.9 easy miles.

Squaw Tank Trail — 4.2 miles one way (M)
This trail links the California Riding and Hiking Trail near mile 15.2 with the Geology Tour Road at Squaw Tank. The trail passes through some impressive geological formations, including Malapi Hill.

Ryan/Johnny Lang Connector Trail — 4.6 miles one way (MS)
This trail connects the Johnny Lang canyon corridor with the California Riding and Hiking Trail near mile 20.

Stubbe Springs Loop — 6.5 miles (M)
The new proposed action includes the Fan Canyon View spur (.4 miles). Beginning at the California Riding and Hiking Trail at mile 20, this trail initially follows about 1 mile of the old Juniper Flats Road then heads south and west to near Stubbe Springs. From the Stubbe Springs wash it travels north to cross over the old Juniper Flats Road and rejoin the California Riding and Hiking Trail at about mile 22.5.

Cap Rock Trail — 3 miles one way (E)
This trail begins at Ryan Campground and joins the California Riding and Hiking Trail near mile 19. It provides an easy loop from the campground with a variety of scenery.

Old Lost Horse Road Trail — 5 miles one way (E)
This trail begins at Ryan Campground and travels through Lost Horse Valley to the Quail Springs Historic Trail.

Old Queen Valley Historic Road Trail — 6 miles one way (E)
This trail connects the Pine City backcountry board with the Wall Street Mill area via an old road north of Negro Hill and continues on to Echo "T" intersection. A 1-mile section of this trail near Wall Street Mill is also part of the Ryan Mountain Loop Trail.

Ruins/Lost Horse Well Road/Trail — 1 mile loop (E)
This road/trail is adjacent to the Ryan Campground. The ruins can be seen easily from the campground, and the route follows old roads that are closed to vehicles.

Ryan Mountain Trail — 3 miles round trip (MS)
This route begins at Ryan Mountain parking area and provides outstanding 360º panoramic views from the 5,461-foot peak. No horses are permitted on this trail.

Ryan Mountain Loop Trail — 9.75 mile loop (M)
This trail begins at the Ryan Mountain Campground and completely encircles Ryan Mountain and joins the California Riding and Hiking Trail near mile 14.2. It provides a nice view of the Lost Horse Valley.
Lost Horse Valley Trail — 2.5 miles one way (E)
This trail begins at Ryan Campground and travels through Lost Horse Valley due north to the Echo "T" intersection.

Pine City Trail — 3 miles round trip (E)
This trail starts at the Pine City backcountry board. This island of desert greenery contains large pine trees among an isolated collection of rocky walls and boulder mounds. This is a good place for viewing bighorn sheep and birds.

Lucky Boy Vista/Queen Mine Loop Trail — 6.8 miles round trip (MS)
Visitors use the Pine City backcountry board location for overnight use or begin at the Lucky Boy Junction for day use. The trail goes to a high, level plateau that provides excellent views. Points of interest include Elton Mine, Desert Queen Mine, Eagle Cliff and the Lucky Boy Vista.

Contact Mine Trail — 3.4 miles round trip (MS)
The trail begins and ends at the north entrance exhibit. The mine produced gold and silver in the early 1900's. Building ruins, old machinery, tram tracks, a cable winch, and partially collapsed shafts are still visible.

North Entrance Access Tail — 0.5 mile one way (E)
This trail provides access from BLM section 14 in Gold to the California Riding and Hiking Trail mile 0.5 near the north entrance.

Wall Street Mill Trail — 1.5 miles round trip (E)
The new proposed action will include a hitch rail in the vicinity of the Wall Street Mill. This trail begins at Wonderland Ranch parking area. The mill was used by Bill Keys to process ore from the Desert Queen Mine and is in a pretty area on the southern edge of the Wonderland. There is a stone marker along the way that reads, "Here is Where Worth Bagly Bit the dust At the Hand of W.F. KEYS, May 11, 1943."

Face Rock Spur - .15 miles
Spur trail leads to an amazingly life-like Face Rock and nearby historic stock water trough.

WONDERLAND OF ROCKS (Pedestrian Trails Only)
Fortynine Palms Oasis Trail — 3 miles round trip (MS)
One of five palm oases in the park, Fortynine Palms holds over 50 native fan palms in this rocky canyon. There are pools of water and large polished boulders as well as evidence of past wildfires.

Willow Hole Trail — 7 miles round trip (E)
Starting at the Keys west backcountry board, the trail begins in open desert then follows a narrowing wash through tall boulder piles. Near Willow Hole big willow trees and rocky walls surround large pools of water. This trail is part of the Wonderland Connection Trail.

AREAS EAST AND COTTONWOOD VICINITY
Pushawalla Canyon Corridor — 12 miles one way (MS)
This corridor runs from the Pinyon Well parking area to the south boundary accessible from Dillon Road. The corridor includes a good variety of vegetation and scenic views and lies in an area that is seldom visited.

Fried Liver Wash Corridor — 14 miles one way (E)
Access is at either the Pleasant Valley backcountry board or Pinto Basin Road. This corridor follows a wide sandy wash that winds its way from the Mojave Desert through the transition zone and into the Colorado Desert. During good years for wildflowers, this wash provides a colorful spring display.

Hexahedron Mine Trail — 8 miles round trip (MS)
This trail begins at the Pleasant Valley backcountry board and follows the Fried Liver Wash corridor for the first 2.5 miles. It then turns north into the Hexie Mountains to the mine. The hike up the mountain provides a variety of panoramic views. While the mine itself is of little interest, a nearby roofless rock house is interesting.

Big Wash Corridor — 16 miles one way (E)
This corridor links the Black Eagle Mine Road in the Pinto Basin with the Eagle Mountain Road east of the Eagle Mountains. This old road/trail passes through the heart of the Eagle Mountains in the bottom of a large sandy wash.

Mastodon Peak Loop Trail — 3 miles (M)
This trail begins at the Cottonwood Springs Oasis. The peak provides excellent views of the Cottonwood area, Eagle Peak, Monument Mountain, Mt. San Jacinto, Shavers Valley, and the Salton Sea. The trail passes by the Mastodon mine and the Winona Mill where gold was mined between 1919 and 1932. The Winona Mill was an active homestead in the 1920s. No stock are permitted on this trail

Lost Palms Oasis Trail — 7.5 miles round trip (M)
This trail begins at the Cottonwood Springs Oasis. Lost Palms is one of the largest palm oases in the park and has over 100 palm trees. The trail to the oasis overlook meanders through sandy washes and rolling hills. The overlook is at the end of the moderate portion of trail. A strenuous trail leads down into the canyon and running water at the oasis. No stock is permitted on this trail.

BICYCLE TRAILS
The following trails are for use by bicyclists as well as hikers and equestrians as noted.

California Riding and Hiking Trail — 7-mile section between north entrance and Pinto Basin Road. (M)
This section of the California Riding and Hiking Trail travels through a sandy wash most of the way. Traveling from the Pinto Basin Road to the north entrance backcountry board provides a downhill trip and a somewhat easier hike through the sand.

Old Queen Valley Historic Road Trail — 4.75 miles one way (E)
This trail connects the Pine City backcountry board with the Wall Street Mill parking area via an old road north of Negro Hill.

Lost Horse Valley Trail — 2.5 miles one way (E)
This trail connects Ryan Campground with the Echo "T" intersection.

Old Lost Horse Road Trail — 5 miles one way (E)
This road/trail begins at Ryan Campground and travels through Lost Horse Valley to the Quail Springs Historic Trail. The *General Management Plan* proposed that this road be closed to vehicle traffic and revegetated. The road is closed to public motor vehicle use, but this plan would redesignated it as a bicycle trail, so it would only be partially revegetated.

Berdoo/Thermal Canyon Bike Trail — 10 miles one way (S)
The trail begins at the Berdoo Canyon 4-wheel drive road off of the Geology Tour Road. This rigorous trail follows an old closed road through a very scenic and rugged portion of the Cottonwood Mountains with some very nice overlooks. Overnight camping is available to visitors who register at the Pleasant Valley backcountry board. Riding from this backcountry board adds 5 miles to the one-way total. The trail exits the park's south boundary at Thermal Canyon near I-10. Horses are not permitted on this trail.

REHABILITATION

PHASE I — New trails or trails that require significant work to define the route and make passable, prevent severe erosion, and post signs		**PHASE II** — Bring established trails up to park standards, stabilize, and sign.	
TRAIL	**COST**	**TRAIL**	**COST**
Boy Scout Trail (couple areas)	6,000	West Side Loop	5,000
Canyon View/Cliff Trail	150,000	Black Rock Canyon/ Panorama/ Morongo	5,000
Covington Crest	1,000	Short Loop/ Fault	10,000
Quail Springs Hist. Tr./Wash	1,500	Eureka Peak	12,500
Johnny Lang Connector	15,000	Boundary E and W	2,500
West Entrance Access	1,000	Deerhorn	7,500
Maze/Window Loop	2,000	Covington Loop	8,000
Squaw Tank	4,000	Bigfoot	33,000
Ryan/Johnny Lang Connector	2,500	Bigfoot Spur	1,000
Cap Rock	3,000	Mary Trail	2,000
Ryan Mtn. Loop	10,000	Samuelson West	4,500
Lost Horse Valley	5,000	Panorama	7,000
North Entrance Access	1,000	Burro/ Rocky View	7,500
Split Rock Loop	10,000	Big Pine	7,500
Wonderland Connection	7,000	Lost Horse Loop	30,000
CRH (small portions)	30,000	Stubbe Springs Loop	5,000
Borrow Pit Staging Area	40,000	Old Queen Valley Hist. Rt.	7,500
		Pine City	3,000
		Lucky Boy/ Queen Mine Loop	7,500
		Contact Mine	3,000
		Wall Street Mill	1,000
		Forty Nine Palm	5,000
		Hexahedron Mine	3,000
Subtotal	289,000	**Subtotal**	177,500
TOTAL: 466,500			

Executive Order

Withdrawal of Public Lands for Classification

California

By virtue of the authority vested in me by the act of June 25, 1910 (ch. 421, 36 Stat. 847–848), as amended by the act of August 24, 1912 (ch. 369, 37 Stat. 497), it is hereby ordered that the surveyed and unsurveyed public lands within the following-described area in the State of California be, and the same are hereby, temporarily withdrawn for classification and pending determination as to the advisability of including such lands in a national monument, subject to the conditions of the aforesaid acts, to valid existing rights, and to the provisions of existing withdrawals affecting certain of such lands, including withdrawals made under the act of June 17, 1902 (ch. 1093, 32 Stat. 388–390), in connection with the Colorado River storage project:

San Bernardino Meridian

T. 1 S., R. 4 E., secs. 19 to 36, inclusive;
T. 1 S., R. 5 E., secs. 19 to 36, inclusive;
T. 1 S., R. 6 E., secs. 19 to 36, inclusive;
T. 1 S., R. 7 E., secs. 19 to 36, inclusive;
T. 1 S., R. 8 E., secs. 19 to 36, inclusive;
T. 1 S., R. 9 E., secs. 19 to 36, inclusive (unsurveyed);
Tps. 1 S., Rs. 10 to 15 E., inclusive (part unsurveyed);
Tps. 2 S., Rs. 4 to 15 E., inclusive (part unsurveyed);
T. 3 S., R. 5 E., secs. 1 to 3 and secs. 10 to 12, inclusive;
T. 3 S., R. 6 E., secs. 1 to 18, inclusive, and secs. 23 and 24;
T. 3 S., R. 7 E., secs. 1 to 24, secs. 25 to 27, and secs. 34 to 36, inclusive;
Tps. 3 S., Rs. 8 to 15 E., inclusive (part unsurveyed);
T. 4 S., R. 7 E., secs. 1 to 3 and secs. 10 to 12, inclusive;
Tps. 4 S., Rs. 8 to 15 E., inclusive (part unsurveyed);
T. 5 S., R. 8 E., secs. 1 to 3 and secs. 10 to 12, inclusive;
Tps. 5 S., Rs. 9 to 13 E., inclusive (part unsurveyed);
T. 6 S., R. 9 E., secs. 1 to 17, secs. 21 to 27, inclusive, and secs. 35 and 36;
Tps. 6 S., Rs. 10 to 12 E., inclusive;
T. 7 S., R. 10 E., secs. 1 to 16 and secs. 23 to 26, inclusive, and sec. 36;
Tps. 7 S., Rs. 11 and 12 E.;

containing approximately 1,136,000 acres.

This order shall continue in full force and effect unless and until revoked by the President or by act of Congress.

FRANKLIN D. ROOSEVELT.

The White House,
October 25, 1933.

[No. 6361]

45. Joshua Tree National Monument

Establishment: Proclamation (No. 2193) of August 10, 1936..... Page 218

BY THE PRESIDENT OF THE UNITED STATES OF AMERICA

A PROCLAMATION

[No. 2193—Aug. 10, 1936—50 Stat. 1760]

WHEREAS certain public lands in the State of California contain historic and prehistoric structures, and have situated thereon various objects of historic and scientific interest; and

WHEREAS it appears that it would be in the public interest to reserve such lands as a national monument, to be known as the Joshua Tree National Monument:

NOW, THEREFORE, I, Franklin D. Roosevelt, President of the United States of America, under and by virtue of the authority vested in me by section 2 of the act of June 8, 1906, ch. 3060, 34 Stat. 225 (U. S. C., title 16, sec. 431), do proclaim that, subject to existing rights and prior withdrawals, the following-described lands in California are hereby reserved from all forms of appropriation under the public-land laws and set apart as the Joshua Tree National Monument:

SAN BERNARDINO MERIDIAN

T. 1 S., R. 5 E., secs. 19 to 36, inclusive.
T. 2 S., R. 5 E., secs. 1 to 6, 11 to 13, inclusive, and those parts of secs. 7, 8, 9, 10, 14, 15 and 24 lying north of the north boundary of the Colorado River Aqueduct right-of-way.
T. 1 S., R. 6 E., secs. 19 to 36, inclusive.
T. 2 S., R. 6 E., secs. 1 to 18, 21 to 26, inclusive, and those parts of secs. 19, 20, 27, 28, 34, 35 and 36 lying north of aqueduct right-of-way.
T. 3 S., R. 6 E., that part of sec. 1 lying north of aqueduct right-of-way.
Ts. 1 and 2 S., R. 7 E. (Partly unsurveyed).
T. 3 S., R. 7 E., secs. 1 to 6, 8 to 16, 23 to 24, inclusive, and those parts of secs. 7, 17, 18, 21, 22, 25 and 26 lying north of aqueduct right-of-way.
Ts. 1 and 2 S., R. 8 E. (partly unsurveyed).
T. 3 S., R. 8 E., secs. 1 to 30, 33 to 36, inclusive, and those parts of secs. 31 and 32 lying north of aqueduct right-of-way.
T. 4 S., R. 8 E., those parts of secs. 4 and 5 lying north of aqueduct right-of-way.
T. 1 S., R. 9 E., secs. 5 to 9 and 16 to 36, inclusive.
Ts. 2 and 3 S., R. 9 E. (partly unsurveyed).
Ts. 1 to 3 S., R. 10 E. (partly unsurveyed).
T. 5 S., R. 10 E., secs. 1 to 30, inclusive, and those parts of secs. 31 to 36 lying north of aqueduct right-of-way.
Ts. 1 to 4 S., R. 11 E. (partly unsurveyed).
T. 5 S., R. 11 E., secs. 1 to 30 and 32 to 36, inclusive, and that part of sec. 31 lying north of aqueduct right-of-way.

T. 6 S., R 11 E., those parts of secs. 1 to 6 lying north of aqueduct right-of-way.
Ts. 1 to 5 S., R. 12 E. (partly unsurveyed).
T. 6 S., R. 12 E., those parts of secs. 1 to 6 lying north of aqueduct right- of-way.
Ts. 1 to 4 S., R. 13 E. (partly unsurveyed).
T. 5 S., R. 13 E., secs. 1 to 24, inclusive, and those parts of secs. 28, 29, 30 and 31 lying north of aqueduct right-of-way (partly unsurveyed).
Ts. 1 to 3 S., R. 14 E. (partly unsurveyed).
T. 4 S., R. 14 E., secs. 1 to 11, 14 to 23, 27 to 34, inclusive, and those parts of secs. 12, 13, 24, 25, 26 and 35 lying west of aqueduct right-of-way (unsurveyed).
Ss. 1 and 2 S., R. 15 E. (partly unsurveyed).
T. 3 S., R. 15 E., secs. 1 to 19, inclusive, and sec. 24; those parts of secs. 20, 21, 22, 23, 25, 26, 29, 30 and 31 lying north of aqueduct right-of-way (partly unsurveyed).
T. 4 S., R. 15 E., those parts of secs. 6 and 7 lying west of aqueduct right-of-way;

containing approximately 825,340 acres.

Warning is hereby expressly given to all unauthorized persons not to appropriate, injure, destroy, or remove any feature of this monument and not to locate or settle upon any of the lands thereof.

The Director of the National Park Service, under the direction of the Secretary of the Interior, shall have the supervision, management, and control of the monument as provided in the act of Congress entitled "An Act To establish a National Park Service, and for other purposes," approved August 25, 1916 (ch. 408, 39 Stat. 535, U. S. C., title 16, secs. 1 and 2), and acts supplementary thereto or amendatory thereof.

IN WITNESS WHEREOF, I have hereunto set my hand and caused the seal of the United States to be affixed.

DONE at the City of Washington this 10th day of August, in the year of our Lord nineteen hundred and thirty-six and of the Independence of the United States of America the one hundred and sixty-first.

[SEAL]

FRANKLIN D. ROOSEVELT.

By the President:
WILLIAM PHILLIPS,
Acting Secretary of State.

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[PUBLIC LAW 837—81ST CONGRESS]
[CHAPTER 1030—2D SESSION]

[H. R. 7034]

AN ACT

To reduce and revise the boundaries of the Joshua Tree National Monument in the State of California, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That Joshua Tree National Monument, in the State of California, established by Proclamation Numbered 2193, of August 10, 1936 (50 Stat. 1760), hereafter shall comprise the following-described area:

SAN BERNARDINO MERIDIAN

Township 1 south, range 5 east, sections 22 to 27, inclusive, and sections 34 to 36, inclusive; township 2 south range 5 east, portion of east half lying north of the north right-of-way line of the Colorado River aqueduct but excluding therefrom that portion of the Long Canyon Camp and dump area in section 27; township 1 south, range 6 east, sections 19 to 36, inclusive; township 2 south, range 6 east, sections 1 to 30, inclusive, that portion of section 31 lying north of the north right-of-way line of the Colorado River aqueduct, and sections 32 to 36, inclusive; township 3 south, range 6 east, portion lying north of the north right-of-way line of the Colorado River aqueduct but excluding therefrom that portion of the Deception Camp and dump area in section 14, that portion of the West Deception Camp and dump area in section 10, and the portions of the East Wide Canyon Camps and dump areas in sections 5 and 6; township 1 south, range 7 east, sections 1 to 4, inclusive, and 9 to 15, inclusive, unsurveyed, section 16, sections 19 to 23, inclusive, section 24, unsurveyed, and sections 25 to 36, inclusive; township 2 south, range 7 east; township 3 south, range 7 east, portion lying north of the north right-of-way line of the Colorado River aqueduct but excluding therefrom that portion of the Fan Hill Camp and dump area in section 20; township 1 south, range 8 east, partly unsurveyed; townships 2 and 3 south, range 8 east; township 1 south, range 9 east, sections 5 to 9, inclusive, sections 16 to 23, inclusive, and sections 26 to 35, inclusive; township 2 south, range 9 east, sections 2 to 11, inclusive, and sections 14 to 36, inclusive, partly unsurveyed; township 3 south, range 9 east; township 4 south, range 9 east, sections 1 to 5, inclusive, and sections 11 to 14, inclusive; township 2 south, range 10 east, sections 25 to 36, inclusive, unsurveyed; township 3 south, range 10 east, partly unsurveyed; township 4 south, range 10 east, sections 1 to 18, inclusive, sections 22 to 26, inclusive, and sections 35 and 36; township 5 south, range 10 east, section 1; township 2 south, range 11 east, sections 25 to 36, inclusive, unsurveyed; townships 3 and 4 south, range 11 east, partly unsurveyed; township 5 south, range 11 east, sections 1 to 18, inclusive, sections 22 to 27, inclusive, and sections 34, 35, and 36;

[CHAPTER 1030]

AN ACT

To reduce and revise the boundaries of the Joshua Tree National Monument in the State of California, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That Joshua Tree National Monument, in the State of California, established by Proclamation Numbered 2193, of August 10, 1936 (50 Stat. 1760), hereafter shall comprise the following-described area:

Joshua Tree National Monument, Calif.

SAN BERNARDINO MERIDIAN

Township 1 south, range 5 east, sections 22 to 27, inclusive, and sections 34 to 36, inclusive; township 2 south, range 5 east, portion of east half lying north of the north right-of-way line of the Colorado River aqueduct but excluding therefrom that portion of the Long Canyon Camp and dump area in section 27; township 1 south, range 6 east, sections 19 to 36, inclusive; township 2 south, range 6 east, sections 1 to 30, inclusive, that portion of section 31 lying north of the north right-of-way line of the Colorado River aqueduct, and sections 32 to 36, inclusive; township 3 south, range 6 east, portion lying north of the north right-of-way line of the Colorado River aqueduct but excluding therefrom that portion of the Deception Camp and dump area in section 14, that portion of the West Deception Camp and dump area in section 10, and the portions of the East Wide Canyon Camps and dump areas in sections 5 and 6; township 1 south, range 7 east, sections 1 to 4, inclusive, and 9 to 15, inclusive, unsurveyed, section 16, sections 19 to 23, inclusive, section 24, unsurveyed, and sections 25 to 36, inclusive; township 2 south, range 7 east; township 3 south, range 7 east, portion lying north of the north right-of-way line of the Colorado River aqueduct but excluding therefrom that portion of the Fan Hill Camp and dump area in section 20; township 1 south, range 8 east, partly unsurveyed; townships 2 and 3 south, range 8 east; township 1 south, range 9 east, sections 5 to 9, inclusive, sections 16 to 23, inclusive, and sections 26 to 35, inclusive; township 2 south, range 9 east, sections 2 to 11, inclusive, and sections 14 to 36, inclusive, partly unsurveyed; township 3 south, range 9 east; township 4 south, range 9 east, sections 1 to 5, inclusive, and sections 11 to 14, inclusive; township 2 south, range 10 east, sections 25 to 36, inclusive, unsurveyed; township 3 south, range 10 east, partly unsurveyed; township 4 south, range 10 east, sections 1 to 18, inclusive, sections 22 to 26, inclusive, and sections 35 and 36; township 5 south, range 10 east, section 1; township 2 south, range 11 east, sections 25 to 36, inclusive, unsurveyed; townships 3 and 4 south, range 11 east, partly unsurveyed; township 5 south, range 11 east, sections 1 to 18, inclusive, sections 22 to 27, inclusive, and sections 34, 35, and 36; township 6 south, range 11 east, portion of sections 1, 2, and 3 lying north of north transmission line right-of-way which is adjacent to the north right-of-way line of the Colorado River aqueduct but excluding therefrom the Aggregate Deposit in section 3; township 2 south, range 12 east, section 13 and sections 23 to 36, inclusive, partly unsurveyed; townships 3 and 4 south, range 12 east, partly unsurveyed; township 5 south, range 12 east, sections 1 to 24, inclusive, and sections 26 to 34, inclusive, partly unsurveyed, and portions of sections 25 and 35 lying north of north transmission line right-of-way which is adjacent to the north right-of-way line of the Colorado River aqueduct; township 6 south, range 12 east, portions of sections 2, 3, 4, 5, 6, and 10, lying north of north transmission line right-of-way which is adjacent to the north right-of-way line of the Colorado River aqueduct, but excluding therefrom the Bumpani's Aggregate Deposit in section 4; township 2 south, range 13 east, sections 1 and 2 and sections 7 to 36, inclusive, partly unsurveyed; township 3 south, range 13 east, sections 1 to 18, inclusive, partly unsurveyed; township 5 south, range 13 east, sections 6, 7, 18, and 19, unsurveyed; township 1 south, range 14 east, sections 33 to 36, inclusive, partly unsurveyed; township 2

township 6 south, range 11 east, portion of sections 1, 2, and 3 lying north of north transmission line right-of-way which is adjacent to the north right-of-way line of the Colorado River aqueduct but excluding therefrom the Aggregate Deposit in section 3; township 2 south, range 12 east, section 13 and sections 23 to 36, inclusive, partly unsurveyed; townships 3 and 4 south, range 12 east, partly unsurveyed; township 5 south, range 12 east, sections 1 to 24, inclusive, and sections 26 to 34, inclusive, partly unsurveyed, and portions of sections 25 and 35 lying north of north transmission line right-of-way which is adjacent to the north right-of-way line of the Colorado River aqueduct; township 6 south, range 12 east, portions of sections 2, 3, 4, 5, 6, and 10, lying north of north transmission line right-of-way which is adjacent to the north right-of-way line of the Colorado River aqueduct, but excluding therefrom the Bumpani's Aggregate Deposit in section 4; township 2 south, range 13 east, sections 1 and 2 and sections 7 to 36, inclusive, partly unsurveyed; township 3 south, range 13 east, sections 1 to 18, inclusive, partly unsurveyed; township 5 south, range 13 east, sections 6, 7, 18, and 19, unsurveyed; township 1 south, range 14 east, sections 33 to 36, inclusive, partly unsurveyed; township 2 south, range 14 east, partly unsurveyed; township 3 south, range 14 east, sections 1 to 18, inclusive, partly unsurveyed; township 1 south, range 15 east, sections 31 to 35, inclusive, partly unsurveyed; township 2 south, range 15 east, sections 2 to 36, inclusive, partly unsurveyed; township 3 south, range 15 east, sections 1 to 12, inclusive, partly unsurveyed, and section 18, unsurveyed; township 2 south, range 16 east, sections 18, 19, 30, and 31, unsurveyed; and township 3 south, range 16 east, sections 6 and 7 unsurveyed.

SEC. 2. All public-domain lands heretofore included within the Joshua Tree National Monument which are eliminated from the National Monument by this Act are hereby opened to location, entry, and patenting under the United States mining laws: *Provided*, That such public-domain lands or portions thereof shall be restored to application and entry under other applicable public land laws, including the mineral leasing laws.

SEC. 3. All leases, permits, and licenses issued or authorized by any department, establishment, or agency of the United States, with respect to the Federal lands excluded from the Joshua Tree National Monument by this Act, which are in effect on the date of the approval of this Act shall continue in effect, subject to compliance with the terms and conditions therein set forth, until terminated in accordance with the provisions thereof.

SEC. 4. The Secretary of the Interior is authorized and directed, through the Bureau of Mines, the Geological Survey, and the National Park Service, to cause a survey to be made of the area within the revised boundaries of the Joshua Tree National Monument with a view to determining to what extent the said area is more valuable for minerals than for the National Monument purposes for which it was created. Report of said survey shall be filed with the President of the United States Senate and the Speaker of the House of Representatives on or before February 1, 1951.

Approved September 25, 1950.

south, range 14 east, partly unsurveyed; township 3 south, range 14 east, sections 1 to 18, inclusive, partly unsurveyed; township 1 south, range 15 east, sections 31 to 35, inclusive, partly unsurveyed; township 2 south, range 15 east, sections 2 to 36, inclusive, partly unsurveyed; township 3 south, range 15 east, sections 1 to 12, inclusive, partly unsurveyed, and section 18, unsurveyed; township 2 south, range 16 east, sections 18, 19, 30, and 31, unsurveyed; and township 3 south, range 16 east, sections 6 and 7 unsurveyed.

Certain public-domain lands.

SEC. 2. All public-domain lands heretofore included within the Joshua Tree National Monument which are eliminated from the National Monument by this Act are hereby opened to location, entry, and patenting under the United States mining laws: *Provided*, That such public-domain lands or portions thereof shall be restored to application and entry under other applicable public land laws, including the mineral leasing laws.

Prior leases, etc.

SEC. 3. All leases, permits, and licenses issued or authorized by any department, establishment, or agency of the United States, with respect to the Federal lands excluded from the Joshua Tree National Monument by this Act, which are in effect on the date of the approval of this Act shall continue in effect, subject to compliance with the terms and conditions therein set forth, until terminated in accordance with the provisions thereof.

Survey.

SEC. 4. The Secretary of the Interior is authorized and directed, through the Bureau of Mines, the Geological Survey, and the National Park Service, to cause a survey to be made of the area within the revised boundaries of the Joshua Tree National Monument with a view to determining to what extent the said area is more valuable for minerals than for the National Monument purposes for which it was created. Report of said survey shall be filed with the President of the United States Senate and the Speaker of the House of Representatives on or before February 1, 1951.

Approved September 25, 1950.

Public Law 87-80

AN ACT

June 30, 1961
[H. R. 5416]

To include within the boundaries of Joshua Tree National Monument, in the State of California, certain federally owned lands used in connection with said monument, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That the Act of September 25, 1950, chapter 1030 (64 Stat. 1033; 16 U.S.C. 450ii), is hereby amended by inserting after the period at the end of section 1 the following: "Also, all that portion of the south half of the northeast quarter and of the north half of the southeast quarter of section 33, township 1 north, range 9 east, San Bernardino base and meridian, in the county of San Bernardino, State of California, shown on map titled 'Record of Survey' by H. F. Cameron, Junior, licensed engineer 6826, dated December 29, 1948, and James B. Hommon, licensed engineer 6916, dated October 5, 1949, and made for the National Park Service, Department of the Interior, and recorded October 17, 1949, in volume 7, page 72, of the official records of the county of San Bernardino, said land being described as follows:

Joshua Tree National Monument, Calif.

"Beginning at the United States Government Land Office monument marked as the east quarter corner of said section 33, thence proceeding on a true bearing south 89 degrees 02 minutes 10 seconds west a distance of 50.01 feet to the true point of beginning of the hereinafter described parcel of land;

"Thence north 0 degrees 02 minutes 55 seconds west a distance of 250.08 feet to a point of curve; thence along the arc of a curve to the left having a radius of 20.00 feet a distance of 31.73 feet to a point of tangency; thence south 89 degrees 02 minutes 40 seconds west a distance of 2,559.24 feet; thence south 0 degrees 19 minutes 50 seconds east a distance of 270.76 feet;

"Thence south 0 degrees 21 minutes 02 seconds east a distance of 409.32 feet to the beginning of a curve; thence along the arc of a curve to the left having a radius of 280.98 feet a distance of 275.93 feet to a point of compound curvature; thence along the arc of a curve to the left having a radius of 800.00 feet a distance of 753.98 feet to a point of tangency; thence north 69 degrees 22 minutes 58 seconds east a distance of 125.31 feet to the beginning of a curve;

"Thence along the arc of a curve to the right having a radius of 1,400.00 feet a distance of 1,042.74 feet to a point of tangency; thence south 67 degrees 56 minutes 33 seconds east a distance of 94.55 feet to the beginning of a curve; thence along the arc of a curve to the left having a radius of 700.00 feet a distance of 366.52 feet to a point of compound curvature;

"Thence along the arc of a curve to the left having a radius of 167.60 feet a distance of 240.17 feet to a point of tangency; thence north 0 degrees 02 minutes 55 seconds west a distance of 648.91 feet to the point of beginning containing 57.839 acres, more or less."

Approved June 30, 1961.

PUBLIC LAW 94-567 [H.R. 13160]: Oct. 20, 1976

NATIONAL PARK SYSTEM—WILDERNESS DESIGNATED

An Act to designate certain lands within units of the National Park System as wilderness; to revise the boundaries of certain of those units; and for other purposes.

Wilderness areas Designation. 16 USC 1132 note.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That in accordance with section 3(c) of the Wilderness Act (78 Stat. 890; 16 U.S.C. 1132(c)), the following lands are hereby designated as wilderness, and shall be administered by the Secretary of the Interior in accordance with the applicable provisions of the Wilderness Act:

Joshua Tree National Monument, Calif.

(g) Joshua Tree National Monument, California, wilderness comprising four hundred and twenty-nine thousand six hundred and ninety acres, and potential wilderness additions comprising thirty-seven thousand five hundred and fifty acres, depicted on a map entitled "Wilderness Plan, Joshua Tree National Monument, California", numbered 156-20,003-D and dated May 1976, to be known as the Joshua Tree Wilderness.

Map and description, public inspection.

SEC. 2. A map and description of the boundaries of the areas designated in this Act shall be on file and available for public inspection in the office of the Director of the National Park Service, Department of the Interior, and in the office of the Superintendent of each area designated in the Act. As soon as practicable after this Act takes effect, maps of the wilderness areas and descriptions of their boundaries shall be filed with the Interior and Insular Affairs Committees of the United States Senate and House of Representatives, and such maps and descriptions shall have the same force and effect as if included in this Act: *Provided*, That correction of clerical and typographical errors in such maps and descriptions may be made.

Publication in Federal Register. 16 USC 1131 note.

SEC. 3. All lands which represent potential wilderness additions, upon publication in the Federal Register of a notice by the Secretary of the Interior that all uses thereon prohibited by the Wilderness Act have ceased, shall thereby be designated wilderness.

Boundary revision.

SEC. 4. The boundaries of the following areas are hereby revised, and those lands depicted on the respective maps as wilderness or as potential wilderness addition are hereby so designated at such time and in such manner as provided for by this Act:

Public Law 94-567
94th Congress

An Act

Oct. 20, 1976
[H.R. 13160]

To designate certain lands within units of the National Park System as wilderness; to revise the boundaries of certain of those units; and for other purposes.

Wilderness areas. Designation. 16 USC 1132 note.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That in accordance with section 3(c) of the Wilderness Act (78 Stat. 890; 16 U.S.C. 1132(c)), the following lands are hereby designated as wilderness, and shall be administered by the Secretary of the Interior in accordance with the applicable provisions of the Wilderness Act:

Bandelier National Monument, N. Mex.

(a) Bandelier National Monument, New Mexico, wilderness comprising twenty-three thousand two hundred and sixty-seven acres, depicted on a map entitled "Wilderness Plan, Bandelier National Monument, New Mexico", numbered 315-20,014-B and dated May 1976, to be know as the Bandelier Wilderness.

Gunnison National Monument, Colo.

(b) Black Canyon of the Gunnison National Monument, Colorado, wilderness comprising eleven thousand one hundred and eighty acres, depicted on a map entitled "Wilderness Plan, Black Canyon of the Gunnison National Monument, Colorado", numbered 144-20,017 and dated May 1973, to be known as the Black Canyon of the Gunnison Wilderness.

Chiricahua National Monument, Ariz.

(c) Chiricahua National Monument, Arizona, wilderness comprising nine thousand four hundred and forty acres, and potential wilderness additions comprising two acres, depicted on a map entitled "Wilderness Plan, Chiricahua National Monument, Arizona", numbered 145-20,007-A and dated September 1973, to be known as the Chiricahua National Monument Wilderness.

Great Sand Dunes National Monument, Colo.

(d) Great Sand Dunes National Monument, Colorado, wilderness comprising thirty-three thousand four hundred and fifty acres, and potential wilderness additions comprising six hundred and seventy acres, depicted on a map entitled "Wilderness Plan, Great Sand Dunes National Monument, Colorado", numbered 140-20,006-C and dated February 1976, to be known as the Great Sand Dunes Wilderness.

Haleakala National Park, Hawaii.

(e) Haleakala National Park, Hawaii, wilderness comprising nineteen thousand two hundred and seventy acres, and potential wilderness additions comprising five thousand five hundred acres, depicted on a map entitled "Wilderness Plan, Haleakala National Park, Hawaii", numbered 162-20,006-A and dated July 1972, to be known as the Haleakala Wilderness.

Isle Royale National Park, Mich.

(f) Isle Royale National Park, Michigan, wilderness comprising one hundred and thirty-one thousand eight hundred and eighty acres, and potential wilderness additions comprising two hundred and thirty-one acres, depicted on a map entitled "Wilderness Plan, Isle Royale National Park, Michigan", numbered 139-20,004 and dated December 1974, to be known as the Isle Royale Wilderness.

Joshua Tree National Monument, Calif.

(g) Joshua Tree National Monument, California, wilderness comprising four hundred and twenty-nine thousand six hundred and ninety acres, and potential wilderness additions comprising thirty-seven thousand five hundred and fifty acres, depicted on a map entitled

"Wilderness Plan, Joshua Tree National Monument, California", numbered 156-20,003-D and dated May 1976, to be known as the Joshua Tree Wilderness.

(h) Mesa Verde National Park, Colorado, wilderness comprising eight thousand one hundred acres, depicted on a map entitled "Wilderness Plan, Mesa Verde National Park, Colorado", numbered 307-20,007-A and dated September 1972, to be known as the Mesa Verde Wilderness. Mesa Verde National Park, Colo.

(i) Pinnacles National Monument, California, wilderness comprising twelve thousand nine hundred and fifty-two acres, and potential wilderness additions comprising nine hundred and ninety acres, depicted on a map entitled "Wilderness Plan, Pinnacles National Monument, California", numbered 114-20,010-D and dated September 1975, to be known as the Pinnacles Wilderness. Pinnacles National Monument, Calif.

(j) Saguaro National Monument, Arizona, wilderness comprising seventy-one thousand four hundred acres, depicted on a map entitled "Wilderness Plan, Saguaro National Mounment, Arizona", numbered 151-20,003-D and dated May 1976, to be known as the Saguaro Wilderness. Saguaro National Monument, Ariz.

(k) Point Reyes National Seashore, California, wilderness comprising twenty-five thousand three hundred and seventy acres, and potential wilderness additions comprising eight thousand and three acres, depicted on a map entitled "Wilderness Plan, Point Reyes National Seashore", numbered 612-90,000-B and dated September 1976, to be known as the Point Reyes Wilderness. Point Reyes National Seashore, Calif.

(l) Badlands National Monument, South Dakota, wilderness comprising sixty-four thousand two hundred and fifty acres, depicted on a map entitled "Wilderness Plan, Badlands National Monument, South Dakota", numbered 137-29,010-B and dated May 1976, to be known as the Badlands Wilderness. Badlands National Monument, S. Dak.

(m) Shenandoah National Park, Virginia, wilderness comprising seventy-nine thousand and nineteen acres, and potential wilderness additions comprising five hundred and sixty acres, depicted on a map entitled "Wilderness Plan, Shenandoah National Park, Virginia", numbered 134-90,001 and dated June 1975, to be known as the Shenandoah Wilderness. Shenandoah National Park, Va.

SEC. 2. A map and description of the boundaries of the areas designated in this Act shall be on file and available for public inspection in the office of the Director of the National Park Service, Department of the Interior, and in the office of the Superintendent of each area designated in the Act. As soon as practicable after this Act takes effect, maps of the wilderness areas and descriptions of their boundaries shall be filed with the Interior and Insular Affairs Committees of the United States Senate and House of Representatives, and such maps and descriptions shall have the same force and effect as if included in this Act: *Provided*, That correction of clerical and typographical errors in such maps and descriptions may be made. Map and description, public inspection.

SEC. 3. All lands which represent potential wilderness additions, upon publication in the Federal Register of a notice by the Secretary of the Interior that all uses thereon prohibited by the Wilderness Act have ceased, shall thereby be designated wilderness. Publication in Federal Register. 16 USC 1131 note.

SEC. 4. The boundaries of the following areas are hereby revised, and those lands depicted on the respective maps as wilderness or as potential wilderness addition are hereby so designated at such time and in such manner as provided for by this Act: Boundary revision.

Isle Royale National Park, Mich.

(a) Isle Royale National Park, Michigan:

The Act of March 6, 1942 (56 Stat. 138; 16 U.S.C. 408c-408h), as amended, is further amended as follows:

(1) Insert the letter "(a)" before the second paragraph of the first section, redesignate subparagraphs (a), (b), and (c) of that paragraph as "(1)", "(2)", "(3)", respectively, and add to that section the following new paragraph:

"(b) Gull Islands, containing approximately six acres, located in section 19, township 68 north, range 31 west, in Keweenaw County, Michigan.".

16 USC 408g.

(2) Amend section 3 to read as follows:

"SEC. 3. The boundaries of the Isle Royale National Park are hereby extended to include any submerged lands within the territorial jurisdiction of the United States within four and one-half miles of the shoreline of Isle Royale and the surrounding islands, including Passage Island and the Gull Islands, and the Secretary of the Interior is hereby authorized, in his discretion, to acquire title by donation to any such lands not now owned by the United States, the title to be satisfactory to him.".

Pinnacles National Monument, Calif.

(b) Pinnacles National Monument, California:

(1) The boundary is hereby revised by adding the following described lands, totaling approximately one thousand seven hundred and seventeen and nine-tenths acres:

(a) Mount Diablo meridian, township 17 south, range 7 east: Section 1, east half east half, southwest quarter northeast quarter, and northwest quarter southeast quarter; section 12, east half northeast quarter, and northeast quarter southeast quarter; section 13, east half northeast quarter and northeast quarter southeast quarter.

(b) Township 16 south, range 7 east: Section 32, east half.

(c) Township 17 south, range 7 east: Section 4, west half; section 5, east half.

(d) Township 17 south, range 7 east: Section 6, southwest quarter southwest quarter; section 7, northwest quarter north half southwest quarter.

Publication in Federal Register.

(2) The Secretary of the Interior may make minor revisions in the monument boundary from time to time by publication in the Federal Register of a map or other boundary description, but the total area within the monument may not exceed sixteen thousand five hundred acres: *Provided, however*, That lands designated as wilderness pursuant to this Act may not be excluded from the monument. The monument shall hereafter be administered in accordance with the Act of August 25, 1916 (39 Stat. 535; 16 U.S.C. 1 et seq.), as amended and supplemented.

(3) In order to effectuate the purposes of this subsection, the Secretary of the Interior is authorized to acquire by donation, purchase, transfer from any other Federal agency or exchange, lands and interests therein within the area hereafter encompassed by the monument boundary, except that property owned by the State of California or any political subdivision thereof may be acquired only by donation.

Appropriation authorization.

(4) There are authorized to be appropriated, in addition to such sums as may heretofore have been appropriated, not to exceed $955,000 for the acquisition of lands or interests in lands authorized by this subsection. No funds authorized to be appropriated pursuant to this Act shall be available prior to October 1, 1977.

SEC. 5. (a) The Secretary of Agriculture shall, within two years after the date of enactment of this Act, review, as to its suitability or nonsuitability for preservation as wilderness, the area comprising approximately sixty-two thousand nine hundred and thirty acres located in the Coronado National Forest adjacent to Saguaro National Monument, Arizona, and identified on the map referred to in section 1(j) of this Act as the "Rincon Wilderness Study Area," and shall report his findings to the President. The Secretary of Agriculture shall conduct his review in accordance with the provisions of subsections 3(b) and 3(d) of the Wilderness Act, except that any reference in such subsections to areas in the national forests classified as "primitive" on the effective date of that Act shall be deemed to be a reference to the wilderness study area designated by this Act and except that the President shall advise the Congress of his recommendations with respect to this area within two years after the date of enactment of this Act.

Rincon Wilderness Study Area, suitability review.
16 USC 1132 note.

Report to President.
16 USC 1132.

(b) The Secretary of Agriculture shall give at least sixty days' advance public notice of any hearing or other public meeting relating to the review provided for by this section.

Notice and hearing.

SEC. 6. The areas designated by this Act as wilderness shall be administered by the Secretary of the Interior in accordance with the applicable provisions of the Wilderness Act governing areas designated by that Act as wilderness areas, except that any reference in such provisions to the effective date of the Wilderness Act shall be deemed to be a reference to the effective date of this Act, and, where appropriate, any reference to the Secretary of Agriculture shall be deemed to be a reference to the Secretary of the Interior.

Administration.

SEC. 7. (a) Section 6(a) of the Act of September 13, 1962 (76 Stat. 538), as amended (16 U.S.C. 459c–6a) is amended by inserting "without impairment of its natural values, in a manner which provides for such recreational, educational, historic preservation, interpretation, and scientific research opportunities as are consistent with, based upon, and supportive of the maximum protection, restoration and preservation of the natural environment with the area" immediately after "shall be administered by the Secretary".

16 USC 459c–6.

(b) Add the following new section 7 and redesignate the existing section 7 as section 8:

16 USC 459c–7.

"SEC. 7. The Secretary shall designate the principal environmental education center within the Seashore as 'The Clem Miller Environmental Education Center,' in commemoration of the vision and leadership which the late Representative Clem Miller gave to the creation and protection of Point Reyes National Seashore.".

The Clem Miller Environmental Education Center, designation.
16 USC 459c–6a.

SEC. 8. Notwithstanding any other provision of law, any designation of the lands in the Shoshone National Forest, Wyoming, known as the Whiskey Mountain Area, comprising approximately six thousand four hundred and ninety-seven acres and depicted as the "Whiskey Mountain Area—Glacier Primitive Area" on a map entitled "Proposed Glacier Wilderness and Glacier Primitive Area", dated September 23, 1976, on file in the Office of the Chief, Forest Service, Department of Agriculture, shall be classified as a primitive area until the Secretary of Agriculture or his designee determines otherwise pursuant to classification procedures for national forest primitive areas. Provisions of any other Act designating the Fitspatrick Wil-

Whiskey Mountain Area, classification as a primitive area.

derness in said Forest shall continue to be effective only for the approximately one hundred and ninety-one thousand one hundred and three acres depicted as the "Proposed Glacier Wilderness" on said map.

Approved October 20, 1976.

LEGISLATIVE HISTORY:

HOUSE REPORT No. 94-1427 (Comm. on Interior and Insular Affairs).
SENATE REPORT No. 94-1357 (Comm. on Interior and Insular Affairs).
CONGRESSIONAL RECORD, Vol. 122 (1976):
Sept. 22, considered and passed House.
Oct. 1, considered and passed Senate, amended; House agreed to Senate amendments.

law enforcement, and the protection and management of National Park resources and values.

(2) Vacancies in the advisory commission shall be filled by the Secretary so as to maintain the full diversity of views required to be represented on the advisory commission.

(c) The Federal Advisory Committee Act shall apply to the procedures and activities of the advisory commission.

(d) The advisory commission shall cease to exist ten years after the date of its establishment.

SEC. 308. BOUNDARY ADJUSTMENT.

In preparing the maps and legal descriptions required by sections 304 and 602 of this Act, the Secretary shall adjust the boundaries of the Death Valley National Park and Death Valley National Park Wilderness so as to exclude from such National Park and Wilderness the lands generally depicted on the map entitled "Porter Mine (Panamint Range) Exclusion Area" dated June 1994.

TITLE IV - JOSHUA TREE NATIONAL PARK.

SEC. 401. FINDINGS.

The Congress finds that--

(1) a proclamation by President Franklin Roosevelt in 1936 established Joshua Tree National Monument to protect various objects of historical and scientific interest;

(2) Joshua Tree National Monument today is recognized as a major unit of the National Park System, having extraordinary values enjoyed by millions of visitors;

(3) the monument boundaries as modified in 1950 and 1961 exclude and thereby expose to incompatible development and inconsistent management, contiguous Federal lands of

essential and superlative natural, ecological, archeological, paleontological, cultural, historical, and wilderness values;

(4) Joshua Tree National Monument should be enlarged by the addition of contiguous Federal lands of national park caliber, and afforded full recognition and statutory protection as a National Park; and

(5) the nondesignated wilderness within Joshua Tree should receive statutory protection by designation pursuant to the Wilderness Act.

SEC. 402. ESTABLISHMENT OF JOSHUA TREE NATIONAL PARK.

There is hereby established the Joshua Tree National Park, (hereinafter in this section referred to as the "park"), as generally depicted on a map entitled "Joshua Tree National Park Boundary -- Proposed", dated May 1991, and four maps entitled "Joshua Tree National Park Boundary and Wilderness", numbered in the title one through four, and dated October 1991 or prior, which shall be on file and available for public inspection in the offices of the Superintendent of the park and the Director of the National Park Service, Department of the Interior. The Joshua Tree National Monument is hereby abolished as such, the lands and interests therein are hereby incorporated within and made part of the new Joshua Tree National Park, and any funds available for purposes of the monument shall be available for purposes of the park.

SEC. 403. TRANSFER AND ADMINISTRATION OF LANDS.

Upon enactment of this title, the Secretary shall transfer the lands under the jurisdiction of the Bureau of Land Management epicted on the maps described in section 402 of this title,

without consideration, to the administrative jurisdiction of the National Park Service for administration as part of the National Park System. The boundaries of the park shall be adjusted accordingly. The Secretary shall administer the areas added to the park by this title in accordance with the provisions of law generally applicable to units of the National Park System, including the Act entitled "An Act to establish a National Park Service, and for other purposes", approved August 25, 1916 (39 Stat. 535; 16 U.S.C. 1, 2-4).

SEC. 404. MAPS AND LEGAL DESCRIPTION.

Within six months after the date of enactment of this title, the Secretary shall file maps and legal description of the park with the Committee on Energy and Natural Resources of the United States Senate and the Committee on Natural Resources of the United States House of Representatives. Such maps and legal description shall have the same force and effect as if included in this title, except that the Secretary may correct clerical and typographical errors in such legal description and maps. The maps and legal description shall be on file and available for public inspection in the appropriate offices of the National Park Service, Department of the Interior.

SEC. 405. WITHDRAWAL.

Subject to valid existing rights, all Federal lands within the park are hereby withdrawn from all forms of entry, appropriation, or disposal under the public land laws; from location, entry, and patent under the United States mining laws; and from disposition under all laws pertaining to mineral and ·othermal leasing, and mineral materials, and all amendments

thereto.

SEC. 406. UTILITY RIGHTS-OF-WAY.

Nothing in this title shall have the effect of terminating any validly issued right-of-way or customary operation maintenance, repair, and replacement activities in such right-of-way, issued, granted, or permitted to the Metropolitan Water District pursuant to the Boulder Canyon Project Act (43 U.S.C. 617-619b), which is located on lands included in the Joshua Tree National Park, but outside lands designated as wilderness under section 601(a)(2). Such activities shall be conducted in a manner which will minimize the impact on park resources. Nothing in this title shall have the effect of terminating the fee title to lands or customary operation, maintenance, repair, and replacement activities on or under such lands granted to the Metropolitan Water District pursuant to the Act on June 18, 1932 (47 Stat. 324), which are located on lands included in the Joshua Tree National Park, but outside lands designated as wilderness under section 601(a)(2). Such activities shall be conducted in a manner which will minimize the impact on park resources. The Secretary shall prepare within one hundred and eighty days after the date of enactment of this Act, in consultation with the Metropolitan Water District, plans for emergency access by the Metropolitan Water District to its lands and rights-of-way.

SEC. 407. JOSHUA TREE NATIONAL PARK ADVISORY COMMISSION.

(a) The Secretary shall establish an Advisory Commission of no more than fifteen members, to advise the Secretary concerning the development and implementation of a new or revised

comprehensive management plan for Joshua Tree National Park.

(b)(1) The advisory commission shall include an elected official for each County within which any part of the park is located, a representative of the owners of private properties located within or immediately adjacent to the park, and other members representing persons actively engaged in grazing and range management, mineral exploration and development, and persons with expertise in relevant fields, including geology, biology, ecology, law enforcement, and the protection and management of National Park resources and values.

(2) Vacancies in the advisory commission shall be filled by the Secretary so as to maintain the full diversity of views required to be represented on the advisory commission.

(c) The Federal Advisory Committee Act shall apply to the procedures and activities of the advisory commission.

(d) The advisory commission shall cease to exist ten years after the date of its establishment.

TITLE V - MOJAVE NATIONAL PRESERVE.

SEC. 501. FINDINGS.

The Congress hereby finds that--

(1) Death Valley and Joshua Tree National Parks, as established by this Act, protect unique and superlative desert resources, but do not embrace the particular ecosystems and transitional desert type found in the Mojave Desert area lying between them on public lands now afforded only impermanent administrative designation as a national scenic area;

(2) the Mojave Desert area possesses outstanding

United States Department of the Interior

NATIONAL PARK SERVICE
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, California 92277-3597

IN REPLY REFER TO:
L1429

January 21, 1997

JOSHUA TREE NATIONAL PARK

San Bernardino and Riverside Counties
California

JOSHUA TREE WILDERNESS

As designated by Public Law 103-43
Dated October 31, 1994

National Park Service
Department of the Interior

FINAL
1/19/97

JOSHUA TREE NATIONAL PARK WILDERNESS ADDITIONS
Designated by Public Law (P.L.) 103-433
California Desert Protection Act
October 31, 1994

The following is the legal description of the five areas of wilderness additions within Joshua Tree National Park, designated by Section 601(a)(2) of the Act of October 31, 1994 (P.L. 103-433). Section 602 of the California Desert Protection Act requires that "Maps and a legal description of the boundaries of the areas designated in section 601 of this title shall be on file and available for public inspection in the appropriate offices of the National Park Service..." Note that the legal description of Wilderness Units Nos. 1 to 7 are contained in a National Park Service document dated May, 1978.

Wilderness Unit No. 8 - Pinto Basin Addition
Beginning at the northwest corner of section 19, T. 3S., R. 13E., SBM southerly along the Range line between sections 19 and 24, 25 and 30, 31 and 36, T. 3S., Ranges 12 and 13E., to a point thirty feet north of the intersection of the Range line with the Black Eagle Mine Road;

thence easterly parallel with and 30 feet north of the Black Eagle Mine Road to a point thirty feet west of the intersection of the Black Eagle Mine Road and the Grubstake Canyon Road that leads to the Mystery Mine, which intersection lies in the eastern half of section 33, T. 3S., R13E.;

thence northerly parallel with and 30 feet west of the Grubstake Canyon Road to point of intersection of said road and the section line between section 16 and 21, T. 3S., R. 13E, coincident with the old Joshua Tree National Monument boundary;

thence westerly, along the old Joshua Tree National Monument boundary between sections 16 and 21, 17 and 20, and 18 and 19, T. 3S., R. 13E. to the point of beginning.

Wilderness Unit No. 9 - Eagle Mountains
Beginning at the northwest corner of section 6, T. 4S., R. 13E., southerly along a surveyed line, as depicted on the survey maps 156-41032 (Sheets 2 to 4) of the old Joshua Tree National Monument boundary survey to the southwest corner of section 31, T. 4S., R. 13E., which corner is also common with the old Joshua Tree National Monument boundary as depicted on the 1977 survey maps 156-41032 (Sheet 4);

thence easterly along the Township line between sections 31 and 6, Townships 4 and 5S., R. 13E., to the corner of sections 5 and 6 only, T. 5S., R. 13E.;

thence southerly to the corner of sections 19, 20, 29 and 30, T. 5S., R. 13E. which corner is also common with the old Joshua Tree National Monument boundary as depicted on the 1977 survey maps 156-41032 (Sheet 5)

thence easterly between sections 20 and 29, coinciding with the new Joshua Tree National Park boundary, to the corner of sections 20, 21, 28 and 29, T. 5S., R. 13E.;

thence easterly, departing the new Joshua Tree National Park boundary, between sections 21 and 28, T. 5S., R. 13E., to the section corner between sections 21, 28, 22 and 27, T. 5S., R. 13E.;

thence southeasterly to a point where the northerly boundary of a Metropolitan Water District of Southern California (MWD) right-of-way (ROW) for a power transmission line crosses the section line between 26 and 27, T. 5S., R. 13E., that point being common with the new Joshua Tree National Park boundary;

thence easterly, coinciding with the new Joshua Tree National Park boundary, along the northerly ROW of the MWD power transmission line to the intersection with the section line between sections 29 and 30, T. 5S., R. 14E.;

thence northerly, coinciding with the new Joshua Tree National Park boundary, between sections 29 and 30 to the corner of sections 19, 20, 29 and 30;

thence easterly, coinciding with the new Joshua Tree National Park boundary, between sections 20 and 29, 21 and 28 to a point 500 feet west of where the westerly boundary of the MWD ROW for the West Eagle Mountain Tunnel intersects the section line between sections 21 and 28, T. 5S., R. 14E.;

thence, departing the new Joshua Tree National Park boundary, northeasterly and northerly, parallel with, and 500 feet west of, the westerly edge of the MWD ROW for the West Eagle Mountain Tunnel and then extending to a point of intersection with the section line between section 23 and 26, T. 4S., R. 14E.;

thence westerly on the section line between sections 23 and 26 to the 1/4 section corner between sections 23 and 26;

thence northerly along the N-S centerline of section 23 to the center 1/4 corner of section 23;

thence westerly along the E-W centerline of section 23 to the 1/4 section corner between section 22 and 23;

thence northerly along the section line between sections 22 and 23 to the corner of sections 14, 15, 22 and 23;

thence westerly along the section line between sections 15 and 22 to the corner of sections 15, 16, 21 and 22;

thence northerly along the section line between 15 and 16 to the 1/4 section corner between sections 15 and 16;

thence westerly along the E-W centerline of section 16 to the Center 1/4 section corner of section 16;

thence northerly along the N-S centerline of sections 16 and 9 to the 1/4 section corner between sections 4 and 9, which is a point on the new Joshua Tree National Park boundary;

thence westerly, coinciding with the new Joshua Tree National Park boundary, along the section line between sections 4 and 9, 5 and 8, 6 and 7, T. 4S., R. 14E. and sections 1 and 12, 2 and 11, T. 4S., R. 13E., to the corner of sections 2, 3, 10 and 11, T. 4S., R. 13E.;

thence northwesterly, coinciding with the new Joshua Tree National Park boundary, to the 1/4 corner between sections 3 and 4;

thence northerly, coinciding with the new Joshua Tree National Park boundary, along the section line between sections 3 and 4 to the North 1/16 section corner between section 3 and 4;

thence westerly, leaving the new Joshua Tree National Park boundary, along the E-W centerline of the N1/2 of section 4 to the North 1/16 corner between sections 4 and 5;

thence northerly between sections 4 and 5 to the corner of sections 4 and 5 only, T. 4S., R. 13E.;

thence westerly along the Township line to the point of beginning at the northwest corner of section 6, T. 4S., R13E.

<u>Wilderness Unit No. 10 - South Coxcomb Mountains</u>
Beginning at a point in section 31, T. 3S., R. 16E. at the intersection of the south boundary of the MWD ROW for the Coxcomb Tunnel and the N-S centerline of Government lot 2 of section 31, southerly to the South 1/64-90 corner of section 31, coinciding with the new Joshua Tree National Park boundary;

thence westerly to the South 1/16 corner between sections 31 and 36, T. 3S. Ranges 15 and 16E.;

thence southerly between sections 31 and 36 to the Township corner of section 1, 6, 31 and 36, T. 3S and R. 4S., Ranges 15 and 16E.,

thence westerly along the Township line between sections 1 and 36, Townships 3 and 4S., R. 15E. to the intersection with a point 30 feet easterly of the centerline of a dirt road;

thence southerly, changing to southeasterly parallel with and 30 feet easterly and northeasterly of the centerline of said road to the intersection with the section line between sections 21 and 28, T. 4S. R. 16E.;

thence easterly between sections 21 and 28, 22 and 27 to a point 300 feet westerly of the centerline of State Highway 177;

thence northeasterly parallel with and 300 feet northwesterly of the centerline of Highway 177 to the intersection with the section line between sections 11 and 12;

thence northerly between sections 11 and 12, 1 and 2, and in T. 3S. R. 16 E., sections 35 and 36 to the North 1/16 corner between sections 35 and 36;

thence westerly on the E-W centerline of the NE1/4 of section 35 to the NE 1/16 section corner of section 35;

thence northerly on the N-S centerline of the NE1/4 of section 35 to the East 1/16 corner between sections 26 and 35;

thence westerly between sections 26 and 35 to the W-E 1/64 corner between sections 26 and 35;

thence northerly on the N-S centerline of the SW1/4 of the SE1/4 of section 26 to the SW-SE 1/64 corner of section 26;

thence westerly on the E-W centerline of the SW1/4 of the SE1/4 and the SE1/4 of the SW1/4 of section 26 to the SE-SW1/64 corner of section 26;

thence northerly on the N-S centerline of the SE1/4 of the SW1/4 of section 26 to the C-E-SW 1/64 corner of section 26;

thence westerly on the E-W centerline of the SW1/4 of section 26 to the SW 1/16 corner of section 26;

thence northerly on the N-S centerline of the SW1/4 of section 26 to the C-N-SW 1/64 corner of section 26;

thence westerly on the E-W centerline of the NW1/4 of the SW1/4 of section 26 to the NW-SW 1/64 corner of section 26;

thence northerly on the N-S centerline of the NW1/4 of the SW1/4 of

section 26 to the C-W-W 1/64 corner of section 26;

thence westerly on the E-W centerline of section 26 and section 27 to the Center 1/4 corner of section 27;

thence northerly on the N-S centerline of section 27 to the C-S-N 1/64 corner of section 27;

thence westerly on the E-W centerline of the S1/2 of the NW1/4 of section 27 and on the E-W centerline of the S1/2 of the NE1/4 of section 28 to the SE-NE 1/64 corner of section 28;

thence northerly on the N-S centerline of the E1/2 of the NE1/4 of section 28 to a point of intersection with the southern boundary of a MWD ROW for the Coxcomb Tunnel;

thence southwesterly, leaving the boundary of the new Joshua Tree National Park, and coincident with the southern boundary of the MWD ROW for the Coxcomb Tunnel to the point of beginning.

Wilderness Unit No. 11 - Coxcomb Mountains

Beginning at the corner of sections 9, 10, 15 and 16, T. 1S., R. 13 E., south on the section line between sections 15 and 16, 21 and 22, 27 and 28 to the corner between sections 27, 28, 33 and 34;

thence southeasterly to the corner of sections 34 and 35 in T. 1S., R. 13E.;

thence easterly, coinciding with the old Joshua Tree National Monument boundary as depicted in the 1977 survey maps 156-41035A, between Townships 1S. and 2S., R. 13E., and Townships 1S. and 2S., R. 14E. to the corner of sections 32 and 33, T. 1S., R. 14E.;

thence northerly between sections 32 and 33, T. 1S., R. 14E. to the corner of sections 28, 29, 32 and 33;

thence easterly between sections 28 and 33, 27 and 34, 26 and 35, 25 and 36 in T. 1S., R. 14E., and, in T. 1S., R. 15E., between sections 30 and 31, 29 and 32, 28 and 33, 27 and 34, 26 and 35, to the corner of sections 25, 26, 35 and 36;

thence southerly between sections 35 and 36 to the Township line between Townships 1 and 2S., R. 15E.;

thence westerly on the Township line to the corner of sections 1 and 2 only, T. 2S., R. 15E.;

thence southerly between sections 1 and 2, to the corner of sections 1, 2, 11 and 12, T. 2S., R15E.;

thence easterly between sections 1 and 12, to the corner of sections 1 and 12, on the Range line between T. 2S., and Ranges 15E. and 16E.;

thence southerly, on the Range line between T. 2S., Ranges 15E. and 16E., to the corner of sections 7 and 18, T. 2S., R. 16E.;

thence easterly between sections 7 and 18 to the corner of sections 7, 8, 17 and 18, T. 2S., R. 16E.;

thence southerly between sections 17 and 18, 19 and 20, 29 and 30, 31 and 32, T. 2S., R. 16E., and in T. 3S., R. 16E., sections 5 and 6, and 7 and 8 to the corner of sections 7, 8, 17 and 18, T. 3S., R. 16E.;

thence westerly between sections 7 and 18, T. 3S., R. 16E., and in T. 3S., R. 15E. sections 12 and 13 and 11 and 14, to the corner of sections 10, 11 and 14 and 15, T. 3S., R. 15E.;

thence southeasterly, leaving the old Joshua Tree National Monument boundary, to the section corner of sections 24 and 25, on the Range line between T. 3S., Ranges 15 and 16 E.;

thence southerly on the Range line between T. 3S, Ranges 15 and 16E., to the intersection of the Range line and the northerly boundary of an MWD ROW for a telephone line;

thence northeasterly, coincident with the northerly boundary of an MWD ROW for a telephone line, to the intersection of the northern boundary of the MWD telephone line ROW with the northern boundary of an MWD ROW for a powerline and road;

thence northeasterly, coincident with the northerly boundary of an MWD ROW for a powerline and road to the intersection of the MWD ROW with the section line between sections 9 and 10, T. 3S., R. 16E., which point is also on the boundary of the new Joshua Tree National Park;

thence northerly, coinciding with the new Joshua Tree National Park boundary, between section 9 and 10, 3 and 4 to the 1/4 section corner between sections 3 and 4;

thence easterly on the E-W centerline of section 3 to the C-W 1/16 corner of section 3;

thence northwesterly to the 1/4 section corner between sections 33 and 34, T. 2S., R. 16E.;

thence easterly on the E-W centerline of section 34 to the Center 1/4 of section 34, T. 2 S., R. 16E.;

thence northerly on the N-S centerline of section 34 to the 1/4

section corner between sections 27 and 34;

thence easterly between sections 27 and 34 to the corner of sections 26, 27, 34 and 35;

thence northerly between sections 26 and 27, 22 and 23 to the South 1/16 corner between sections 22 and 23;

thence northerly, leaving the new Joshua Tree National Park boundary, between sections 22 and 23, 14 and 15, and 10 and 11 to a point thirty feet south of the centerline of a dirt road;

thence northwesterly, parallel with and 30 feet southwesterly of, the centerline of said road to a point 300 feet south of the centerline of State Highway 62 in section 20, T. 1S., R. 16E.;

thence northwesterly, coinciding with the new Joshua Tree National Park boundary, parallel with and 300 feet southerly of the centerline of State Highway 62 to the intersection with the N-S section line between sections 15 and 16, T. 1S., R. 15E.;

thence southerly, leaving the Joshua Tree National Park boundary, on the section line between sections 15 and 16 to the corner of sections 15, 16, 21 and 22;

thence westerly between sections 16 and 21 to the corner of sections 16, 17, 20 and 21;

thence northerly between sections 16 and 17, 8 and 9, to a point 300 feet south of the centerline of State Highway 62;

thence, northwesterly changing to southwesterly, coinciding with the new Joshua Tree National Park boundary, parallel with and 300 feet south of the centerline of State Highway 62 for approximately seven miles to a point 30 feet east of the intersection of State Highway 62 and a dirt road in section 8, T 1S., R. 14E.;

thence southeasterly, leaving the new Joshua Tree National Park boundary, parallel with and 30 feet east of the dirt road to the intersection of the dirt road and the section line between sections 16 and 17, T. 1S., R. 14E.;

thence northerly, between sections 16 and 17 to the corner of sections 8, 9, 16 and 17;

thence easterly between sections 9 and 16 to the corner of sections 9, 10, 15 and 16;

thence southerly between sections 15 and 16 to the corner of sections 15, 16, 21 and 22;

thence westerly between sections 16 and 21 to the corner of

sections 16, 17, 20 and 21;

thence northerly between sections 16 and 17 to a point 30 feet south of the intersection of said dirt road;

thence northwesterly, parallel with and 30 feet southwesterly of the dirt road to a point 300 feet south of the intersection of the dirt road and the centerline of State Highway 62;

thence southwesterly, westerly and northwesterly, coinciding with the new Joshua Tree National Park boundary, 300 feet southeasterly, southerly and southwesterly of the centerline of State Highway 62 to the intersection with the section line between sections 11 and 14, T. 1S., R 13 E.;

thence westerly, leaving the new Joshua Tree National Park boundary, between sections 11 and 14, and 10 and 15 to the point of beginning at the corner of sections 9, 10, 15 and 16, T. 1S., R. 13E.

Wilderness Unit No. 12 - Pinto Mountains Addition

Beginning at the southwest corner of section 13, T 2S., R. 9E., northeasterly to the N-N 1/64 corner on the section line of section 13, T. 2S., R. 9E. only;

thence easterly on the east-west centerline of the N1/2 of the N1/2 of section 18, T. 2S., R. 10E. to the N-N 1/64 corner on the section line between sections 17 and 18;

thence northerly on the section line between sections 17 and 18, to the corner of sections 7, 8, 17 and 18;

thence easterly to the corner of sections 8, 9, 16 and 17;

thence easterly between sections 9 and 16 to the 1/4 section corner between sections 9 and 16;

thence southerly on the N-S centerline of section 16 to the Center 1/4 corner of section 16;

thence easterly on the E-W centerline of section 16 to a point 30 feet west of the centerline of a road leading to Gold Park, said point coinciding with new Joshua Tree National Park boundary;

thence continuing easterly, crossing said road, on the E-W centerline of section 16, coinciding with the new park boundary to the C-E 1/16 corner of section 16;

thence southeasterly to the corner of sections 22, 23, 26 and 27 on the old boundary of the Joshua Tree National Monument;

thence westerly, coinciding with the old Joshua Tree National Monument boundary, between sections 22 and 27, 21 and 28, 20 and 29, 19 and 30 to the Range line between T. 2S., Ranges 9 and 10 E.;

thence northerly on the Range line between T. 2S., Ranges 9 and 10 E. to the northeast corner of section 24, T. 2S., R. 9E.;

thence westerly on the section line between sections 13 and 24 to the point of beginning at the southwest corner of section 13.

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08

JOSHUA TREE
DEC 28 1998

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105



Superintendent, Joshua Tree Park
74485 National Park Dr.
Twentynine Palms, CA 92277

Dear Sir:

The Environmental Protection Agency (EPA) has reviewed the Supplement to the Draft Environmental Impact Statement for the **Joshua Tree National Park Backcountry and Wilderness Management Plan** (SDEIS). Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CRF Parts 1500-1508), and Section 309 of the Clean Air Act.

In the SDEIS, the National Park Service (NPS) has identified a fifth alternative, Alternative E, in response to public comment. Alternative E is the NPS's new proposed action. Alternative E has eliminated the distinction between wilderness experience classes A and B. Wilderness use and experience classes will be managed equally throughout the park. Equestrian trails were increased by 3.15 miles. An option exists (at the discretion of the Superintendent) to study the use of llamas in the park. No automobile camping would be allowed at this time on land added to the park in 1994 and a fourth guzzler would be added to the list of artificial water sources to be studied. The overnight group size limit would be 12 in the wilderness subzone and 25 in the backcountry transition subzone. Alternative E does not change the recommendations for Area Closures and the Desert Tortoise found in Alternative A.

The majority of new actions in the SDEIS concern climbing management. Alternative E calls for the establishment of a Climbing Committee, which would function as a subcommittee of the Joshua Tree National Park Advisory Commissions. Some of the proposed actions in the SDEIS include the replacement of existing fixed anchors throughout the park; the use of power drills with a permit; and, the establishment of a cap on the number of new fixed anchor climbing routes per year.

EPA commends NPS for preparing this supplementary NEPA document. The new proposed action, Alternative E, has not altered EPA's original rating of LO (Lack of Objections) for this

1-A

1-A – Thank you for your comments.

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proposed plan. However, as noted in our attached comments, we recommend that additional information be provided in the Final Environmental Impact Statement (FEIS) for clarification purposes

We appreciate the opportunity to review this SDEIS. Please send a copy of the FEIS to this office at the same time it is officially filed with our Washington, D.C., office. If you have any questions, please call me at (415) 744-1584, or have your staff contact Gail Jones at (415) 744-1570.

Sincerely,

David Farrel, Chief
Federal Activities Office

Attachments: 1) Rating Summary
2) Detailed Comments

SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (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 application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (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.

"EO" (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 public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and thos 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 shoul be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably availabl alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce th environmental impacts of the action. The identified additional information, data, analyses, or discussion shoul be included in the final EIS.

"Category 3" (Inadequate)

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

REMARKS

Joshua Tree National Park Backcountry and Wilderness Management Plan SDEIS, EPA Comments, December, 1998

General

In the Introduction to the original DEIS, it is stated that the park consists of more than 794,000 acres. However, on pages 10 & 11 of the SDEIS, only 791,342 acres are accounted for. The acreage allotments should be checked to ensure that all of the park's acreage is included in the FEIS. 1-B

1-B – Comment noted. Corrections have been made. See pages 21-25 plus figure 2 – Joshua Tree National Park Zoning.

Maps

It is recommended that additional maps be provided for clarification purposes. Features that could be shown on these maps include, but are not limited to: topography, rock art and cultural sites, main climbing routes, rivers and streams (if any), built environment (parking lots, buildings, etc.), restricted/closed areas, and any other sensitive environments. If this information is available on existing maps or in other forms, this information should be included or referenced in the FEIS. 1-C

1-C – Comment noted. An additional map of the park's topography has been added as figure 1. Figure 1 identifies topographic features and will help orient readers unfamiliar with the park. Because of their sensitivity, the park does not disclose the locations of rock art and other cultural sites. Main climbing routes are available in various publications that focus on climbing in Joshua Tree National Park. There are no permanent year-round rivers or streams to illustrate. Each developed area has been thoroughly mapped in the park's *General Management Plan.* A notation has been added on page 22 to direct readers to that document. Figure 8 on page 51 identifies sensitive natural or cultural resources that have been designated as day use only areas.

Bicycle Use

The new proposed action calls for 0.67 miles of bicycle trail to be rerouted in the backcountry transition subzone. The rerouted trail has been surveyed for desert tortoise habitat, but the plan fails to provide the results of the survey. The FEIS should discuss whether this new trail traverses desert tortoise habitat and what the impacts are, if any. 1-D

I-D – On August 25, 1998, park staff conducted a field survey for desert tortoise. They located one active burrow about 18 meters from the proposed route. An adult male had been observed earlier in the year. The staff recommended providing for bicycles but not 4-wheel drive motor vehicles. See page 35.

Climbing Management

General: Alternative A stated that "climbing would not be permitted within 50 feet of any prehistoric or historic rock art site or other cultural resource." This protection was not included in Alternative E, the new proposed action. It is unclear if this restriction was lifted after consultation with the climbing community or was inadvertently omitted from the new proposed action. If the omission was intentional, the FEIS should discuss whether restricting climbing to "no closer than 50 feet" would have closed any major climbing routes and if there are adequate safeguards for the rock art and cultural resources without the "no closer than 50 feet" rule. 1-E

I-E – The omission was unintentional. The language has been added on page 45.

New Bolts (Non-Wilderness): The SDEIS states the "if the potential for resource degradation becomes unacceptable, different management actions would be necessary." The FEIS should discuss the criteria for determining when unacceptable degradation is occurring and provide examples of the different management actions that will be implemented. 1-F

I-F – The FEIS is intentionally vague in some cases so that various situations can be addressed on a case-by-case basis with input from the Climbing Committee. Some examples of resource degradation may include social trailing, compacted soils and denuded vegetation at the base of climbs, degradation to scenic values, impacts to microhabitats, etc. A variety of management prescriptions exist; implementation would depend upon the specific situation. Such management actions may include, but not be limited to, relocation of specific bolts, relocation of approach and descent routes, permanent or temporary closures.

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United States Department of the Interior

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

FEB 27 1998

21 A

Superintendent
Joshua Tree Park
74485 National Park Drive
Twentynine Palms, California 92277

Re: Draft General Management Plan Amendment, Supplemental Environmental Impact Statement, Backcountry and Wilderness Management Plan, Joshua Tree National Park, San Bernardino and Riverside Counties, California (1-6-98-TA-81)

Dear Superintendent:

The Fish and Wildlife Service (Service) has reviewed the Draft General Management Plan Amendment and Supplemental Environmental Impact Statement, received November 18, 1997, concerning the Backcountry and Wilderness Management Plan (BWMP) for Joshua Tree National Park (JTNP). The plan addresses the proposed management of both the natural zones in the formerly designated National Monument and the roughly 234,000 acres of lands acquired by the park on October 31, 1994. JTNP is located in Riverside and San Bernardino, counties, California on approximately 794,000 acres of Sonoran and Mojave creosote bush scrub.

As described, the BWMP will designate nearly 270 miles of backcountry/wilderness trails for hiking, biking, and equestrian purposes, along with six unmaintained corridors (55 miles) for primitive (non-motorized) cross-country travel. On the newly annexed lands, vehicle access will be permitted on 36.9 miles of unpaved roads within the backcountry transition subzone. For rock climbing activities, the proposed installation of fixed anchors will be prohibited in the wilderness areas, although new bolted routes could receive written approval following user requests. Automobile camping will be restricted to designated areas and no additional construction of campgrounds will be allowed. Group size limitations will be imposed for overnight ventures into the park's natural zones (25 for the backcountry transition subzone, 12 for experience class A wilderness, and eight for experience class B wilderness). Overnight, seasonal, or permanent use restrictions will be defined for particular cultural sites, wildlife water sources, and sensitive natural areas. The evaluation of water guzzlers will be undertaken to determine the appropriateness of the structures in supporting wildlife and replacing disturbed/destroyed water sources. Additionally, the primary objective of the Desert Tortoise Recovery Plan will be implemented through the designation of a Desert Wildlife Management

COMMENTS

REMARKS

disturbed/destroyed water sources. Additionally, the primary objective of the Desert Tortoise Recovery Plan will be implemented through the designation of a Desert Wildlife Management Area (DWMA) in JTNP (natural subzones only).

Under current management practices, no officially approved bike or equestrian routes exist within the boundaries of the park. As stated, the proposed BWMP will designate a limited number of trails to facilitate improved maintenance/oversight, curtail the proliferation of social walkways/pathways (largely caused by hikers and equestrians), and prevent unnecessary vegetation degradation. However, the planned establishment of approximately 22 miles of combined bike and horse trails, and over 200 miles of other single use recreational routes, will occur in habitat occupied by the federally threatened desert tortoise (*Gopherus agassizii*). The compatibility of the proposed activities and the known presence of the listed species was not addressed within the BWMP. In the Desert Tortoise Recovery Plan, research on the effects of non-vehicular oriented recreation on the desert tortoise and the species' associated habitat was a specific recommendation drafted for the JTNP area. 2-A 2-B

Similarly, eight different roadways in the southern and eastern regions of the park will be authorized for vehicle access. All the trails are confined to the lands obtained through legislation in 1994. Six of the proposed roads traverse designated critical habitat for the desert tortoise. No indication of tortoise density or numbers within the proposed project area was included in the BWMP. At a minimum, a monitoring program should be designed to assess the potential for vehicle-related tortoise mortality both prior and subsequent to the opening of the roads. Additionally, protective measures to reduce the likelihood of desert tortoise take and prevent unnecessary disturbance to critical habitat warrants consideration. 2-C

The existing artificial water sources (i.e., guzzlers) located in JTNP will be subject to a three year research effort to ascertain the suitability of the structures within wilderness area. The BWMP states that functioning guzzlers, which provide benefits to the local bighorn sheep populations or augment artificially depleted water supplies, will remain *in situ*. Otherwise, the functioning guzzlers will be disassembled and removed from the habitat. The issue of a constructed water source that supports the targeted wildlife, but proves detrimental to other species was not analyzed within the context of the management plan. Incidents of tortoise mortality in upland game guzzlers has been previously recorded. Also, the overall issue of adequate justification for artificial water sources in designated wilderness zones requires further examination. 2-D 2-E 2-F

Species of special concern outlined in the BWMP, as potentially occurring in JTNP, were limited to federally endangered, threatened and candidate flora/fauna. Three species which satisfied the criteria, but were not included on the list were: the endangered least Bell's vireo (*Vireo bellii pusillus*), threatened Parish's daisy (*Erigeron parishii*), and proposed endangered Coachella Valley milk-vetch (*Astragalus lentiginosus* var. *coachellae*). Other sensitive species meriting conservation/management efforts, due to the possibility of direct/indirect impacts from project activities, are: the greater western mastiff-bat (*Eumops perotis californicus*), 2-G

2-A - The first sentence is not completely accurate. Currently, equestrians must stay on established trails, such as the California Riding and Hiking Trail and the Boy Scout Trail, or must use active washes. Thus, the plan increases the number of miles of trail, but, in reality, restricts equestrians to designated trails rather than all trails plus active washes.

2-B - Prior to any equestrian or bicycle trail construction, the affected area will be examined for the presence of desert tortoise. If warranted, further consultation with U.S. Fish and Wildlife Service will occur 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 any tortoise mortality. In addition, the National Park Service will continue to use park media – brochures, newspaper, etc., - to inform park visitors about the tortoise.

2-C - Figure 10 on page 55 has been added to the FEIS; it depicts both critical habitat and tortoise locations. To establish baseline data, the National Park Service will continue to survey areas of tortoise habitat and will continue to monitor road mortality, especially in areas of high density. In addition, the National Park Service will continue to use park media – brochures, newspaper, etc., - to inform park visitors about the tortoise. If warranted, additional mitigation measures will be implemented.

2-D - The final EIS has been changed. National Park Service biologists, in consultation with other federal and state agencies, will determine the length of the study. See page 50.

2-E - The issue of a constructed water source that supports targeted wildlife but proves to be detrimental to other species will be thoroughly analyzed in the study.

2-F - The overall issue of adequate justification for the artificial water sources in designated wilderness will be thoroughly examined in the study.

2-G - The park ecologist and botanist have reviewed the list provided and identified those species that occur in the park. The identified species have been added as noted. See pages 88 and 89.

1 80

Superintendent (1-6-98-TA-81) 3

California leaf-nosed bat (*Macrotus californicus*), San Diego horned lizard (*Phrynosoma coronatum blainvillii*), small-flowered androstephium (*Androstephium breviflorum*), pinyon rock cress (*Arabis dispar*), alkali mariposa lily (*Calochortus striatus*), crucifixion thorn (*Castela emoryi*), Payson's jewelflower (*Caulanthus simulans*), flat seeded spurge (*Chamaesyce platysperma*), California ditaxis (*Ditaxis californica*), glandular ditaxis (*Ditaxis clariana*), foxtail cactus (*Escobaria vivipara* var. *alversonii*), little San Bernardino Mountains gilia (*Gilia maculata*), spearleaf (*Matelea parvifolia*), Robison's monardella (*Monardella robisonii*), lobed ground-cherry (*Physalis lobata*), Orocopia sage (*Salvia greatae*), salt spring checkerbloom (*Sidalcea neomexicana*), Laguna Mountains jewelflower (*Streptanthus bernardinus*), mesquite nest straw (*Stylocline sonorensis*), and Mecca-aster (*Xylorhiza cognata*).

The Service recommends that appropriate avoidance, minimization, and mitigation measures be outlined for all the listed/sensitive species which may be affected by the implementation of any component of the BWMP. Focused surveys, using Service-approved protocol, should be conducted within the action area for the desert tortoise and other locally known/potential species of special concern. Additionally, the Service would suggest that JTNP initiate informal/formal consultation to jointly address the issue of management planning and discuss the adoption of the primary recommendation in the Desert Tortoise Recovery Plan (i.e., the designation of the Joshua Tree DWMA). Concerted coordination between the agencies will assist in ensuring the greatest benefits to natural resources and the ecosystem, as a whole. 2-H 2-I

The Service appreciates the opportunity to comment on the BWMP. Questions or concerns pertaining to this correspondence can be directed to Debbie MacAller of my staff at (760) 431-9440.

Sincerely,

Sheryl L. Barrett

Sheryl L. Barrett
Assistant Field Supervisor

2-H - Surveys, using Service-approved protocol, will be conducted for desert tortoise and other species of concern. In addition, the National Park Service will prepare additional NEPA compliance documentation for future construction projects as they are designed and funded. At that time, the National Park Service will have adequate details for the proposal and any impacts they may have. Surveys will be completed for tortoise and any other species of concern that may be affected by a project and additional consultation with U.S. Fish and Wildlife Service will occur.

2-I - The *Backcountry and Wilderness Management Plan* implements the *Desert Tortoise Recovery Plan* by immediately designating all of the natural zone of Joshua Tree National Park as a desert wildlife management area (DWMA) and adapting the management recommendations for DWMAs in the recovery plan. See page 53.

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MORONGO BAND OF MISSION INDIANS

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November 17, 1997

Ernest Quintana, Superintendent
National Park Service
Joshua Tree National Park
74485 National Park Drive
Twenty-Nine Palms, CA 92277-3597

Re: Comments on the draft EIS, Backcountry and Wilderness Plan.

Dear Mr. Quintana:

The Morongo Band has had an opportunity to review the draft document. Based upon the review, we feel that overall the document is a good one. However, we offer the following comments:

On page 68 of the document Ethnography, the document talks about requests from Tribal members to collect plants for medicine and religious purposes, as well as conduct certain ceremonies and review the parks collections of various artifacts and sites. The Band and its members have had the opportunity and wants to continue it. The document should be modified to relate that it is an approved practice for members to conduct the above items. Please change the document so that this can occur. 3-A

We look forward to your positive response on this matter.

Should you have any questions, please feel free to at the above telephone number.

Sincerely,

James J. Fletcher
Environmental Officer

cc: Morongo Tribal Council
File

3-A - The text in the Ethnography section of the Affected Environment chapter (page 95) has been changed, as follows, to reflect the American Indian Religious Freedom Act (42 USC 1996), which was enacted after this section of the document was written.

The American Indian Religious Freedom Act (42 USC 1996) states that *"henceforth it shall be the policy of the United States to protect and preserve for American Indians their inherent right to freedom to believe, express, and exercise the traditional religions of the American Indians, Eskimos, Aleut, and Native Hawaiians, including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites."* This statute does not create additional rights or change existing authorities. As a matter of policy in keeping with the spirit of the law, however, the National Park Service will be as unrestrictive as possible in permitting Native American access to and use of traditional sacred resources for customary ceremonials, provided that such use does not cause permanent damage to the integrity of the resources.

Although the act and new policy broadens restrictions on gathering natural materials through more generic language, tribes must still receive prior written approval from the Superintendent to ensure that there is no permanent damage to the integrity of park resources. The National Park Service will work with tribes to establish a process to gather renewable materials for traditional ceremonial and religious purposes and to ensure no derogation to park resources. Tribal members will continue to have access to view the park's collection of artifacts and sites.

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State of California - The Resources Agency
DEPARTMENT OF FISH AND GAME
http://www.dfg ca.gov
Eastern Sierra-Inland Deserts Region
330 Golden Shore, Suite 50
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(562) 590-5113

PETE WILSON, Governor

JOSHUA TREE
28 1998
NATIONAL PARK

December 24, 1998

Mr. Ernest Quintana, Superintendent
Joshua Tree National Park
74485 National Park Drive
29 Palms, California 92277

Dear Mr. Quintana:

Supplement to the Draft General Management Plan Amendment,
Supplemental Environment Impact Statement,
Backcountry and Wilderness Management Plan for Joshua Tree National Park,
Riverside and San Bernardino Counties, California

The Department of Fish and Game (Department) has reviewed the above-referenced document. The original document contained eight significant actions each with four alternatives. The Supplement to the draft offers a fifth alternative, which constitutes the Park Service's new proposed action for the management of the backcountry and wilderness areas of Joshua Tree National Park. The Department provides the following general and specific comments for incorporation into the final combined Environmental Impact Statement.

As principal trustee for the fish, wildlife, and native plants of the State of California (Fish and Game Code § 1802), the Department specifically wishes to comment on Action No. 5, "Analysis of major artificial water sources installed for wildlife, in designated wilderness, and whether such sources should be removed or maintained", as it pertains to desert bighorn sheep, *Ovis canadensis nelsoni*, a taxon that is legislatively defined as a fully protected State species. Fish and Game Code § 4700 and 4902 define "fully protected" species and associated management policies

The Department finds the "New Proposed Action", Alternative 5, to be the most appropriate so long as the following provisions are included in the in-depth analysis of the artificial water sources:

- The study design will be a cooperative effort between Department wildlife biologists and Park Service biologists, and will be acceptable to both Agencies. 4-A

Conserving California's Wildlife Since 1870

4-A - While we will strive to reach a study design acceptable to all agencies, the ultimate decision rests with the National Park Service.

The study duration must include a 10 year-period with at least 3 years of consecutive drought conditions to accurately represent wet and dry cycles common to the desert ecosystem. 4-B

Maintenance will continue to be performed on all of the artificial water sources to be evaluated to ensure they remain functional over the full term of the study. 4-C

Until such time as the study is completed, all data analyzed, and a scientifically based decision unanimously reached by both Agencies on said data, the water sources will remain in place. 4-D

In addition, the Department strongly suggests that the Park Service review our initial comments letter, dated February 17, 1998. These comments were provided on the "Draft General Management Plan Amendment" and addressed our concerns involving possible implementation of the proposed actions, along with the potential impacts to the metapopulation dynamics of the South Mojave Metapopulation of which Joshua Tree National Park is but a small part.

The "New Proposed Action", discussed above, has a large "sphere of influence" with potential impacts to mountain sheep populations that extend far beyond the boundaries of the Park, as well as the potential to adversely impact many species, both resident and migratory, that rely on these drinkers for their existence.

Of the five alternatives now proposed, the Department will support the "New Proposed Action", the newest alternative, so long as our concerns are addressed and fully disclosed to the public during the review process.

The Department requests a copy of your response to our comments and a copy of any revisions proposed for this document.

If you have questions, please contact Mr. Gerald P. Mulcahy, Associate Wildlife Biologist, at (760) 922-5613. Thank you for the opportunity to respond to this document.

Sincerely.

Curt Taucher

Curt Taucher
Regional Manager

cc: See attached list

4-B - The length of the study will be determined by National Park Service biologists in consultation with other Federal and state agencies.

4-C - The artificial water sources may continue to be maintained through the course of the study. See page 50.

4-D - The artificial water sources may remain in place until the completion of the study. See page 50.

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State of California - The Resources Agency
DEPARTMENT OF FISH AND GAME
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330 Golden Shore, Suite 50
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PETE WILSON, Governor

1998

February 17, 1998

Mr. Ernest Quintana
Superintendent, Joshua Tree National Park
74485 National Park Drive
29 Palms, California 92277

Dear Mr. Quintana:

Re: Draft General Management Plan Amendment Supplemental Environmental Impact Statement, Backcountry and Wilderness Management Plan for Joshua Tree National Park, Riverside and San Bernardino Counties, California

Dear Mr. Quintana:

The Department of Fish and Game (Department) has reviewed the above referenced document. The plan Amendment offers 8 significant actions, each with 4 alternatives, for management of the backcountry and wilderness areas of Joshua Tree National Park. The Department provides the following general and specific comments for incorporation into the final EIS.

As principal trustee for the fish, wildlife, and native plants of the state of California (Section 1802, California Fish and Game Code), the Department specifically wishes to comment on Action #5, "Analysis of major artificial water sources installed for wildlife, in designated wilderness, and whether such sources should be removed or maintained", as it pertains to desert bighorn sheep, Ovis canadensis nelsoni, a taxon that is legislatively defined as a fully protected state species. Sections 4700 and 4902 of the Fish and Game Code defines "Fully Protected" species and associated management policies.

The Department finds the "Minimum Requirements" alternative to be the most appropriate since it allows for the maintenance of all existing artificial water sources, and for the possibility of installing new ones. The "No Action", and "Maximum Protection" alternatives are not acceptable. However, since the Park Service prefers to

adopt the "Proposed Action" alternative, the Department will comment specifically on said action. The Department feels that this action needs to be rewritten to include the following provisions before it is acceptable to the Department.

The study design will be a cooperative effort between Department Wildlife Biologists and Park Service Biologists, and will be acceptable to both Agencies.	5-A	5-A - See 4-A.
The study duration will be over a 10 year period that would include at least 3 years of drought conditions to be truly representative of the wet and dry cycles common to the desert ecosystem.	5-B	5-B - See 4-B.
Maintenance will continue to be performed on all of the artificial water sources to be evaluated to insure they remain functional over the full term of the study.	5-C	5-C - See 4-C.
Until such time that the study is completed, all data analyzed, and a scientifically based decision unanimously reached by both Agencies on said data, the water sources will remain in place.	5-D	5-D - See 4-D.
In addition, the Department suggests that a review of the publications, "Studies Of Bighorn Sheep In Joshua Tree National Monument" (Douglas, 1976), and "Mechanical Evaluation Of Artificial Watering Devices Built For Mountain Sheep in California" (Bleich and Pauli, 1990) is in order for this action.	5-E	5-E - Such a review would occur in conjunction with the above-mentioned study.
Most importantly, the Department is very concerned that any actions taken within the boundaries of Joshua Tree National Park will adversely impact desert bighorn sheep outside the Park. Any actions that might prove adverse if implemented prematurely can have a profound detrimental effect on the regional metapopulation dynamics of the South Mojave Metapopulation, of which Joshua Tree National Park is but a small part (Torres et al., 1993). At this time the sphere and influence of sheep populations within Park boundaries as they pertain to metapopulation dynamics is not fully known. Nevertheless, substantial evidence (Schwartz et al., 1986; Bleich et al., 1990, 1996) supports the concept of a metapopulation structure among desert sheep populations in the geographic area. Thus, the Department recommends that Joshua Tree National Park wait until such time as the Metapopulation Plans for desert bighorn sheep are incorporated into the Final West Mojave, and Northern and Eastern Colorado Deserts Management Plans before implementing any actions that may impact desert bighorn sheep. These Metapopulation Plans are currently being written by the Department.	5-F	5-F - This information will be taken into consideration by the scientists when determining the length and scope of the study design.

COMMENTS

The two statements on page 43, "Habitat Manipulation", paragraph 3 are erroneous and misleading. Bees, that in the past have drowned in drinkers, are non-native feral honeybees. The Department has solved this problem by installing floating devices in larger drinkers, and by placing protruding rocks in smaller drinkers. This allows bees to crawl out, dry, and fly away, and has eliminated the drowning problem.

5-G

The second statement involving the system referenced is misleading. This catchment is a typical big game guzzler, and inspection and maintenance visits are performed bi-annually, or as additional needs dictate, by Department-affiliated persons. This system is also inspected during capture operations and the annual helicopter census, because it is so difficult to get to. Old Dad Peak is within the newly created Mojave National Preserve, and the Department's June, 1995 survey and capture flight was delayed until the fall, because of a requirement for NEPA compliance and public review of our capture plan. Had we been able to carry out the helicopter work as scheduled, the potential for the disease outbreak might have been detected and nullified. The document should also clearly state that the cause of the die-off was botulism poisoning; the die-off was not related to a "system failure", as currently stated.

5-H

The "Proposed Action" discussed above has a large "sphere of influence" with potential impacts to mountain sheep populations that extend far beyond the boundaries of the Park, as well as the potential to adversely impact many species that rely on these drinkers for their existence. Because of the inadequacies and inaccuracies in the Draft EIS, the Department can support the "Proposed Action Alternative" only if the above input is incorporated into the document.

The Department requests a copy of your response to our comments and a copy of the revised Draft EIS. If you have any questions, please contact Mr. Gerald P. Mulcahy, Associate Wildlife Biologist, at (760) 922-5613. Thank you for the opportunity to respond to this document.

Sincerely,

Curt Taucher
Regional Manager

Attachment

*Bibliography

REMARKS

5-G - The statement has been removed.

5-H - This reference has also been removed.

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COMMENTS

REMARKS

IMPERIAL COUNTY FISH & GAME COMMISSION

LARRY CAFFEY, Chm. · CAROLYN HINDLE Vice Chm. · HANK BENTON · DENNY BRADSHAW · DAVID CROCKETT · MARK HUBER · SAMUAL KAKER · ALAN KELTZ · STEPHEN REBIK · JOHN WHITLOCK

1008 State St. El Centro, CA 92243 TEL: (760) 336-4364 FAX: (760) 336-4372

Superintendent Ernest Quintana
Joshua Tree National Park
74485 National Park Drive
Twenty-nine Palms, California 92277

February 27,1998

Re: JTNP Backcounty & Wilderness Mgt. Plan

Dear Mr. Quintana,

The Imperial County Fish & Game Commission (ICFGC) would like to thank you for the opportunity to review & comment on the JTNP Draft Plan. As acknowledged by the plan ".....past monitoring indicates that discharge at some springs is decreasing and compared to historic account, surface water has decreased significantly from 50 years ago." This statement could be repeated concerning wildlife water availability throughout the Southern California Desert areas The cumulative effect of over pumping wells, water diversions, human development & natural drought conditions have placed an even greater importance on those few remaining water sources both natural & artificial in sustaining isolated & dwindling wildlife populations. As you may be aware County Fish & Game Commissioners from San Bernardino, Riverside & Imperial Countys have been working with volunteer organizations such as FNAWS, SCBS, DWU, SCI, etc., to develop and maintain scores of natural & man-made water sources to sustain and in some cases even increase numerous wildlife species back from the edge of extinction. Any further reduction of critical available water sources only further impacts the ability of species to survive in our harsh and shrinking native habitats. For these reasons, ICFGC strongly recommends you reconsider your "test & removal" of any historic available wildlife water guzzlers Water in the desert is probably the one most limiting factor in survival of many mammals, birds, bats and even some insects, whether game or non-game, common or T. & E. Species.

Furthermore, ICFGC recommends that you give consideration to working with one or more of these organizations to facilitate improvements and/or replacements of these vital water sources with new proven designs which are more efficient, require less or no maintenance, and are visibly compatible with established wilderness values. Desert Wildlife Unlimited (DWU) has developed such a water source and has in fact installed such a device concealed with artificial rock/concrete encasements in JTNP, Little Fargo Canyon area with SCBS, BLM, FNAWS & CDFG (see photo & article attached -1993) Leon Lesicka DWU (760)344-7073 or Dick Conti, SCBS (213)256-0463 are experts in water source enhancement and development projects in California, Arizona, Nevada, Utah, Mexico, and even Mongolia, and will be happy to assist you.

Please - don't cause the destruction of any more wildlife populations by eliminating their vital water sources. We all need to work together to provide for the needs of our remaining species in the very harsh & limited habitat areas remaining.

Thank you for your consideration in this matter.

Respectfully,

RANDY RISTER, Secretary
IMPERIAL COUNTY FISH & GAME COMMISSION

cc Duncan Hunter, Congress (R-52)
Leon Lesicka, DWU
Dick Conti - SCBC
Nancy Andrew - CDFG

fg/jtnp-mgt.pln

AN EQUAL OPPORTUNITY AFFIRMATIVE ACTION EMPLOYER

6-A

6-A - The maintenance of wild and self-sustaining populations of native animal and plants is part of the National Park Service mission, both under the Organic Act and the Wilderness Act. Section 4(c) of the Wilderness Act, however, prohibits, among other things, the placement of structures or installations in wilderness. The Wilderness Act allows an exception to section 4(c) "as necessary to meet the minimum requirements for the administration of the area for the purpose of the Wilderness Act."

National Park Service policy directs that natural processes be relied upon to control populations of native species to the greatest extent possible. The National Park Service may allow the continued existence of currently functioning artificial water sources if such a source is documented as necessary to help a species of concern from declining below a stable population. The National Park Service may also allow such water sources if they simulate a natural feature or process that has been altered or destroyed by human activities.

Thus, the National Park Service is required by law and its own policy to thoroughly evaluate the appropriateness of these artificial water sources. This plan calls for the National Park Service, in consultation with other state and Federal agencies, to conduct a scientific study of these artificial water sources.

COMMENTS

Nancy Rister
1002 W State St
El Centro CA 92243-2831

REMARKS

DESERT TORTOISE COUNCIL
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DESERT TORTOISE PRESERVE COMMITTEE, INC.
4067 Mission Inn Avenue, Riverside, California 92501

CALIFORNIA TURTLE AND TORTOISE CLUB, Executive Board
P.O. Box 7300, Van Nuys, California 91409-7300

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December 18, 1998

Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Dear Superintendent Quintana:

The Desert Tortoise Council, the Desert Tortoise Preserve Committee, Inc. and the California Turtle and Tortoise Club, Inc. offer the following comments on the Supplemental Environmental Impact Statement (EIS) and General Management Plan for Joshua Tree National Park.

GENERAL COMMENTS

The three groups that jointly sign this letter are the foremost public citizen organizations concerned with the protection and recovery of the desert tortoise *(Gopherus agassizii)*. On April 2, 1990, the United States Fish and Wildlife Service listed the Mojave population of the desert tortoise to be "threatened." Critical habitat for the Mojave population was designated on February 8, 1994. Part of two units of designated critical habitat, the Chuckwalla and the Pinto Mountain units, lie within what is now Joshua Tree National Park.

Virtually all of the lands within the former Joshua Tree National Monument portion of Joshua Tree National Park, though not legally critical habitat, are nonetheless biologically critical. The February 8, 1994 notice in the *Federal Register* (59 FR 5825) that designated critical habitat stated the following about Joshua Tree:

> The current management policies of... Joshua Tree National Monument...provide adequate protection against potential habitat-altering activities because (it is) primarily managed as natural ecosystem(s).

The Notice continued

> These lands are essential to the conservation of the species because they provide important links and contain large areas of contiguous habitat...

Much of Joshua Tree is not designated critical habitat, not because the habitat was not biologically critical for desert tortoise but because the Fish and Wildlife Service believed that designation would add only superfluous protection to habitat that should already be protected by the National Park Service (NPS). We hold the NPS to that high standard and we comment upon the NPS Supplemental

EIS in that vein.

In general, we strongly endorse the NPS plan in Alternative A and E to designate virtually all of Joshua Tree National Park as a Desert Wildlife Management Area (DWMA). The NPS proposal would constitute the first DWMA implemented under the June 1994 Tortoise Recovery Plan. We commend the NPS for showing the way. We applaud the closure of certain dirt roads within the Chuckwalla unit of critical habitat.

We do not support the "open" designation of other roads that should be closed and the possible designation of a primitive campground for vehicles in critical habitat. We challenge the conduct of organized motor vehicle events on dirt roads in critical habitat. We also question whether this proposed plan fully implements all of the recommended actions of the Recovery Plan. Please consider our comments on each issue.

A. DWMA DESIGNATION

Our organizations strongly support the designation of a Joshua Tree DWMA as prescribed in the *Desert Tortoise (Mojave Population) Recovery Plan* of June 1994 (page F37-39). This decision is the first among the Federal land management agencies in southern California to fulfill a key provision of the *Recovery Plan*. In so doing, Joshua Tree National Park staff demonstrates a fundamental grasp of the Endangered Species Act (16 U.S.C. 1531 *et seq.*) and recovery planning. 7-A

The goal of the Endangered Species Act is to recover listed species. It is insufficient for a Federal agency to simply refrain from, or prevent, take of the species. Nor does a Federal agency fulfill its responsibility under the law simply by consulting with the Fish and Wildlife Service. Section 7(a) of the Act requires that all "Federal agencies shall utilize their authorities in furtherance of the purposes of this Act by carrying out programs for the conservation of...threatened species."

The Joshua Tree DWMA meets the criteria specified for DWMAs in the Recovery Plan and we urge that the Final Joshua Tree GMP proceed with the DWMA designation.

B. ROAD CLOSURES AND SPEED LIMITS

Alternative E in the Supplemental Environmental Impact Statement proposes to close to motor vehicles approximately 9.4 miles of road in the Fargo-Rockhouse Canyon area. These roads traverse the Chuckwalla designated critical habitat in the park and we fully support this closure. We also endorse the establishment of a 25-mile per hour speed limit on all dirt roads in the park. 7-B

C. ROADS DESIGNATED AS OPEN

Alternative A proposed that the NPS designate 36.9 miles of dirt roads as open to motor vehicles. Alternative E adds 0.8 miles for a total of 37.7 miles of open road. We are dismayed that 33 miles of the proposed open roads (the 4.7 miles of the Powerline Road is the exception) lie within the Chuckwalla critical habitat unit.

Two areas, in particular, are of grave concern to us. First, is the 6 miles of the Thermal Canyon road and a connecting link between that road and the Pinkham Canyon road. These are not roads at all. They are dirt tracks that have been imprinted by the passage of vehicles. The Thermal Canyon 7-C

7-A - Comment noted. The designation of the natural zone of Joshua Tree National Park as a desert management wildlife area will continue with the approval of the *Backcountry and Wilderness Management Plan.*

7-B - Comment noted.

7-C - Part of the recreational experience provided in Joshua Tree National Park is the ability to access remote areas of the park via 4-wheel drive vehicles. The Thermal Canyon Road and the connector to Pinkham Canyon traverse gorges that are deeply incised into the Little San Bernardino Mountains. The terrain is rugged and dry and has a quiet and austere beauty. Although the speed limit on dirt roads is 25 miles per hour, the road's character and condition further limits it to slower speeds. These roads already exist and make logical connections with other existing roads. Road mortality will continue to be monitored, and additional mitigation measures will be implemented if warranted. In addition, increased education about desert tortoise in exhibits and literature will help mitigate any potential impacts to the tortoise.

"road" follows a wide desert wash for most of its length before climbing into more hilly terrain. Desert washes are especially critical to the integrity of desert ecosystems. The connecting link then traverses to the east across rugged terrain where the road is barely discernible.

Second, we question the Black Eagle Mine and the Grubstake Canyon road. The 6.5 miles of these roads also lie in the Chuckwalla critical habitat unit. Moreover these roads go nowhere. They dead-end. Black Eagle Mine road ends at the locked gate that gives access to the Eagle Mountain Mine. The Grubstake Canyon road ends at the former monument boundary, which is wilderness. Perhaps persons with any proven valid existing mining claims along these roads may be permitted to use such roads for access. However, these roads have little or no recreational value. 7-D

The Black Eagle Mine road and the Grubstake Canyon road further impact critical tortoise habitat already threatened by the world's largest landfill proposed at the Eagle Mountain mine. We would be remiss in opposing that dump and remaining silent on these roads. The NPS would be hypocritical to criticize impacts emanating from the proposed nearby landfill while designating roads to be open to motor vehicles in the very same location.

We urge that the NPS not designate as open the Thermal Canyon road, the connecting link between that road and the Pinkham Canyon road, the Black Eagle Mine road extension and the Grubstake Canyon road. Thus, the NPS would close an additional 12.5 miles of road and keep open 25.2 miles. This is a reasonable balance that affords public access while minimizing impact to critical habitat.

7-D - Part of the recreational experience provided in Joshua Tree National Park is the ability to access remote areas of the park via 4-wheel drive vehicles. The Black Eagle Mine Road and the Grubstake Canyon Road provide access to an extremely remote part of the park. This part of the park provides outstanding the scenic opportunity of viewing the immense expanse of the Pinto Basin with the Hexie, Pinto, and Eagle Mountains providing a panoramic background. Although the speed limit on dirt roads is 25 miles per hour, the road's character and condition further limits it to slower speeds. These roads already exist. Road mortality will continue to be monitored, and additional mitigation measures will be implemented if warranted. In addition, increased education about desert tortoise in exhibits and literature will help mitigate any potential impacts to the tortoise.

D. PRIMITIVE CAMPSITE

Alternative E also contains a proposal absent from Alternative A. Alternative A was the original NPS Proposed Action Alternative. Alternative E, page 32, adds that the "NPS has the option to initiate a study for future consideration of an additional 4-wheel drive/primitive campsite in the Little San Bernardino Mountains." Virtually all of the Little San Bernardino Mountains addition to Joshua Tree National Park lies in the Chuckwalla critical habitat unit.

The Supplement does not propose that the NPS establish a campsite in the Little San Bernardino Mountains. However, should the NPS initiate a study to do so, we expect that the NPS will notify all three of our organizations immediately. We remind the NPS that its Supplemental EIS provides insufficient detail on this proposal to support an opinion from the U.S. Fish and Wildlife Service. Therefore, before designating a campground, the NPS would need to conduct a section 7 consultation with the U.S. Fish and Wildlife Service in Carlsbad, California. 7-E

7-E - Any action to designate a campsite in the Little San Bernardino Mountains would require the preparation of environmental analysis documentation, probably in the form of an Environmental Assessment (EA). Consultation with the U.S. Fish and Wildlife Service would occur during the development of the environmental analysis. An EA would provide the public with the opportunity to review and comment upon the proposed action.

E. ORGANIZED MOTOR VEHICLE EVENTS

We support the NPS Proposed Action Alternative in A and E to not allow competitive organized motor vehicle events in the park. Such events would not be consistent with recommended actions in DWMAs on page 56 of the Recovery Plan. Nor would such events be consistent with the types of park enjoyment that the NPS permits under the Organic Act of the NPS (16 U.S.C. 1, *et seq.*).

We question whether the NPS should allow even large-scale non-competitive motor vehicle events on any of the dirt roads of the park. We suggest that the NPS consider reducing the size of such events to no more than 25 vehicles and confine them to paved roads only. 7-F

7-F - The National Park Service would review any request for non-competitive motor vehicle events on a case-by-case basis. If the situation warranted, the National Park Service has the option of establishing a lower maximum number of participants. In addition, the National Park Service retains the option of limiting travel to specific roads in the park.

E. UNFULFILLED RECOVERY PLAN ACTIONS

COMMENTS

The NPS Supplement needs to review the Recovery Plan once again for recommended actions specific to the Joshua Tree DWMA. The actions are on F38 of the Recovery Plan. They include:

> Establishing a portion of the visitor center for the purpose of educating visitors on the status and plight of the desert tortoise and to serve as a drop-off site for unwanted captive tortoises.
> Providing a drop-off site may lessen the chance that well-meaning persons may release captive but unwanted tortoises into the native wild population of tortoise in the park.
> Constructing tortoise fencing along roads, in particular, the road from Cottonwood Pass north through the park.

We acknowledge that the *Recovery Plan* states that "If fencing is not permitted within the Monument, expand the boundary of the DWMA to the boundary of the Monument." The NPS' proposed DWMA boundary extends to the boundary of the National Park. Thus fences may not be necessary to fulfill the letter of the *Recovery Plan*. We recommend that the NPS determine if there are stretches of road where tortoise mortality occurs, and then selectively fence such stretches. 7-G

SUMMARY

Generally, we find the Joshua Tree GMP Amendment and the its Supplemental EIS to be protective of tortoises and other natural values and we urge its adoption with the improvements we have recommended.

Sincerely,

Katherine Zander, Senior Co-Chair, Desert Tortoise Council

Jim Anderson, Executive Director, Desert Tortoise Preserve Committee, Inc.

Marc Graff, M.D., Chair, Executive Board, California Turtle and Tortoise Club

cc: Mr. Ken Berg, U.S. Fish and Wildlife Service, 2730 Loker Ave W., Carlsbad, CA 92008
Mr. David Harlow, U.S. Fish and Wildlife Service, 3310 El Camino Ave, Suite 130, Sacramento, CA 95821
Director, National Park Service, 1849 C Street, N.W., Washington, D.C. 20240

REMARKS

7-G - The National Park Service will continue to monitor road mortality, especially in areas of high density. If warranted, additional mitigation measures may be implemented.

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Postmarked 1/20

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the ACCESS FUND
preserving America's diverse climbing resources

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19 January 1999

Ernest Quintana
Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

JAN 25 199

RE: SUPPLEMENT TO THE DRAFT BACKCOUNTRY AND WILDERNESS MANAGEMENT PLAN & ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Quintana,

The Access Fund appreciates the opportunity to comment again on the Draft Backcountry & Wilderness Management Plan (BWMP) for Joshua Tree National Park. As you know, the Access Fund is America's largest national climbers organization, with some 9000 members nationwide (about 1800 of whom live in California). Our mission is to keep climbing areas open and to conserve the climbing environment.

We herein incorporate by reference the comments submitted in our previous letter of February 26, 1998, particularly those pertaining to the "Joint Proposal" presented by the Access Fund, the National Parks & Conservation Association, The Wilderness Society, and Friends of Joshua Tree as an alternative for climbing management policy.

The Access Fund applauds Joshua Tree for going to substantial lengths to solicit and respond to public comments on the BWMP. In general, we believe the changes reflected in the New Proposed Action are appropriate. We therefore support Alternative E subject to the following comments.

Climbing Policy

The Access Fund appreciates the efforts of the Park Service to consider and utilize feedback from the interested public in developing a new and more workable climbing policy for Joshua Tree. As we indicated in our previous comments letter, we believe that the Joint Proposal submitted by the Access Fund, NPCA, The Wilderness Society, and Friends of Joshua Tree is a fair, reasonable proposal with a high likelihood of success. Although the Joint Proposal does not represent a consensus of all environmental and climbing organizations, we believe it does address effectively the fundamental requirement to protect park resources and wilderness values while preserving the unique climbing history and opportunities of the park, as well as climber safety. 8-A

We support the proposed climbing management policy to the extent it is consistent with the original Joint Proposal. However, we believe that there remain some flaws or omissions in the climbing policy. We realize that the park intends to address most of these concerns through the Climbing

8-A – Comment noted.

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COMMENTS

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Committee. Still, we believe there could be greater clarity and detail in the BWMP's climbing policy, in particular:

- There is still not enough recognition and description of Joshua Tree as one of the world's finest and most unique climbing areas. This is a serious shortcoming of the BWMP. The plan should describe the nature of the rock at Joshua Tree, and how this translates to climbing opportunities; how the climate lends itself well to climbing during the winter months, when most other climbing areas are inaccessible; how climbers comprise a significant percentage of visitors to the park, and come from all over the world to sample its unique friction, crack, and wilderness climbing; and how the Mojave Desert environment provides exceptional opportunities for solitude and communing with nature while climbing. 8-B
- There is no language pertaining to the essential role bolts and other safety anchors play in providing for a reasonably safe and enjoyable climbing experience. As you are aware, many of the most aesthetic and famous climbs in Joshua Tree depend on one or more bolts as lead protection or top/rappel anchors – these climbs simply are not possible without these tools. The plan should state directly that climbing safety anchors, including those left in place ("fixed"), are necessary to meet minimum requirements for management of Joshua Tree, including designated wilderness. 8-C
- Some of the new climbing rules are too vague. Specifically, the "interim" permit requirement for new bolted routes in non-wilderness, the yet-to-be-determined process for monitoring new route activity, and the criteria that must be satisfied before the superintendent would issue a permit for a new bolted route in wilderness, all are only partially defined at this point. It would be easier to convince climbers and other interest groups of the plan's lack of bias and support for highest-priority park mandates if some of these rules had numbers or parameters attached to them from the beginning. 8-D
- Some Access Fund members question whether the proposed climbing restrictions are really warranted. For example, despite the absence of an official "cap" on new bolted routes, there has been a gradual decline in new route activity over the past ten years in Joshua Tree. And even though there are thousands of established climbs in Joshua Tree, there is little or no evidence that this fact has caused significant degradation of the park's natural resources, had an adverse impact on park wildlife, or has diminished the experience of non-climbers in the park. 8-E
- The "cap" on new bolted routes that will be allowed in any year has yet to be determined. We recommend that the Final BWMP incorporate the route cap proposed in the Joint Proposal ("between 5 and 20 routes per year") as a baseline, which can be modified as needed in years to come. However, since this figure was originally considered to apply only to Joshua Tree wilderness, we believe the final baseline figure could be higher as it would apply to new routes throughout the park. 8-F
- Established routes in wilderness could be removed if the Park Service determines that they "infringe on the wilderness experience of others or wilderness character." We remind you that what one party finds intrusive and objectionable, another finds welcome and an enhancement of their visit to Joshua Tree. Climbing routes should not be targeted for removal unless there are documented and thoroughly considered reasons for doing so, and the Park Service should not remove bolts itself -- for liability reasons it is better that the agency request that climbers accomplish this action on their own. 8-G
- There are no guarantees that even a single new route which requires bolts will be allowed in Joshua Tree wilderness (some 85% of the park). The Access Fund recognizes that bolts are somewhat controversial, but this controversy stems mainly from personal philosophy, not from institutional position statements, inconsistency with established law (including the Wilderness Act) or NPS policy, or actual impacts to park resources and values. If there is one thing the Park Service can (and should) do to give the proposed climbing policy its best chance to succeed, it would be to quickly approve initial proposals for new bolted routes in wilderness, where these proposals do not conflict with other park values or management objectives. 8-H

Obviously, the success of the proposed climbing policy depends heavily on three things: (1) the effective and timely work of the Climbing Committee, (2) the good faith of the Park Service to implement the policy as it was intended to be implemented under the Joint Proposal, and (3) the good faith of the climbing community in honoring the new rules. The Access Fund repeats our pledge to work closely with the Park Service and the climbing community on the Climbing Committee and in raising climbers' awareness of the new rules and encouraging their compliance. However, nothing we can do

8-B – An additional description of climbing in Joshua Tree National Park has been added in the Planning Issues and Management Concerns on page 10 and 11.

8-C – A more thorough discussion of wilderness, prohibitions in wilderness, and the exceptions to those prohibitions for the administration for the purpose of the Wilderness Act has been added to the wilderness subzone section on page 22. The permanent installation of bolts in wilderness may be considered an exception to the prohibition of permanent installations in wilderness if the bolts contribute to the administration of the area for the purpose of wilderness. Trails through wilderness can provide for user safety and confine impacts to defined areas as they provide access through wilderness and provide for the enjoyment of wilderness itself. Thus, the installation of bolts can provide for climber safety, limit impacts, and provide access to climbs of exceptional quality that enhance the user's ability to experience a primitive and unconfined type of climbing experience. This language has been added to the discussion of new bolts in wilderness on page 43.

8-D – Because the National Park Service is interested in receiving recommendations and advice from the Climbing Committee on some of these issues, portions of the plan were intentionally left vague. The Climbing Committee cannot be established until a record of decision is signed, and so some of these decisions will not be made until the National Park Service receives the input of the Climbing Committee.

8-E – The National Park Service Organic Act directs the Service to preserve park resources "unimpaired," while providing for the public enjoyment of those resources. Because public enjoyment cannot be sustained if park resources are damaged or compromised, resource protection must necessarily be the Service's paramount responsibility. Within that constraint, the National Park Service must manage recreational activities and settings to protect park resources, provide for public enjoyment, promote public safety, and minimize conflicts with other visitor activities and park uses. The Service is directed to monitor recreational activities and assess their potential impacts on park resources. When there is potential for adverse impacts, the National Park Service will initiate an appropriate policy or regulations response to prohibit or control the activity and avoid the adverse impacts. Therefore, the Service should not wait until a use becomes a significant impact, but should take a proactive stance to prevent degradation to resources, an adverse impact on wildlife, or diminishment of other visitors' enjoyment from occurring. See page 28.

COMMENTS

Remarks 8-F through 8-H are continued from previous page.

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8-F – The objectives of the plan are to keep the cumulative impacts of climbing in the non-wilderness areas of the park to acceptable levels and to keep the cumulative impacts of climbing in wilderness to levels at or below 1998 conditions. The Council of Environmental Quality (CEQ) regulation (1502.2) provides for developing a plan when information is incomplete or unavailable. Additional language that describes the process the National Park Service is using to obtain the needed information has been added in the introduction to the climbing management section of the plan on pages 39 and 40.

Some of the specific numbers needed to quantify 1998 conditions were unknown at the time the supplement was prepared. In 1999, however, the National Park Service initiated steps to obtain baseline information to gauge what the 1998 impact levels were. Initial surveys focus on determining the amount of land effected by social trails, identification of flora and fauna that live in the vertical ecosystems, and determining to what extent permanent fixed anchors are used in the developed zone and backcountry transition and wilderness subzones. The National Park Service is currently conducting surveys, based on stratified sampling methodology that will be used to approximate the number of bolted routes that are present within Joshua Tree National Park. Preliminary data indicates that there are approximately 3,475 bolted routes in the park and approximately 7,128 bolts. This approximated number will be used as a target goal and will be used by the National Park Service and the Climbing Committee in evaluating requests for new bolted routes.

8-G – Comment noted.

8-H – The National Park Service cannot provide a blanket commitment to automatically approve initial requests for new bolted routes in wilderness. We will, however, make a commitment to objectively consider any such request based upon the criteria for establishing new bolted routes in wilderness.

COMMENTS

will prove to climbers that the new climbing policy deserves their support if Joshua Tree officials are perceived as being unsupportive of or even hostile to climbers' concerns, as has been the case for the past six years or more. For this reason we strongly urge the Park Service to consider and approve new route proposals in a timely manner, and to initiate needed resource studies in the very near future to permit more objective decision-making and greater public comprehension of and support for this decision-making. 8-I

Above all, we urge the NPS to acknowledge that Joshua Tree is probably the finest winter climbing area in the world, and that the agency has a responsibility to preserve the traditions, opportunities, and safety requirements of climbers in the park. 8-J

NEPA and APA Compliance

The Access Fund is sympathetic to, but does not necessarily agree with, concerns voiced by some members of the local environmental community that there may have been inconsistencies with the National Environmental Policy Act and the Administrative Procedures Act in the preparation of the BWMP. As far as we can tell, the Park Service did not make its decision to incorporate concepts and language from the Joint Proposal into the BWMP based on "off the record" and "backroom" deliberations with the co-signers of this suggested planning alternative, but rather on the significant number of comments received from the public in support of the Joint Proposal and on the merits of the proposal itself as judged by NPS planners. Meetings following the close of the public comment period between the co-signers of the Joint Proposal and Joshua Tree officials, initiated at our request and for the purpose of clarifying any elements of the Joint Proposal which were not well understood by the Park Service, did not constitute ex parte communications, as the NPS neither offered nor suggested that our discussions would have any influence on the final decision for the BWMP. Also at our request the NPS did not invite representatives from other interest groups to these meetings, as these talks were intended not to be a debate over the virtues and drawbacks of the Joint Proposal, rather an opportunity for the Park Service to hear first-hand from the co-signers what kind of process we had gone through in negotiating the proposal, and to answer any questions the park might have had about its specifics. We believe the final proposal for climbing management, as reflected in the Supplement to the Draft BWMP, was not illegally influenced by these meetings, and we do not believe the Park Service "turned the process of agency decision-making over to a handful of persons while the public was shut out of the debate." 8-K

The Access Fund disagrees strongly with the claim (also raised by a few local environmentalists) that the authorization of the placement and replacement of bolts (a type of climbing safety anchor commonly used at Joshua Tree) qualifies as an action significantly affecting the quality of the human environment. Bolts and other types of climbing anchors have been used in Joshua Tree since the 1940's, and have been used in the national park system since the late 1800's. Neither the Park Service nor any other federal agency has ever determined that the placement and use of these tools causes significant resource impacts, nor that management actions specific to this use require anything more than a "categorical exclusion" finding under NEPA. NEPA requirements are satisfied by the New Proposed Action's commitment to "keep[ing] the cumulative impacts of climbing in wilderness to levels at or below 1998 levels," by its provision for ongoing evaluations of the climbing environment at Joshua Tree, and by its creation of the Climbing Committee to work with the park staff to address all issues pertaining to climbing.

Management Zoning

The Access Fund supports the decision not to distinguish between so-called "wilderness experience classes." The Wilderness Act does not provide for wilderness to be zoned for the purpose of managing it differently according to its proximity to non-wilderness lands. The same standards for 8-L

REMARKS

8-I – The National Park Service looks forward to implementing all aspects of the *Backcountry and Wilderness Management Plan.* The plan has been many years in the development, and we have a vested interest in seeing it succeed. Its success depends greatly upon the support of the various user groups; we fully intend to foster that support. In the case of climbing management, we have already initiated several resources studies. Initial surveys focus on determining the amount of land effected by social trails, identifying flora and fauna that live in the vertical ecosystems, and determining to what extent permanent fixed anchors are used in the developed zone and backcountry transition and wilderness subzones. The National Park Service is currently conducting surveys, based on stratified sampling methodology that will be used to approximate the number of bolted routes that are present within Joshua Tree National Park.

8-J – See 8-B.

8-K – Comment noted.

8-L – Comment noted.

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REMARKS

resource protection and preservation of wilderness character should apply throughout Joshua Tree wilderness. However, the Park Service should recognize that many areas in Joshua Tree which are designated wilderness are close to and easily accessible from park roads and trailheads (in some cases no more than a five minute walk), and these areas will necessarily receive higher visitation and user impacts than remote backcountry areas. The park should monitor these areas to ensure that wilderness values are not degraded by this use.

8-L (cont.)

Trails

The Access Fund supports Alternative E's proposal to allow visitor entry and parking in remote locations with no backcountry self-registration boards. However, we are concerned that the proposal not to consider new trail requests until the designated trails are "inventoried, developed, and monitored for several years" could have unintended negative consequences. For example, it is probable that the Climbing Committee will identify climbing areas where, in the near future, multiple informal access paths need to be consolidated and perhaps signed as primary climber's access routes. These kinds of remedial actions should not be handicapped by the designated trail policy.

8-M

Summary

The Access Fund believes the New Proposed Action for climbing management represents a good-faith effort of the Park Service, climbers, and the environmental community to protect Joshua Tree's marvelous resources and values while still providing a varied and quality climbing experience. Therefore, we support the plan, subject to the comments included above. And we pledge to work hard to hold both the climbing community and the Park Service accountable for complying with and implementing the plan fairly, objectively, and in a timely manner.

We look forward to working with you and other interested groups on the Climbing Committee, and in all other productive ways to ensure that the proposed management strategy for climbing is as successful at Joshua Tree as it has been at other major climbing areas.

Respectfully,

SAM DAVIDSON
Senior Policy Analyst

8-M – The language in the proposed action does not preclude the National Park Service from taking administrative actions to mitigate resource damage by consolidating duplicate trails and rehabilitating disturbed areas. To avoid confusion, however, we have modified the sentence to clarify the that National Park Service will not consider new trail requests from the public until the trail network is inventoried, developed, and monitored for several years. See page 32.

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preserving America's diverse climbing resources.

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26 February 1998

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Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Re: Draft Backcountry & Wilderness Management Plan for Joshua Tree National Park

Dear Mr. Quintana,

This letter conveys the comments of the Access Fund on the Draft Backcountry & Wilderness Management Plan ("BWMP" or the "Draft Plan") for Joshua Tree National Park.

The Access Fund

The Access Fund is a 501(c)3 non-profit conservation and advocacy organization representing the interests of American rock and mountain climbers. The Access Fund is the largest national climbers organization, with some 7800 members. The Access Fund's mission is to keep climbing areas open, and to conserve the climbing environment. Preserving the opportunity to climb and the diversity of the climbing experience are fundamental to our mission. The Access Fund encourages an ethic of personal responsibility, self-regulation, and Leave No Trace practices among climbers; works closely with local climbers, land managers, environmental organizations, and other interest groups to manage and preserve climbing areas throughout the United States; develops and distributes climber education materials; acquires and manages land; and provides funding for conservation and impact-mitigation projects, and for scientific research relevant to the climbing environment.

The Access Fund's headquarters are located at 2475 Broadway, Boulder Colorado, 80304 (Tel. 303/545-6772). This letter is submitted through the Access Fund's Western Region Office in Salinas, California.

Many members of the Access Fund climb regularly or occasionally in Joshua Tree.

Joint proposal for climbing management policy

The Access Fund has sought to address in a proactive manner what we perceive to be the most significant flaws in the BWMP. To this end we have joined with other leading interest groups to develop an alternative climbing policy for consideration by the NPS. The process of negotiating a joint

proposal was lengthy, instructive, and ultimately highly successful. We are now pleased to offer, in conjunction with Friends of Joshua Tree, The Wilderness Society, and the National Parks & Conservation Association, the document submitted under separate cover and titled *Proposed Climbing Management Policy for Joshua Tree National Park*.

We urge you to receive this joint proposal in the spirit of cooperation and commitment to the future of Joshua Tree in which it was prepared. We further urge you to incorporate its suggestions into the Final BWMP.

General remarks

The Access Fund commends the interdisciplinary planning team for its efforts in preparing the BWMP. For a national park as unique and important as Joshua Tree, this process was no doubt a Herculean task. However, we believe there are critical shortcomings in the draft plan which should be addressed in the final document.

Since the release of the BWMP for public comment, we have been flooded by phone calls, letters and e-mail messages from climbers around the world, voicing a common alarm that the new climbing policy proposed in the Draft Plan seems as though it is conceived to discourage or even prevent climbers from visiting the park. While we do not believe the BWMP is intended to have this effect, the Access Fund shares the concern that the Proposed Action would needlessly eliminate many of the most extraordinary climbs at Joshua Tree, make it more difficult for climbers to be responsible for their own safety, fail to provide measurable, enhanced protection for park resources, and have virtually no support from climbers.

In addition, the Access Fund believes that the draft plan is weakened by an apparent lack of adherence during its preparation to relevant planning guidance afforded by the NPS Manual, especially NPS-77, Chapter 3, *Backcountry Recreation Management*. This has resulted in a plan which confuses management objectives with strategies, and proposes unprecedented restrictions on recreation which are inconsistent with other national parks and unjustified by existing or probable future conditions in Joshua Tree.

Rather than treating climbing as a unique and welcome use of the park which merits a modest investment of the park's administrative resources, the Draft Plan gives the impression that climbers are considered a "problem" in Joshua Tree. This is most evident in the fact that the Proposed Action's climbing policy is essentially Bolt Control (see "Visitor Enjoyment," BWMP at 8). This management approach is dangerously misguided. Bolts are not the most significant climbing impact, in terms of resource degradation. Moreover, you cannot control climber visitation patterns and other types of climbers' impacts by restricting bolting, as climbers will continue to visit all areas of the park with attractive geologic features regardless. The Park Service should affirm in the BWMP that climbers require bolts and other types of fixed anchors for a reasonably safe and enjoyable climbing experience in Joshua Tree. To do otherwise is more than irresponsible - it suggests a hidden agenda. 8-N 8-O

In the Proposed Action, the Park Service denies any responsibility for climbers' safety or the security and proper function of standard climbing tools (BWMP at 37), yet on the same page the agency assumes responsibility for determining when and where these tools can be used. This strikes us as highly inconsistent, and probably legally untenable. 8-P

8-N – The new proposed action prescribes a climbing management program that focuses upon all aspects of the sport that could impact park resources. Creation of social trails, impacts to soil and vegetation at the base of climbs, degradation of scenic values due to chalk and bolts (fixed anchors), and impacts to the microhabitats, including flora and fauna found on rock surfaces, are some of the impacts of climbing. Page 39.

8-O – The use of bolts as a climbing aid is described in the Planning Issues and Management Concerns section on page 10.

8-P – The National Park Service recognizes that a portion of its mission is to provide for visitor enjoyment and that that enjoyment may also be potentially hazardous. The recreational activities of some visitors may be of an especially high-risk, high-adventure type and may pose a significant personal risk to participants. Park visitors must also recognize this, and they must assume a certain degree of risk and responsibility for their own safety when visiting areas that are managed and maintained as natural, cultural, and recreational environments. The National Park Service has no prescribed mandatory visitor safety requirements. The very nature of climbing requires participants to assume responsibility for their safety.

Overall, the Draft Plan does not seem as well organized as it could be In all the alternatives there are statements and references which should be located in the Affected Environment or Environmental Consequences sections. For example, the Proposed Action is not the proper place to decide if rock climbing is an appropriate and legitimate activity. The discussion of the impact of prohibiting fixed anchors in Joshua Tree wilderness belongs under Environmental Consequences. 8-Q

The Access Fund cannot endorse, and would not support, the Proposed Action of the Draft BWMP. This alternative treats climbing as purely a bolting issue, and is simply unacceptable as far as climbers are concerned. Unless the Proposed Action is significantly revised to address climbers' concerns, the Access Fund must cast its support to Alternative D ("Minimum Requirements").

If the Proposed Action is modified according to the suggestions contained in our alternative *Proposed Climbing Management Policy*, the Access Fund would be able to endorse the plan as a reasonable compromise.

VERP

In the early 1990's the National Park Service made a widely publicized commitment to basing its general management planning on visitor use carrying capacities in the national parks. This new paradigm is known as VERP (*Visitor Experience Resource Protection*). According to NPS literature, "VERP defines carrying capacity as the type and level of visitor use that can be accommodated while sustaining desired resource and social conditions that complement the purposes of a park." The VERP framework is intended to determine resource conditions and visitor experiences that should be maintained in national park units and set up a monitoring program to ensure that these... are maintained." 8-R

During the lengthy process of preparing the BWMP, the Park Service referred often to the role of VERP in the planning process, and this framework's value in guiding identification of management goals, collection and analysis of visitor use data, and implementation of monitoring plans and related management responses to changes in levels of visitor use and resource impacts. However, we cannot find even a single allusion to VERP in the BWMP. Furthermore, the Draft Plan appears to be only occasionally consistent with the VERP framework.

The VERP framework consists of nine "elements." The BWMP appears to reflect those three elements that comprise the "framework foundation" (assembly of interdisciplinary team, public involvement strategy, statements of park purpose, primary interpretive themes, planning mandates). But the Access Fund can find very little influence of the other critical elements in the BWMP.

Four VERP elements pertaining to analysis and prescriptions are particularly important. These are:

Analyze park resources and existing visitor use. The objective of this element is to understand as fully as possible the park's resources and existing visitor uses and experiences. This analysis is supposed to be documented through a combination of maps, charts and text. The maps in the BWMP are not very helpful in describing either park resources (other than the

8-Q – Comment noted.

8-R – During the early stages of the development of the *Backcountry and Wilderness Management Plan*, park staff participated in several workshops in 1995 that addressed the Visitor Experience Resource Protection (VERP) process. Although the *Backcountry and Wilderness Management Plan* does not follow a template prescribed by VERP, the National Park Service considered and used many of the principles of VERP in the development of the *Backcountry and Wilderness Management Plan*. The VERP process was used in developing the zoning description, the proposed standards of use, and quality indicators that were intended to reinforce management objectives and themes described in the draft *General Management Plan* (1994).

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general location of roads and boundaries) or visitor use. Visitor use statistics are not presented either in graph or text format. The BWMP would benefit from much more attention to detail in this regard, so that park planners and the interested public can proceed with a reasonably accurate sense of how many people are visiting the park, their experiences and expectations while in the park, and how these experiences coincide with or are dependent on certain park resources.

Describe a potential range of visitor experiences and resource conditions, which can help identify potential prescriptive zones. Through its alternatives, the BWMP describes visitor experiences and resource conditions in Joshua Tree only superficially. There is no data included from resource inventories or other field studies.

8-R

Allocate the potential zones to specific park locations. This zoning scheme is supposed to prescribe desired future conditions, rather than merely describe existing conditions. It is not clear whether the zones identified in the BWMP describe existing or desired future conditions, nor is it clear what values or conditions distinguish one zone from another.

Select indicators and specify standards for each zone; develop a monitoring plan. Monitoring of existing conditions to enable appropriate management responses as these conditions change over time is the core of any successful management scheme. The BWMP does not adequately select indicators ("specific measurable variables that will be monitored") and specify standards ("minimum acceptable conditions") for each zone. For example, a pithy, two-sentence paragraph is not sufficient to describe the Wilderness subzone (BWMP at 16), and the standards identified here "preservation of wildness" and "primeval character and influence" are vague. What do these phrases mean, in lay person's terms? More importantly, the BWMP does not propose nor describe a monitoring plan for any identified zone or visitor use. Under VERP, a monitoring plan should "identify priorities, methods, funding, and staffing strategies, and analysis requirements."

The Access Fund supports management planning based on objective data and the proactive definition of desired conditions of park resources and visitor experiences over time. The Draft BWMP does not provide, for any use of Joshua Tree, a desired conditions model, nor does it provide more than skeletal statistical information about visitor use. This lack of consistency with VERP is one of the fundamental shortcomings of the plan, and should be corrected in the final document.

The Draft BWMP does not conform to NPS-77

Chapter 3 of the NPS manual Natural Resource Management, titled *Backcountry Recreation Management*, provides specific guidance for backcountry recreational use planning and management. This guidance relates directly to various sections of NPS Management Policies, particularly Chapter 8 (Visitor Use), and NPS-2. These guidelines are relevant to the BWMP because most of the climbing resources in the Joshua Tree are in "backcountry," according to the definition provided by Management Policies (8:3): "primitive, undeveloped portions of parks."

8-S

Although NPS-77 is referenced in the Draft Plan's bibliography, its guidance is not evident in the document.

8-S – The National Park Service Organic Act directs the Service to preserve park resources "unimpaired," while providing for the public enjoyment of those resources. The National Park Service Management Policies recognizes that public enjoyment cannot be sustained if park resources are damaged or compromised. Thus, resource protection must necessarily be the Service's paramount responsibility. Within that constraint, the National Park Service must manage recreational activities and setting to protect park resources, provide for public enjoyment, promote public safety, and minimize conflicts with other visitor activities and park uses. The Service is directed to monitor recreational activities and assess their potential impacts on park resources. When there is potential for adverse impacts, the National Park Service will initiate an appropriate policy or regulations response to prohibit or control the activity and avoid the adverse impacts. Therefore, the Service should take a proactive stance to prevent degradation of resources, an adverse impact on wildlife, or diminishment of other visitors' enjoyment from occurring. In addition, the new proposed action, alternative E, addresses many of your concerns.

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One objective which NPS-77 states must guide management of recreational activities in national parks is "protection of unique or important backcountry recreational opportunities by avoiding inadvertent changes in the recreational experience." This objective is not achieved by the proposed climbing policy in the BWMP, as "inadvertent changes in the ... experience" of climbers will result from several proposed management actions, especially the ban on placement and replacement of fixed anchors in park wilderness. The ultimate effect of this action would be to eliminate hundreds of the best technical climbing experiences in Joshua Tree.

Of critical importance to planning for recreation management is the NPS-77 guidance on establishment and implementation of restrictions on use. Under *Policy & Program Objectives*, NPS-77 states "limitations imposed on recreational uses should be the minimum necessary required to achieve objectives." Under *Program Guidance*, NPS-77 states

> Any restrictions on use should directly relate to the accomplishment of specific management objectives identified in the plan, or resolve specific, documented impacts. Where restrictions are imposed, they should be implemented on a graduated scale from indirect controls such as public education... to direct controls such as use limitations and area closures. (NPS-77 at 75)

8-S

The Proposed Action can hardly be considered the "minimum necessary," as far as management prescriptions for climbing impacts are concerned. In addition, there is no "management objective" provided to justify the proposed ban on placement and replacement of bolts in park wilderness.

NPS-77 provides specific guidance for developing management objectives It states

> specific management objectives should be described and linked to critical resources identified through the park's resource inventory program or through the public involvement process on the plan. These objectives should be specific enough for the park to measure them.
>
> One of the most important management objectives... relates to the determination of appropriate use levels. Th[is] objective should outline how much resource degradation will be acceptable to park management.

The General Management Plan for Joshua Tree states that no further decisions will be made on climbing management until scientific studies of the climbing environment have been completed. Whatever studies were completed are not referenced in the BWMP, and it seems likely that additional studies have yet to be undertaken. The Proposed Action also fails to link management objectives to the extensive public input provided prior to release of the Draft Plan. Therefore the Proposed Action's restrictions on climbing are premature and in conflict with specific direction provided by the GMP.

8-T

8-T – A few studies have been completed. These include *The Effect of Rock Climbers on Raptor Nest Site Selection, and General Raptor Survey in Joshua Tree National Park* by Torab, 1997; *Impact of Rock Climbing on Bird and Plant Diversity in Joshua Tree National Park, California*, by Camp, 1995. In addition, see 8-F.

NPS-77 also provides guidance for the "action" element of a recreational use management plan. This is the

> prescription by which the park will achieve the management objectives. The action plan must identify the range of remedial actions to be undertaken if the management objectives are not being achieved. The action plan should

8-U

8-U – Development of new facilities to support climbing activities are not proposed at this time.

> also contain an identification of any facilities which are necessary to support the recreational activities...

The BWMP does not provide a "range of remedial actions to be undertaken" for climbing management (or for management of any of the park's recreational uses). The BWMP also fails to identify "facilities" such as a walk-in campground, additional parking sites, and outhouses that may be necessary to support climbing and other recreation in Joshua Tree. 8-U

Joshua Tree is one of the world's finest climbing areas, and should be recognized and preserved as such. 8-V

8-V – Comment noted.

In general, the Access Fund supports the proposition contained in Alternative D, to "manage [climbing] as one of the primary purposes of Joshua Tree National Park." However, we would not support the rest of the climbing policy proposed under Alternative D, which is so blatantly relaxed in terms of a balance between climbing and resource protection as to suggest the Park Service views this alternative a "sacrifice" proposal which is not intended for serious consideration.

Joshua Tree is widely considered by climbers to be one of the world's best and most unique climbing areas. The geologic qualities of the park's quartz monzonite rock formations make possible perhaps the world's finest "friction" and moderate-angle "face" climbing. The aesthetic qualities of these formations, remarkable in their myriad shapes and hues, are enhanced by the desert environment. The climate is such that technical climbing is possible throughout the winter season, when most other climbing areas in the United States are not suitable for this activity. As climbers often visit backcountry areas in the park, they occasionally have marvelous encounters with wildlife, such as the desert bighorn, the bobcat, rattlesnakes, the desert tortoise, and other fauna rarely seen in the campgrounds and near the roads. All of these and other factors combine to make Joshua Tree a true "climber's paradise." 8-W

8-W – See 8-B.

The Park Service should recognize and describe the importance of Joshua Tree as a climbing resource, and should articulate the approach it will take to preserve this outstanding value of a major national park. One of the most egregious flaws in the BWMP is that it fails to do this. There is only one sentence in the Draft Plan's introduction (under "Recreational Resources," p 5) which alludes to the park's outstanding climbing opportunities, and none that makes note of its status as a "must-visit" destination which draws climbers from around the world. In fact, it almost seems as though the Draft Plan goes to great lengths to avoid acknowledging the significance of the park as an international climbing resource.

Although climbers may represent a greater management challenge than windshield tourists, they should be made to feel no less welcome in Joshua Tree.

Climbing in wilderness

The Wilderness Act has never been interpreted by the National Park Service to prohibit fixed anchors in designated wilderness. If this interpretation is accepted, it necessarily means all federal wilderness managers have been managing the resource improperly and perhaps illegally since 1964. It also means Congress should not have designated as wilderness 8-X

8-X – See 8-C.

hundreds of thousands of acres of public lands where fixed anchors have been commonly used since the early part of this century.

Neither Congress nor NPS wilderness managers have previously construed the Wilderness Act to suggest that fixed anchors "detract from wilderness" (BWMP at 36). If this had been the case, we would find reflected in the record (the laws enacted in 1976 and 1994 which established Joshua Tree wilderness) a concern over this type of wilderness use, but there is no such concern. In any case, the BWMP's proposal under Alternative D that fixed anchors "would not be limited" is an admission that NPS planners view fixed anchors as legal in wilderness, and apparently not a significant threat to wilderness values.

8-X

Under "Planning Direction" in the BWMP's introduction (BWMP at 4), the plan briefly describes the influence of the Wilderness Act on park planning and resource management. The plan quotes very selectively from the Act. In actuality, the Wilderness Act in Section 2(c) further defines wilderness to mean "an area of undeveloped Federal land...which is protected and managed so as to preserve its natural conditions and which (1) *generally appears to have affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable*" (emphasis added). Wilderness is explicitly intended under the Act to provide "outstanding opportunities for solitude or a primitive and unconfined type of recreation." Climbing is an archetypal example of primitive and unconfined recreation. If the BWMP is going to quote from the Wilderness Act, that language which directly supports recreational uses of wilderness should be included.

Rather than adopt the unprecedented and highly questionable position that fixed anchors are somehow antithetical to wilderness, the park should manage this use as an "imprint of man's work" which must be "substantially unnoticeable" in wilderness. A limited use of fixed anchors should be considered the "minimum requirement" for administration of climbing in Joshua Tree wilderness.

The Access Fund also is concerned that the BWMP does not identify those resources in the climbing environment (individual rock formations or clusters of rocks) which are bisected or crossed by a wilderness boundary, nor how these areas will be managed. An example of this situation is Saddle Rocks, a very popular climbing area in the park. Will (or must) these areas be treated as wilderness? This question should be addressed so that climbing policy (i.e. placement of fixed anchors) for such areas is clear.

The Bolting Advisory Committee

The BWMP proposes the formation of a "bolting advisory subcommittee" of the formal Joshua Tree National Park Advisory Commission, to make recommendations to the superintendent on applications for permits to place new bolts in the park. As proposed, this advisory body would have zero credibility with climbers. The Access Fund has two things to say about this: (1) any "committee" which advises the park on climbing issues must have a significant component of active climbers on it to be credible; and (2) a group formed to advise the park on fixed anchor issues is probably best set up as an informal body, to avoid complications with FACA.

8-Y

8-Y – The Climbing Committee section of the plan has been revised in the new proposed action. Please refer to page 41.

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Primary Interpretive Themes

The Access Funds supports the interpretive themes identified as "most important" in the introduction to the BWMP (BWMP at 6). We suggest, however, the addition of a seventh theme: that close, personal, hands-on interaction between a park visitor and the park's natural resources can provide a lasting benefit in terms of personal growth and awareness. Joshua Tree is the kind of place where people can readily see and connect with the marvelous virtuosity of Nature. This kind of connection is likely to lead to increased public support for long-term protection of the park.

8-Z

8-Z – The development of interpretive themes is beyond the scope of this document. Those themes are developed in the park's Interpretive Prospectus.

Planning Issues and Management Concerns

The Access Fund does not disagree that "the use of fixed anchors... has created a need to evaluate whether [this use] is compatible with wilderness values..." (BWMP at 8) However, there is no such evaluation conducted or referenced anywhere in the Draft Plan. Presumably a serious, objective evaluation of this issue would assist the Park Service to develop a rational and effective policy for managing fixed anchors. The Access Fund would be pleased to assist the Park Service in designing and carrying out such an evaluation.

8-AA

8-AA – See the section about new bolts within wilderness in the new proposed action, (alternative E) on pages 43 and 44.

Redescription of 1995 GMP Zoning

The Access Fund shares the concern of some members of the environmental community that the subdivision of park wilderness into two "experience classes" could affect the way these areas are administered or considered philosophically by either the Park Service or park visitors. However, we do support the application of the Wilderness Recreation Opportunity Spectrum developed by the US Forest Service to management of recreation in Joshua Tree wilderness. The WROS provides a rational basis for ensuring that wilderness resources and values, as well as a variety of recreation experiences, are preserved throughout the wilderness.

8-BB

8-BB – Wilderness experience classes have been eliminated in the new proposed action.

Proposed Additions to Designated Park Wilderness

The Access Fund supports the recommended "minor additions" (9,060 acres) of park lands to the park's designated wilderness.

8-CC

8-CC – Comment noted.

Trails

In general, the Access Fund supports the expansion of the park's system of designated trails. This action will help reduce impacts from "social trails," and will provide access for a variety of recreational experiences. However, we find an irony, and a management bias, in the fact that the BWMP proposes major restrictions on fixed anchors, whose cumulative impact on park resources is negligible, in wilderness while proposing to designate and/or build some 270 miles of trails in the backcountry of the park. Just as "the construction and maintenance of trails in wilderness is necessary for the proper administration and protection of wilderness" (BWMP at 27), so are fixed anchors required for the "proper administration and protection" of the wilderness climbing environment.

8-DD

8-DD – Refer to the Climbing Management section of the new proposed action on pages 39-46.

In particular, we question whether it is a good idea to designate a trail through the Wonderland of Rocks, connecting Keys View to Indian Cove. The terrain throughout Joshua Tree permits passage on foot through virtually all areas in the park. Why encourage more visitation to the heart of the park's interior wilderness by designating and mapping a formal trail? Let visitors seeking a greater degree of adventure and solitude discover this natural passage for themselves, through their own initiative. 8-EE

8-EE – There is no proposal for a trail through the Wonderland of Rocks that connects Keys View to Indian Cove. This document addresses the natural zone of the park. Parking areas would be addressed in the *General Management Plan.*

The Access Fund supports the designation of "equestrian corridors" and trails for off-road bicycling.

It is not at all clear from the Draft Plan how the park will accommodate the parking needs of trail users. Where will the designated equestrian parking locations be? Will there be additional parking opportunities provided for visitors wishing to access the backcountry from new trailheads created as part of the expansion of the trail system?

Roads

The Park Service already has closed many miles of historically traveled roads throughout the park. This has increased the difficulty of access to some of the most appealing areas in Joshua Tree, especially in the eastern park lands. These road closures have effectively precluded the average visitor from ever again being able to get into this portion of the park. It is now an unreasonably long hike to access the Cockscomb Mountains, the Eagle Mountains, and other areas of particular interest in the east park. The Access Fund recommends that in addition to the designation of roads described in the Proposed Action, the BWMP include the reopening of certain other roads, such as Big Wash (a road which follows an active wash and has been driven for the past 60-70 years). 8-FF

8-FF – Comments noted.

As noted in the Draft Plan, some parks roads may be found to constitute rights of public highway under RS 2477 (BWMP at 36). The Park Service should carefully consider whether to include all such candidate through-ways in the proposed road designation system, so as to preclude future problems with RS 2477 claims.

Group Size and Backcountry Camping

The Draft Plan does not provide enough use statistics or other objective information to justify the group size permit requirements described in the Proposed Action (BWMP at 38). Commercial users such as Outward Bound are already required to limit group size as part of their commercial use licenses. 8-GG

8-GG – Comments noted.

The Access Fund supports the proposal to allow backcountry overnight group camping anywhere in the Joshua Tree backcountry that is generally open to the public, except those sites, such as Areas of Critical Environmental Concern, which may be able to sustain occasional day use visitation but not the more lasting impacts which may result from overnight camping.

Other Alternatives

The BWMP does not offer a reasonable range of alternatives, especially with respect to climbing management. The No Action alternative amounts to a perpetuation of present management policies, many of which were probably 8-HH

8-HH – Refer to the new proposed action, alternative E.

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implemented without a NEPA analysis and public review process, and which the Park Service has already stated need to be revised. As noted above, the Minimum Requirements alternative is also unreasonable, both in the likelihood of its adoption and its wild swing toward favoring recreation over resource protection. The Maximum Protection alternative is equally imbalanced, but in the other direction. With respect to climbing policy, the range of alternatives need to include proposals which are based on something other than what amounts to a personal or perhaps bureaucratic opinion that fixed anchors detract from wilderness.

The Affected Environment

The "Visitor Activities" section of the Draft Plan (BWMP at 71) provides remarkably little information about recreational uses of Joshua Tree. Interpreting backcountry camping data to imply that all recreational use of the backcountry has increased seems neither scientific nor logical. The Park Service should identify methods of measuring backcountry visitation at Joshua Tree on a use by use basis (perhaps through trailhead surveys).

8-11

This section is superficial in its description of visitor use at Joshua Tree and, therefore, is not very useful. With respect to climbing management, the BWMP would be improved if this section described the total number of climbers who visit the park on an annual basis, climber-visits as a percentage of total visitation, the different types of climbing experiences afforded by the park, the park's climbing history, and perhaps a map showing where climbing activities are concentrated.

8-II – Additional information about climbing in Joshua Tree National Park has been added to the climbing management section of the new proposed action, alternative E and the Visitor Activities section of the Affected Environment.

Environmental Consequences

The BWMP at 76-78 ("Impacts on Natural and Cultural Resources") makes no mention of the probable impacts of climbing activities (or any other type of recreational use) on natural and cultural resources for any alternative. Rather than a presentation of findings of scientific or other objective analysis, this section seems to be merely a compilation of declarative statements that are not supported by any evidence, data, or information provided elsewhere in the EIS. These statements are evidently mere opinions of Park Service planners, and are therefore suspect as a basis for management actions.

8-JJ

Under the Proposed Action, climbing would not be permitted within 50 feet of any cultural resource. What is the basis for the 50 foot standard of separation? The Access Fund recommends that the Park Service inventory cultural sites and analyze climbing activities near these sites to determine, on a case-by-case basis, what level of use restrictions may be necessary. In some cases 50 feet may be insufficient to protect cultural resources, while in others it may well be excessive to achieve the desired level of protection.

The BWMP says on page 79 ("Visitor Enjoyment") that under the Proposed Action "rock climbing would continue throughout the park." We respectfully disagree with this assertion. Based on the Draft Plan's statement that more than one-third of all climbing routes in Joshua Tree wilderness have one or more fixed anchors, the Proposed Action would eliminate climbing in some (perhaps many) areas of the park. However, we also disagree with the BWMP's assessment of the number of climbing routes affected by the Proposed Action. Perhaps most importantly, the BWMP also fails to consider the quality of the climbing routes affected. A majority of the highest quality climbs in Joshua

8-JJ – This section of the plan was rewritten in the Supplement.

Tree are located in designated wilderness and are dependent on one or more fixed anchors. The elimination of these routes through the ban on replacement of bolts would significantly diminish the overall climbing experience at Joshua Tree, and would alter the signature uniqueness of Joshua Tree as a world class climbing area.

8-JJ

As acknowledged in the plan, much of the climbing is in Joshua Tree wilderness is bolt dependent. If climbers are prohibited from replacing these anchors periodically, these tools will become unsafe and unusable, effectively rendering these routes unclimbable. This section of the plan needs to recognize that the opportunity for climbing established routes and exploring new ones in Joshua Tree wilderness will be greatly diminished by the Proposed Action, and to quantitatively address how many climbs would be affected.

Summary

The Access Fund believes the Draft BWMP is not yet complete. The numerous shortcomings identified above should be addressed, in order for this plan to have the understanding and support from the public that are essential for successful implementation of any management plan.

Specifically, our primary concerns are:

The Draft Plan is not thorough enough in its presentation of existing and desired future conditions and uses to be very useful.

8-KK

8-KK – Comments noted.

The Park Service appears to have ignored many reasonable recommendations submitted by the public earlier in the planning process; to encourage public investment in the need for this plan and its ultimate success, public input should at least be referenced in the plan, and then, if this input is rejected, the plan should explain why.

The Proposed Action would needlessly eliminate many of the best climbing experiences at Joshua Tree, and would make it more difficult for climbers to be responsible for their own safety.

The Proposed Action's climbing policy is essentially Bolt Control, a misguided and ineffectual management response.

The Draft Plan does not adhere closely enough to guidance provided by NPS-77 or VERP.

Unless the Proposed Action is significantly revised to address climbers' concerns, the Access Fund must cast its support to Alternative D ("Minimum Requirements"). If the Proposed Action is modified to incorporate the key suggestions contained in our alternative *Proposed Climbing Management Policy*, the Access Fund would be able to endorse the final plan as a reasonable compromise.

The Access Fund recommends that the BWMP be amended to reflect the importance of Joshua Tree to climbers; to more accurately quantify the resource impacts caused by recreational activities, and to describe the point at which levels of these impacts become unacceptable; to review the full range of management prescriptions which may be considered to address such impacts; to more thoroughly and objectively analyze the probable effects on the human environment (especially technical climbing) which would derive from proposed

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management actions; and to become consistent with established resource and recreation management guidelines.

Sincerely,

SAM DAVIDSON
Senior Policy Analyst
The Access Fund

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MAR 2 1998

Access Fund
The Wilderness Society
Friends of Joshua Tree
National Parks and Conservation Association

RE: ALTERNATIVE CLIMBING MANAGEMENT POLICY FOR JOSHUA TREE NATIONAL PARK

Dear Superintendent Quintana:

Attached to this letter is our proposed alternative to the climbing policy contained in the preferred alternative of the Draft Backcountry and Wilderness Management Plan (Draft Plan) for Joshua Tree. We believe this proposal would be more effective in preserving the character and values of Joshua Tree National Park than the climbing policy proposed in the Draft Plan. We also believe it will be much more broadly accepted and supported by the climbing community, and will provide a solid basis for preserving park and wilderness values.

To be successful, this process must be implemented honestly, fairly, and in a timely manner. NPS actions need to be based to the greatest extent possible on objective information.

The difference between this proposal and the climbing policy proposed under the Draft Plan is that this proposal would:

1) focus climbing management policy on all aspects of climbing that have detrimental impacts to park resources, not simply placement of fixed anchors;

2) restrict or prohibit climbing and fixed anchor use in areas of particular environmental sensitivity, and provide a process for designating areas within wilderness as "Fixed Anchor Free" sites;

3) allow replacement of fixed anchors in wilderness;

4) develop a process for determining which fixed anchors in the park should be removed; and

5) establish a process by which placement of new fixed anchors could be considered in wilderness under an application and permit system.

Joshua Tree National Park was established to preserve the pristine natural resources of the Mojave and Colorado Deserts, as well as its cultural values. Given that the cultural and natural values for which Joshua Tree National Park and its wilderness was designated are finite, and that the overriding priority for management of these resources is their preservation, this proposal recognizes that there must be limits to all recreational activities within the park, including rock climbing.

Joshua Tree is also widely considered one of the finest and most unique climbing areas in the world. The geologic qualities of the park's monzonite granite formations provide perhaps the world's best moderate-angle "friction" and "face" climbing, and the park has relatively mild weather throughout the winter when most other American climbing areas are shut down by cold or wet conditions. Many of Joshua Tree's most popular rock climbs rely in part or in whole on fixed anchors for ascent or descent. This proposal recognizes that Joshua Tree has been a popular rock climbing area for decades, that thousands of climbing routes have been established throughout the park, and that the increasing popularity of rock climbing, combined with the region's expanding population, will probably lead to increased pressure on Joshua Tree's resources from rock climbers.

This proposal recognizes that the use of fixed anchors is only one of several aspects of rock climbing that can cause degradation of park and wilderness character. Creation of social trails, impacts to soil and vegetation at the base of climbs, degradation of scenic values due to chalk use, and the negative impacts to the microhabitats, including flora and fauna, found on rock surfaces are some of the other real impacts of climbing.

As the type and intensity of climbing and the need for use of fixed anchors varies from one park and wilderness to the next, the appropriate use of fixed anchors should be determined at each park. The wilderness manager should ensure that use of fixed anchors will be the minimum necessary, substantially unnoticeable, and an insignificant impact on wilderness character and values.

Please accept this proposal as a part of the public comment process for the Backcountry and Wilderness Management Plan. Our organizations intend to submit additional comments separately. We look forward to discussing this proposal with you.

Sincerely,

for
Sam Davidson, Access Fund

for
Norbert Riedy, The Wilderness Society

for
Cyndie Bransford, Friends of Joshua Tree

Brian Huse, National Parks and Conservation Association

Proposed Climbing Management Policy for Joshua Tree National Park

CLIMBING ACCESS TRAILS

The lack of designated trails providing access to climbing areas has resulted in a network of "social trails" criss-crossing large areas between parking locations and rock faces. These trails are used primarily by climbers, but also by other park visitors, and have seriously degraded biological resources in a number of areas. The Park and the climbing community have begun to address this problem through an informal identification of trails that should be designated as access to rock faces and allow the closure of other trails.

The process of identifying designated climbing access trails, closing unnecessary social trails, and restoring environments damaged by unfocused foot traffic should be formalized. This process should include:

an inventory of social trails
designation of the minimum number of trails needed for climbers' access to climbing areas and routes
physical barriers to access trails closed to protect sensitive resources
closures signs
signs with maps identifying designated access routes at parking areas
coordination with local and national climbing organizations to assist with resource evaluation and climber education

BASE OF CLIMBS

Areas at the base of rock faces which feature popular climbing routes experience intensive use by climbers and other visitors who are observing the climbing. These areas become informal areas for socializing and day-long congregation. This intensive use has seriously degraded the soil and vegetation resources at the base of many climbing areas.

The NPS should survey resource damage at the base of popular climbing areas. Based on the level of resource impacts, the Park Service should do one or more of the following:

develop recovery plans for restoration of soils and vegetation;
2 establish a designated route and access point for a specific climbing area; and/or
3 restrict access on a temporary or permanent basis depending on level of damage and sensitivity of resources present.

CHALK

The use of gymnast's chalk by climbers has degraded some of Joshua Tree National Park's scenic resources. Rock faces in many locations have portions of climbing routes marked in white from the use of chalk. In some locations, these markings disrupt the natural patterns of rock and lichen. Although chalk marks in most locations are rinsed off by rain part of the year, some chalk deposits persist, especially under overhangs and on the most popular routes.

Restrictions on chalk use should begin with outreach to climbers, including requests for climber-initiated clean-ups of heavily chalked routes; a rule that "chalk balls," which limit release of chalk onto the hands, must be used; and a period of evaluation of the success of these measures. If scenic values are not restored or protected by these measures, chalk use should be prohibited. For areas which have been significantly degraded by climbers' use of chalk, we recommend that:

COMMENTS

1 Regular chalk clean-ups be undertaken by volunteers from the climbing community (who can rappel down routes and hand wash with water and soft-bristled brushes). Monitor the affected routes to see how long it takes for chalk to build-up to unacceptable levels. If build-up is slow, this technique may be satisfactory to deal with this problem over the long run.
2. If chalk build-up occurs rapidly after cleaning, voluntary restrictions should be explored and tested.
3. If step 2 is unsuccessful, mandatory restrictions on chalk use should be initiated.
4. If step 3 is unsuccessful, NPS should prohibit the use of chalk in affected scenic areas.

FIXED ANCHORS

I. Non-wilderness

Climbing is permitted throughout the Backcountry Transition Subzone (BTZ), except in (1) areas closed to general public use; (2) Keys Ranch; and (3) areas identified by the NPS as containing especially sensitive resources that may be adversely affected by climbing activities. Such sites should be identified and protected on an ongoing basis. Climbers may replace existing fixed anchors as necessary according to the Fixed Anchor Guidelines set forth below.

The BTZ should be surveyed within one year of final approval of the BWMP to identify areas where fixed anchors have resulted in significant impacts to resources and/or the visitor experience. High densities of fixed anchors, visible marking by chalk, and trampling of vegetation at the base of climbs are examples of indicators which may require management prescriptions. These prescriptions may take the form of relocation of approach and decent routes or specific fixed anchors, closures, restrictions, designation of fixed-anchor free zones, etc. Placement of new fixed anchors should be permitted within this zone, except where explicitly prohibited, following establishment of a system for reporting new routes.

Climbers should report new routes/new fixed anchors within seven days of their establishment to the NPS, through a process to be worked out by climbers and the NPS. NPS should monitor the level of new route/new fixed anchor activity in the BTZ, and impose further restrictions for new routes and/or new fixed anchors in this zone if the potential for resource degradation becomes unacceptable. Management of new route and new fixed anchor use in this zone may be assisted by development of a "desired conditions over time" schedule, which could include a limit on the number of new routes that would be allowed annually.

II. Wilderness

As there are many climbing routes already established in the park's wilderness, park managers should consider, on an ongoing basis, whether additional routes which require fixed anchors are justified. We recommend using the process outlined below.

Existing fixed anchors may be replaced in Joshua Tree's designated and proposed wilderness, on a piece-by-piece basis (e.g. bolt for bolt) without a permit, provided the replacement satisfies the Fixed Anchor Guidelines. Existing fixed anchors which are identified by the NPS as infringing on the wilderness experience of other visitors or wilderness character should be camouflaged or removed by the climbing community as determined by NPS. In general, the NPS should ensure that future levels of climbing-related impacts in wilderness do not exceed present levels, and will take actions to reduce existing impacts wherever possible.

- Given the number of existing climbs using fixed anchors, the number of climbers that continue to visit Joshua Tree, and the potential for increasingly unacceptable levels of resource impacts and social conflicts, the creation of new routes requiring fixed anchors should be authorized by the Superintendent of the Park.

COMMENTS

Requests to the Superintendent for creation of new routes using fixed anchors should be made through a standing committee of climbers, under the auspices of the Friends of Joshua Tree and/or the Access Fund. The standing committee should review all proposals based on criteria provided by NPS as outlined below.

- The NPS should permit only a limited number of new climbing routes requiring fixed anchors per year. This "cap" should be determined by the NPS with input from the climbers committee, the general public and environmental groups; as well as information from pertinent surveys, studies, and resource evaluations. The new route cap may vary from one year to the next, but should always reflect the commitment to keep the cumulative impacts of climbing in wilderness to levels at or below existing conditions. We recommend that initially the new route cap be set at a number between five and twenty routes per year.

  Before issuing a permit, the Park Service should review any new route proposals to determine:
  1) that a route does not have potential to lead to significant resource impacts;
  2) the proposal does not conflict with the protection of wilderness values;
  3) the route is likely to cause minimal impact on the experience of other wilderness visitors; and
  4) the route is an independent line, suitably distant from existing routes, or is a variation to an existing line that will provide an exceptional climbing experience.

  All four criteria must be met prior to approving the placement of new fixed anchors.

- The Park Service may also authorize placement of new fixed anchors not associated with a new route, for purposes of reducing other climbing impacts, and/or to address climber safety issues. Such placements will also require submission and approval of a proposal.

- No new routes requiring fixed anchors should be allowed within the Fixed-Anchor Free Zone.

This approach is designed to encourage climbers to take responsibility for and consider the implications of their activities on park and wilderness resources. The creation of a committee to assess proposals for new routes employing fixed anchors will help ensure that all pertinent issues are considered by climbers before a proposal reaches the NPS. This will help integrate conservation issues in decisions about establishing new routes and help the NPS avoid having to respond to ill-conceived, redundant, and uncoordinated proposals.

III. Fixed-anchor Free Zone

The purpose of this zone is to preserve some areas within the park completely unaffected by the presence of fixed anchors. No type of fixed climbing anchor may be placed. All existing fixed anchors in these areas will be removed. Climbers will be responsible for working with park personnel to develop a timetable for removing fixed anchors, and will help publicize the restrictions on climbing in this zone. These zones will be identified by the Park Service, using feedback from the general public, the climbers committee, and environmental groups. In evaluating an area for designation as a Fixed Anchor Free Zone, the NPS should consider:

- benefits to visitor experience;
- potential for protecting biological resources, such as plants and wildlife;
- protection of cultural resources;
- protection of scientific values
- the popularity and/or historical importance of the area to climbers;
- whether there is a concentration of established routes in the area, and whether there are especially high-quality climbs (as described in the climber's guidebook);
- the area's potential for new route exploration;
- the uniqueness of rock formations in the area, and the extent to which geologic shapes and rock qualities in the area contribute to the diversity of climbing experiences in Joshua Tree;
  sensitivity of the resources;
  the level of human activity and previous disturbance;
- conflicts with other user groups;
- and most importantly, the protection of wilderness character.

The Fixed Anchor Free Zones may be areas of special value or concern, where fixed anchor placements could cause significant and lasting harm to wilderness character, where other resource values, such as solitude (or other visitor experiences), plant and wildlife habitat, or cultural values, could benefit from infrequent climbing activity or where existing fixed anchors have been determined to be a significant intrusion on the wilderness experience.

Proposed fixed anchor free zones

The following areas are intended to serve as examples of the types of areas and resources that should be considered for designation as Fixed-Anchor Free Zones:

- the Cockscomb Mountains
- the Little San Bernardino Mountains (excluding east of Covington Flat)
- the Hexie Mountains (excluding Stirrup Tank area)
- the Cottonwood area and other areas east of Pinto Basin Rd.
- the Pinto Mountains
  rock formations which form "corridors" along washes providing access to the Wonderland of Rocks from the Barker Dam area (would not include major formations which are merely visible from Barker Dam and the Wonderland Valley, such as the Astro Domes, the Freak Brothers Dome, Surprise Rock, Foolproof Tower, Sargent Rock, Lakeside Rock, Escape Rock, and Rat Rock).

IV. Management Guidelines

We recommend the NPS adopt the following guidelines for managing fixed anchors in Joshua Tree.

1. Mandate use of neutral or rock-colored bolt hangers and chain for all new bolt placements and for replacement of existing bolts throughout the park.

2 Set goal for replacement of 90% of all bolt hangers with neutral- or rock-colored hangers in the wilderness within two years.

3 Set goal for replacement of 90% of all bolt hangers with neutral- or rock-colored hangers in the Backcountry Transition Zone within five years.

4. Set goal for identification of all fixed anchors in the wilderness which cause social conflicts or otherwise intrude on the wilderness experience, within one year. Remove or camouflage all such anchors within two years.

5. Set goal for replacement of all visually intrusive belay/rappel anchors (slings or webbing) in the park with neutral- or rock-colored anchors which do not require future use of slings, within two years.

6. Replacement of existing bolts shall be accomplished in a manner which removes the old bolt with minimum damage to the rock resource. Whenever possible, the existing bolt hole will be utilized for the replacement bolt. If use of the existing hole is not possible, the old hole will be filled with a natural colored rock material blended with bonding agents to permanently fill the hole.

7. Power drills are prohibited in wilderness. Use of power drills in non wilderness areas, for example to replace existing bolts, should require authorization by the Superintendent under a special use permit.

8. All new route climbing, including establishment of routes in areas where new fixed anchor placements do not require a permit, will be reported to the park to allow for proper monitoring of use and impacts. Simple printed forms will be available at various locations which climbers will use to report new route and new fixed anchor activities. These forms will be developed by the park based on feedback from resource professionals, and from members of the climbing and environmental communities. The climbing community will assist the park to publicize the climbing management process, the existence and use of the monitoring forms, and the location and need for restrictions.

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CNRCC DESERT COMMITTEE

January 19, 1999

Ernest Quintana, Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Re: Supplemental Draft Backcountry & Wilderness Management Plan

Dear Superintendent Quintana:

We are writing on behalf of the California/Nevada Regional Conservation Committee Desert Committee of the Sierra Club with regard to the above-referenced Backcountry and Wilderness Management Plan for the Park (hereinafter "Supplement"). We appreciate the opportunity to comment which NPS provided by recirculating the document as a supplement to the original Draft Backcountry & Wilderness Management Plan (hereinafter "original Draft"). We also appreciate the additional time allotted for comment in view of the intervening holidays, per our and the Access Fund's request.

Did recirculation of the Supplemental Plan/EIS provide another opportunity for public comment? Yes. Did it provide the necessary NEPA analysis, compliance with the Wilderness Act, Organic Act, and Federal Advisory Committee Act? Unfortunately, no.

We will not reiterate in detail the various objections we have raised on these issues heretofore. But we do request that all our prior comments, as well as the prior comments of the local Sierra Club Chapter and Group, be incorporated as comments on the Supplement as well. Our additional comments are as follows:

DEFERRAL/PIECEMEALING OF ANALYSIS AND MITIGATION

The Supplement proposes new actions not contemplated in the original Draft:

1. It allows placement/replacement of fixed anchors in wilderness;
2. It provides for "the option to initiate a study for future consideration of an additional 4-wheel/primitive campsite in the new lands" (those added to the park in 1994)
3. At the discretion of the Superintendent, it provides for "study " (and potentially approval of) llama use in the Park"
4. It permits construction of a mountain bike trail from Berdoo Canyon to Thermal Canyon

9-A

9-A – The designation of a mountain bike trail from Berdoo Canyon to Thermal Canyon is not a new action; it was proposed and analyzed in the original draft *Backcountry and Wilderness Management Plan* page 64. The option to establish a parking area in Thermal Canyon and to study an additional 4-wheel/primitive campsite in the Little San Bernardino Mountains and the use of llamas in the park were included in the plan based upon the recommendation of the Joshua Tree National Park Advisory Commission. The National Park Service has the right to give further consideration and evaluation to new actions that were raised during the public comment period. These are discreet events that can be analyzed on their own. The National Park Service is committed to doing the appropriate environmental analysis, which would include public review and comment, prior to making any decision on these actions.

Section 1502.22 of CEQ regulations provides an avenue for an agency to continue forward with the planning process in cases where there is incomplete or unavailable information. The National Park Service has added language to the Supplement to fulfill the requirements of Section 1502.22.

5. It permits establishment of a parking area in Thermal Canyon

As to each of the above, the Supplement gives virtually no information on resources to be impacted, and it defers analysis and mitigation to a future time. These deficiencies violate NEPA, since the prime purpose of an EIS is to provide comprehensive analysis and mitigation in a timely fashion, so that the agency and public can make an informed decision without piecemealing the decision-making process. 9-A

WILDERNESS REVIEW

Repeatedly Sierra Club has requested a definitive description of the affected environment for both the Park's existing wilderness and its potential wilderness areas. The Supplement's revised climbing policy (alternative E) mandates that accurate information on existing Park wilderness be available in order to assess impacts (see our 7/98 letter, enclosed). Without knowledge of the unusually pristine condition of Joshua Tree's wilderness, it is impossible to weigh the impacts of existing and/or increased climbing activity caused by fixed anchor placement. 9-B

The revisions to the automobile camping policy, namely the Supplement's proposal to "have the option to study " a 4wd campsite in the Little San Bernardinos, as well as the revision of the trail policy to establish a mountain bike trail plus a trailhead parking area in the Little San Bernardinos, underscore the need to assess wilderness potential in that area. The area in question is the lands added to the Park in 1994 in the Little San Bernardinos lying west of Pinkham Canyon Road. In keeping with the spirit of the Wilderness Act, NPS needs to study every roadless area of 5,000 contiguous acres or more to determine its suitability for preservation as wilderness. Sierra Club repeats its earlier request that NPS review lands in this area for wilderness suitability before installing new facilities in them which would denigrate their wilderness values. 9-C

In addition to providing a definitive description of the conditions in existing Park wilderness and a thorough study of potential wilderness in the Park, it would be very helpful if NPS provided maps to aid the reviewer. There should be map(s) showing existing intrusions, including the location of heavily used rock climbing areas within Park wilderness. For wilderness potential in the 1994 addition to the Park west of Pinkham Road, the current map (Figure 3) should be revised to show any permanent human intrusions, as well as the pattern of land ownership including any recent acquisitions which have consolidated ownership into conservation status. 9-D

Finally, as raised in our earlier comments, NPS has not made the case that installation of fixed anchors within Joshua Tree wilderness is necessary for the administration of the area as wilderness. This issue must be analyzed in context with the plethora of fixed anchors in climbing routes in the Park's nearby 100,000 acre non-wilderness. 9-E

or recently proposed, see encl. "Fact Sheet, California Desert Acquisitions"

9-B – Additional information about wilderness and the Wilderness Act has been added to the description of the Wilderness Subzone on page 22. Specific information about Joshua Tree National Park's wilderness areas has been added to the Affected Environment section as suggested on pages 91 and 92

9-C –The Little San Bernardino Mountains has the greatest concentration of private lands within the Park. More than 12,478 acres in 209 parcels of privately-owned land remain in the Little San Bernardino Mountains even after the acquisition of large parcels of privately-owned land for potential donation by The Wildlands Conservancy and the anticipated transfer of state lands. Many small tracts, the subdivided fragments of the railroad land grants, lie scattered throughout the area.

Portions of wilderness unit #3 were excluded from wilderness designation in 1976 because there were several large nonfederal tracts of land when the proposal was made. The tracts have now been acquired, and *Backcountry and Wilderness Management Plan* fulfills the condition to recommend that the wilderness boundary be adjusted to include these tracts. Similar action can be taken for the Little San Bernardinos at the time that the Federal government acquires a greater percentage of the remaining non-Federal lands.

The plan does propose that 27,000 acres of the terminus of the Little San Bernardino Mountains be designated as a wilderness study area. (page 28)

9-D – A map illustrating the anchor-free zones will depict those areas of park wilderness where fixed anchors will not be allowed. See figure 8 on page 47. Land ownership maps are provided in the park's *Land Protection Plan.*

9-E –The permanent installation of bolts in wilderness may be considered an exception to the prohibition of permanent installations in wilderness if the bolts contribute to the administration of the area for the purpose of wilderness. Trails through wilderness can provide for user safety and confine impacts to defined areas as they provide access though wilderness and provide for the enjoyment of wilderness itself. Thus, the installation of bolts can provide for climber safety, limit impacts, and provide access to climbs of exceptional quality that enhance the user's ability to experience a primitive and unconfined type of climbing experience. This language has been added to the discussion of new bolts in wilderness on pages 43 and 44.

COMMENTS

REMARKS

INADEQUATE DATA RE CLIMBING & FIXED ANCHOR USE

The Supplement fails to give any definitive data on existing conditions vis a vis rock climbing and fixed anchors in the Park. For instance, as regards climbing and fixed anchors in wilderness, the Supplement simply states: "There are many climbing routes already established in the park's wilderness." This is hardly adequate data on which to base a decision.

9-F

The 1993 Joshua Tree National Monument Climbing Plan (herein incorporated by reference) provided more information on climbing than has the Supplement. More importantly, the 1993 Plan called out "Critical Resources," enumerating the concerns about each resource. It further described the resource and management objectives, noting p. 12, "The Difficult task is to determine when impacts reach an unacceptable level. In order to do this properly, baseline data must be obtained. At Joshua Tree National Monument there is a definite need for studies of the following as they pertain to climbing:" The document then lists and describes the necessary studies: plant study; wildlife study; cultural resources study; geological study; sociological study.

As part of its Action Plan, the 1993 Climbing Plan required a moratorium on fixed anchor placement in Park wilderness to "preserve resources at risk until more information is available from scheduled studies." (p.15). The Supplement has utterly failed to provide any of the information called for. We understand that the Park has undertaken a "vertical veg(etation)" study, and we commend NPS for doing so. Its results will be a vital part of revised climbing/fixed anchor impact analysis.

Until adequate information is available about current conditions, valid NEPA analysis of climbing and fixed anchor placement is impossible, and the 1993 Climbing Plan and moratorium should remain in effect. Now that the Park has finally hired a climbing ranger, NPS should enforce the moratorium. Up till now, this has not occurred. In fact, two years ago Randy Vogel, author of Joshua Tree Rock Climbing Guide and Access Fund representative, estimated that there had been "over 700 new routes put in," between 1993 and 1997, in spite of the moratorium.

There are numerous questions to be answered about current conditions, including but not limited to the following. Approximately how many bolts are there in the Park? In Park wilderness? Where are they? How many routes/bolts are redundant? What are the resource impacts and/or user conflicts? Who has provided this information? If not NPS personnel, then has this data been verified by NPS? The sine qua non of an informed judgment on the impacts of placement or replacement of fixed anchors in the Park is reliable information describing the current situation and potential impacts.

9-F – The objectives of the plan are to keep the cumulative impacts of climbing in the non-wilderness areas of the park to acceptable levels and to keep the cumulative impacts of climbing in wilderness to levels at or below 1998 conditions. The Council of Environmental Quality (CEQ) regulation (1502.2) provides for developing a plan when information is incomplete or unavailable. Additional language has been added in the introduction to the climbing management section of the plan on pages 39 and 40.

Some of the specific numbers needed to quantify 1998 conditions was unknown at the time the supplement was prepared. In 1999, however, the National Park Service initiated steps to obtain baseline information to gauge what the 1998 impact levels were. Initial surveys focus on determining the amount of land effected by social trails, identification of flora and fauna that live in the vertical ecosystems, and determining to what extent permanent fixed anchors are used in the developed zone and backcountry transition and wilderness subzones. The National Park Service is currently conducting surveys, based on stratified sampling methodology that will be used to approximate the number of bolted routes that are present within Joshua Tree National Park. Preliminary data indicates that the number of bolted routes in Joshua Tree National Park is approximately 3,475 and the number of bolts is approximately 7,128. These approximated numbers will be used as a target goal and will be used by the National Park Service and the Climbing Committee in evaluating requests for new bolted routes.

We note that Bartlett's Rock Climbs of Indian Cove (1991) documented nearly 400 fixed anchors in Indian Cove alone (pp.5, 48,49 enclosed as examples). How many are there now? Since Indian Cove is only one of many popular climbing areas in the Park, what is the tally for Hidden Valley, Jumbo Rocks, Ryan Mountain, Echo Rock, Astrodome, and all the other popular spots? NPS could do a literature search, then verify and update it for starters. 9-F

NO APPARENT INDEPENDENT NPS REVIEW

The Supplement's new climbing policy adopts virtually verbatim the policy suggested by a letter to the Park from the Access Fund, Friends of Joshua Tree, the Wilderness Society and National Parks and Conservation Association (hereinafter "Access Fund, etc."). Did NPS conduct an independent assessment of this suggested policy?

Fixed anchor free zones

Are the "fixed anchor free zones" offered by the Access Fund, etc., and reproduced in the Supplement, really proposed for their unusual "sensitivity?" A cursory review of the fixed anchor free zones listed p.31 indicates that for the most part, the proposal is to give up only areas that a) have no quality climbing rock, or b) have quite poor access.

For instance, the bulk of the Little San Bernardinos contain virtually none of the monzogranite so prized for climbing. However, one area in the range does contain good access and good quality climbing rock -- it is the portion of the range directly east of Covington Flat. We note that the Access Fund, etc. suggested (and the Supplement agreed) to make the Little San Bernardinos a fixed anchor free zone, except for "the portion of the range directly east of Covington Flat." 9-G

Of all the zones proposed by NPS to be fixed anchor free, only one, the "rock formations which form corridors along washes in the Wonderland of the Rocks from Barker Dam" appears to be good, accessible climbing rock. This area is proposed as a fixed anchor free zone because it is highly visible and therefore controversial. However, the surrounding portions of the Wonderland of Rocks are not proposed to be fixed anchor free, but are equally, if not more, sensitive from a variety of resource standpoints, including wildlife and solitude.

A surface geology map would help. NPS needs to analyze if the proposed fixed anchor free zones are indeed "areas of special value or concern, where fixed anchor placements could cause significant and lasting harm... where other resource values, such as solitude, plant and wildlife habitat, or cultural values" militate special protection (see p.31). Are they more sensitive than other areas not proposed to be fixed anchor free? Or aren't virtually all of the proposed "fixed anchor free zones" simply areas that the rock climbers do not really want?

9-G – Of the 794,000 acres in Joshua Tree National Park, 650,751 acres or 82% are designated as "Fixed Anchor Free Zones." Eighty-five percent of the wilderness subzone (498,310 acres out of 585,040 acres) is designated as anchor-free. See figure 8 on page 47. The plan also provides for review of existing bolts, which are identified by the National Park Service as infringing upon the wilderness experience of others, to be camouflaged or removed.

Baseline conditions and policy

Likewise, the Supplement adopted the Access Fund, etc. suggested baseline for allowable climbing impacts in wilderness, ie., the existing condition. However, the existing condition has yet to be determined, as noted above. Granted NPS, did add the condition "not greater than" to the suggested baseline of 1998 cumulative impacts. This is a step in the right direction, but still leaves the reviewer, and NPS, totally in the dark as to where the final baseline might end up being. 9-H

9-H – See comment 9-F.

It is remarkable to note that in proposing Alternative E for climbing, the Supplemental Plan/EIS adopted nearly verbatim the entire "compromise" language dictated by the Access Fund, etc. In essence this language assures the retention of thousands of fixed anchors Parkwide. This is a huge concession. Additionally, it provides vague conditions on placement of new fixed anchors. It is impossible to review these conditions because they are contingent on the development of information which is currently unavailable. In the interim while information is being developed there would be an undetermined amount of new fixed anchors permitted to be installed. And the sole responsibility for determining the current condition, monitoring, reporting and maintaining fixed anchors apparently rests with the climbing community, with no provision for NPS oversight. 9-I

As written, alternative E is basically business as usual for rock climbers, with an overlay of reporting and permitting, whose parameters will be based on rock-climber-generated data. This leaves the fox guarding the hen house.

9-I – See comments 9-F. 8-D – Because the National Park Service is interested in receiving recommendations and advice from the Climbing Committee on some of these issues, portions of the plan were intentionally left vague. The Climbing Committee cannot be established until a record of decision is signed, and so some of these decisions will not be made until the National Park Service receives the input of the Climbing Committee. In addition, descriptions of initial surveys to determine 1998 levels have been added throughout the climbing management section of the new proposed action (alternative E).

UNEQUAL TREATMENT

It is interesting to compare the treatment of climbers as opposed to equestrians in the Supplement. In the case of equestrian trails, the Supplement described, quantified and mapped the current condition. It found a well-recognized necessity for trails for public safety and the administration and protection of wilderness, and therefore allowed retention of certain specified trails and creation of others. No new trail requests would even be considered for several years while the existing network is monitored for impacts. We applaud this proposal as consistent with NEPA and the Organic Act. We also note that for many handicapped and elderly, horseback is the only way to experience the Park backcountry; for them it is truly an access issue.

In the case of climbing, however, the Supplement fails to describe the current condition. Nor does it find fixed anchors necessary for safety (at page 32, NPS "explicitly disclaim(s) all responsibility for safety of equipment, bolts or anchor systems in the park"). Nor does the 9-J

9-J – See comments 9-F. 8-C – A more thorough discussion of wilderness, prohibitions in wilderness, and the exceptions to those prohibitions for the administration for the purpose of the Wilderness Act has been added to the wilderness subzone section on page 22. The permanent installation of bolts in wilderness may be considered an exception to the prohibition of permanent installations in wilderness if the bolts contribute to the administration of the area for the purpose of wilderness. Trails through wilderness can provide for user safety and confine impacts to defined areas as they provide access through wilderness and provide for the enjoyment of wilderness itself. Thus, the installation of bolts can provide for climber safety, limit impacts, and provide access to climbs of exceptional quality that enhance the user's ability to experience a primitive and unconfined type of climbing experience. This language has been added to the discussion of new bolts in wilderness on page 43.

COMMENTS

Supplement establish if fixed anchors are necessary for the minimum administration of Park wilderness. In spite of these obvious omissions, the Supplement then proposes to allow climbers to create new fixed anchor climbing routes with a reporting/permitting system whose sidebars are unknown because they are to be based on information which is unavailable. The burden would be on the Park to show a given fixed anchor had unacceptable impacts to resources, but thousands of existing fixed anchors would automatically be replaced Parkwide, even on redundant routes. 9-J

In the case of climbing, it is important to note that Joshua Tree formations are such that "Top roping and clean climbing can provide protection for most climbs. The development of 'sport climbing' and the desire to lead face routes necessitates the use of bolts." (1993 Climbing Management Plan, p.7). So in this Park, climbing from point A to point B is generally not contingent on fixed anchor placement; installing fixed anchors is more often a question of variation and novelty. For climbers in Joshua Tree, fixed anchor placement is not an access issue; it's a recreation issue.

The inescapable conclusion reached by comparing the creation of new bolted climbing routes in Joshua Tree with the creation of new equestrian trails is that the Supplement sets a double, and lesser, standard when it comes to climbers. 9-K

SAFETY/LIABILITY

In its fixed anchor policy, the Supplement sends mixed messages. At page 30, the document provides that new fixed anchors may be placed "to address climber safety issues." Then, at page 32, the Supplement devotes a paragraph to disclaiming any liability for fixed anchors/ climber safety. It appears that the Park will be delegating the placement, monitoring and maintenance of fixed anchors to some other entity. We understand that entity may be a local climbing group called "Friends of Joshua Tree." 9-L

Delegating the responsibility for these tasks creates certain legal and practical issues. What is the qualification of the delegee? Can this entity be construed to be the agent of the Park? What legal and financial responsibility has the delegee/agent demonstrated in the event they are negligent in their duties? Public safety and NPS financial liability mandate these questions be answered.

A final note. If "climber safety issues" is a criterion for placement of new fixed anchors, why is it not a criterion for replacement/retention of existing fixed anchors? What are the conditions precedent to finding a "safety issue," and why aren't they defined so the public can review them? 9-M

REMARKS

9-K – Comment noted.

9-L – The National Park Service recognizes that a portion of its mission is to provide for visitor use and that that use may also be potentially hazardous. The recreational activities of some visitors may be of an especially high-risk, high-adventure type and may pose a significant personal risk to participants. Park visitors must also recognize this, and they must assume a certain degree of risk and responsibility for their own safety when visiting areas that are managed and maintained as natural, cultural, and recreational environments. The very nature of climbing requires participants to assume responsibility for their safety. Neither the National Park Service nor any other organization, including the Friends of Joshua Tree, assumes the responsibility for placing, monitoring, or maintaining fixed anchors.

9-M – The sentence regarding replacement of existing bolts has been modified to read, "Existing bolts that are deemed to be unsafe by climbers can be replaced on a piece-by-piece basis without a permit within the park's developed zone and the backcountry transition and wilderness subzones." (page 41) As stated above, safety is the discretion of the individual climber. The National Park Service relies upon the integrity of climbers to make the determination of a fixed anchor's safety. Because of the effort required to replace a fixed anchor by hand in wilderness and by power driill (by permit only) in the developed zone and backcountry transition subzone, the National Park Service does not anticipate an abuse of this privilege.

COMMENTS

Ernest Quintana, Superintendent
January 19, 1999
Page 7

POTENTIAL AREAS OF AGREEMENT

Clearly, the Supplement is legally invalid and NEPA insufficient. One would hope, however, that there are certain areas of agreement among Sierra Club, NPS, and other responsible users of Joshua Tree National Park that could help resolve issues in the future. We would hope that areas of common agreement would include the following

9-N

We all agree that non-impairing recreation is a legitimate use of park lands. We all agree that rock climbing is a legitimate use of the Park. We disagree when recreational use of the Park impairs its resources and reason for being.

We all agree that the Park Service may plan for and install trails, or even authorize others to install trails on its behalf. We do not agree when recreationalists plan and install permanent trails (horizontal or vertical) for the Park. This is the sole right and responsibility of the Park Service, subject to full NEPA review.

9-O

WILDERNESS DAY USE LIMITS

The Supplement fails to analyze group size limits for day use in Park wilderness. The only group size limits proposed are for overnight use. Intense day use has an affect not only on wilderness experience, but on sensitive wildlife. The Park's two most sensitive species, desert bighorn and desert tortoise, both primarily occupy Park wilderness, and both are diurnal.

It is customary for wilderness plans to set day use group size limits; this is necessary and appropriate to protect Joshua Tree resources.

9-P

CLIMBING COMMITTEE

We object to the Supplement's proposal for a revised climbing committee. The proposal is vague as regards compliance with FACA (see 7/98 Sierra Club letter). Furthermore, its composition does not provide any assurance that protection of Park resources will receive proper consideration. The advisory committee outlined in the original Draft would have the appropriate expertise in a range of affected resources to better advise the Park in this regard, and it would include a climbing representative as well.

9-Q

REMARKS

9-N – Comment noted.

9-O – Comment noted.

9-P –The National Park Service is directed to monitor recreational activities and assess their potential impacts on park resources. At this time, the park supports regulation of day use through passive means, i.e., control restrictions on roadside parking, pullouts, and vehicle parking areas. The National Park Service will continue to monitor day use and its impacts upon wilderness values and biological resources. If potential for adverse impacts begins to become apparent, the National Park Service will initiate an appropriate policy or regulations response to prohibit or control the activity and avoid the adverse impacts. The National Park Service remains committed to preventing degradation to resources, an adverse impact on wildlife, or diminishment of other visitors' enjoyment from occurring. The new proposed actions provide for the Superintendent to retain the discretion to monitor day use and to establish group size limits for day use. See page 46.

9-Q – The Climbing Committee section of the plan has been modified to ensure compliance with the Federal Advisory Commissions Act (FACA). The Charter of the Joshua Tree National Park Advisory Commission provides for the creation of subcommittes from among its membership and supplemented, when appropriate, by members of the public. The Chairman, subject to the concurrence of the Designated Federal Officer (the park Superintendent) will determine membership of the subcommittee.

A sitting member of the Advisory Commission will chair the committee. The Commission would select committee members from applicants from the climbing community, conservation organizations, and other interested individuals. All meetings of the committee will be announced and will be open to the public. The Climbing Committee will gather information and conduct research for the Commission and make recommendations to the Advisory Commission, which will, in turn, provide a recommendation to the Superintendent. Again, all meetings will be announced and open to the public according to policy. The Superintendent remains the ultimate decision-making authority. (page 41)

COMMENTS

HABITAT MANIPULATION

The new language at page 36 regarding the retention of artificial water sources in the Park creates a conflict with NPS policy governing same. It should read "if the water source supports wildlife and (delete "or") does replace a natural source ...". This should not be an "either...or" analysis, but rather a "both...and" analysis.

9-R

PUBLIC COMMENTS

In describing public comment on the original Draft, the Supplement states page two: "In addition to the public comments, the Joshua Tree National park Advisory Commission met several times to discuss the Draft GMPS/EIS." In this regard, please refer to our 7/98 letter and the ~~Hi Desert Star~~ Desert Trail 7/98 editorial (enclosed), both of which appropriately criticize NPS for holding unnoticed meetings to which climbing groups and only certain environmental groups were included, to the exclusion of others. NPS's decision to propose its new, more permissive, climbing policy very likely came about as a result of these private meetings.

29 Palms

9-S

CONCLUSION

To address the severe deficiencies of the current Supplement, the Desert Committee of Sierra Club requests the preparation and circulation of a Revised Supplemental Draft Plan/EIS. The NPS has a duty to conduct the same timely, comprehensive review of its proposed policies and actions that it expects from others.

9-T

Very truly yours,

Elden Hughes,
Chairman

Joan Taylor,
Vice Chairman

Enclosures

REMARKS

9-R – Language has been changed. Please refer to the Artificial Water Sources section of the plan on pages 49 and 50.

9-S – Notice of all meetings of the Joshua Tree National Park Advisory Commission was published in the *Federal Register* and received widespread local notification through press releases. All regular commission meetings were open to the public. Members of the park staff met with the co-signers of the "Joint Proposal" upon the advice of the Advisory Commission to receive clarification on a few issues discussed in the "Joint Proposal."

9-T – Request noted. The National Park Service has fulfilled its requirements under the National Environmental Policy Act for public review and comment of the proposed *Backcountry and Wilderness Management Plan.*

COMMENTS

Fact Sheet
California Desert Acquisitions

1/20/99

THE PROPOSAL:

A proposal to acquire 487,000 acres in the California Desert to be managed and protected by the Bureau of Land Management (BLM) and the National Park Service (NPS) with more than $61.5 million in Federal and private funds has been endorsed by the President in his "Lands Legacy Initiative" announced January 12.

The Federal share of $36 million will be requested from the Land and Water Conservation Fund (LWCF) in the President's upcoming 2000 budget request. At least $25.5 million in private lands and funds are being donated by The Wildlands Conservancy, (TWC), a non-profit group, based in Oak Glen, CA. The lands to be acquired are spread throughout the Desert and include lands held by Catellus Corp., owner of alternate sections of land once owned by the railroads, and numerous private individuals.

BACKGROUND:

The Department of the Interior is required by the California Desert Protection Act to give priority to consolidating Federal ownership within the park units and wilderness areas designated by the Act. A proposal by TWC to help accelerate this process has been included in the President's "Lands Legacy Initiative," to be part of the Administration's 2000 budget request to Congress.

DETAILS OF THE PROPOSAL:

TWC has been very active in recent years in acquiring key private inholdings in the California Desert region. The new proposal announced 12/2/98 and further refined in a 1/8/99 letter of intent, signed by TWC, Catellus, and the BLM, involves the following:

TWC, utilizing private funds, will contribute at least $25.5 million (approximately $20.5 million in cash and $5 million in donated land) to be matched by $36 million from the LWCF requested by the President from Congress.

With this $61.5 million, 487,000 acres will be acquired as follows:

437,000 acres of Catellus lands to be acquired by TWC and the Department with private and Federal funds in San Bernardino and Riverside counties for $54 million or about $125 per acre and transferred to BLM and NPS;

24,000 acres in small parcels to be acquired by TWC from willing sellers with private funds, including approximately 20,000 acres for $2 million in Joshua Tree National Park and approximately 4,000 acres for $500,000 in Mojave National Preserve, and donated to NPS; and

26,000 acres of private inholdings valued at $5 million already acquired by TWC with private funds and donated to BLM and NPS, mostly in Riverside County.

THE PROPOSAL (continued):

In addition, separate from this proposal, BLM has promised to continue ongoing efforts with Catellus to exchange, for fair market value, up to an estimated 65,000 acres of Catellus checkerboard inholdings for an equal value of BLM property in other parts of the Desert no longer needed in public ownership.

LOCATION OF LANDS TO BE ACQUIRED:

The 487,000 acres includes inholdings owned by Catellus, other private owners, and TWC in the following areas:

90,000 acres in the Mojave National ~~Preserve (San Bernardino County);~~

40,000 acres in Joshua Tree National Park (Riverside and San Bernardino counties); and

357,000 acres in BLM Wilderness Areas, critical desert tortoise habitat, recreation areas, public access routes, and wildlife corridors (mostly in San Bernardino County, with a small portion in Riverside County).

IMPORTANCE OF PROPOSAL/SUPPORT:

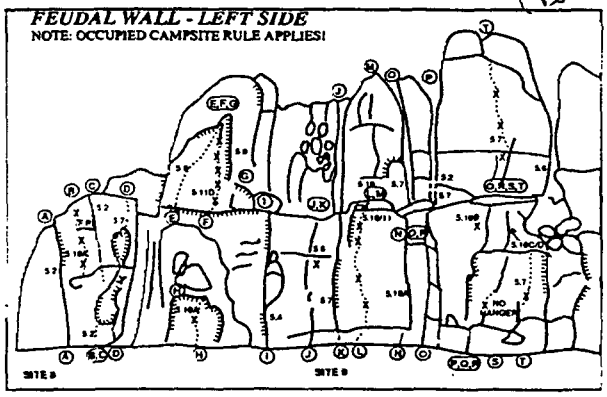
This proposal is being billed in the press "as the biggest land acquisition in California history" and "one of the most substantial private land gifts to the American people" ever made. The lands to be acquired fill critical gaps in wilderness areas, parks, wildlife habitat, and recreation areas within the Desert. Acquisition of these lands will consolidate Federal ownership for public use and enjoyment as well as setting aside substantial acreages for the threatened desert tortoise and other wildlife so planned growth in other parts of these counties can continue with fewer restrictions.

The President has announced his intention to request the $36 million in the Administration's 2000 budget as part of his "Lands Legacy Initiative." The California Desert is a priority acquisition target area for both BLM and NPS and agency field officials strongly support the proposal. Senator Dianne Feinstein sent a letter to the President 12/10/98 expressing her strong support. Sen. Feinstein sits on the Senate's Appropriations Subcommittee for Interior and Related Agencies.

These funds would be in addition to $3 million recently announced jointly by the President and the Congress to acquire lands within BLM Wilderness Areas from small inholders in the California Desert, appropriated at part of the 1998 Federal budget.

fact sheet prepared by BLM 1/19/99. for information contact (916) 978-4610

Rock Climbs of Indian Cove (Bartlett)



S Not Just Another Pretty Face 5.10c/d PG * Start atop a ledge 5' right of Marchesa. Climb past a hangerless bolt, then follow a seam to the ledge. The protection is better than it looks. FA: Bill (from Colorado), Todd Trautner and Robert Alexander, November 1986.

T Crown Jewels 5.7 PG * Start 10' right of Not Just... and climb past a bolt, then up loose black rock to the ledge. Climb up cracks above the ledge, then past three bolts to the top. FA: unknown.

FEUDAL WALL—RIGHT SIDE

A Dum Roodle 5.6 Climb the break just right of Crown Jewels, passing over some chockstones. From the ledge, move up and left, then back right and ascend shallow double cracks leading into a chimney system. Starting the second pitch directly is 5.9. FA: unknown.

B Castles Burning 5.12a * Climb the brown face right of the second pitch of Dum Roodle past five bolts and several bulges. Watch out for rope drag. FA: Bob Gaines, January 1988.

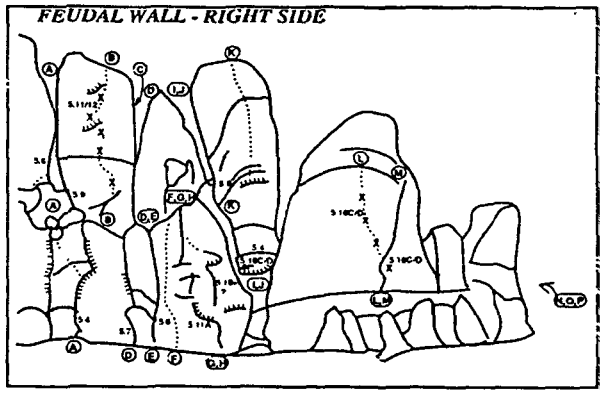
C No Fire At All 5.10a Right and around the corner from Castles Burning is this two-bolt climb. From the second bolt, move right into a crack. FA: Mark Maynard, June 1989.

D Princess 5.7 Climb the flake 10' right of Dum Roodle. Continue up to the ledge, then up the easy gully above. FA: Chris Gonzalez and Rey Creed, February 1974.

E The Mikado 5.6 ** This is the nice thin crack 5' right of Princess. It joins Princess at the ledge. FA: unknown.

F Socrates Sucks 5.10c (TR) The face just right of The Mikado. FA: unknown.

G California Crack 5.11a R * Start 15' right and around the corner from The Mikado and climb up and left around a roof. Continue up cracks past a bush to ledges. A bold lead; usually toproped. FA: Don O'Kelley and Dave Davis, April 1969. FFA: unknown, 1979



H Arizona Crack 5.10+ (?) R (?) Start on California Crack, but go right around the roof, then up, passing another small roof. Little is known about this route. FA: unknown.

I El Rey 5.10c/d PG/R * Just right of California Crack, scramble up a gully to a roof. Struggle up through the slot on the left side of the roof to very easy terrain above. FA: Chris Gonzalez, September 1976.

J Minion 5.4 Turn the roof of El Rey on its right, then move back left above it in a horizontal crack to reach the easy terrain. FA: Chris Gonzalez et al, March 1974.

K Cuban Connection 5.8 PG/R Near the start of the easy terrain above the El Rey/Minion roof, traverse out right in a horizontally right-slanting crack (the lowest of several possibilities) to a horn/flake on the skyline. Continue up the buttress above. Poor rock. It is likely that the upper possibilities have also been climbed. FA: Chris Gonzalez and Jim Nagas, March 1974.

L Pet or Meat 5.10c/d ** 30' right of the start of El Rey (on a separate part of the Feudal Wall) is this steep, popular four-bolt route. The first bolt is actually part of the following route. FA: Todd Gordon, Bob Gaines, Cyndie Bransford and Steve McAllister, January 1990.

M Trautner-Fry 5.10c/d R (?) Clip the first bolt of Pet or Meat (this route, actually) and continue up and right in a slanting crack. FA: Trautner and Fry.

N Panther Crack 5.10d/5.11a PG ** 50' right and around the corner from Pet or Meat is this overhanging thin/hand crack that doesn't quite reach the ground. FA: Jon Lonne and Herb Laegar, January 1976.

O Dry Lake 5.10a/b PG/R Start 25' right of Panther Crack and climb a left-facing lieback crack to face past two bolts and a dubious fixed pin. FA: Tom Atherton and Todd Gordon, November 1989.

P Noriega Does Panama 5.9/10a 30' right of Dry Lake is this three-bolt climb. FA: Bob Gaines, Yvonne MacPherson, Cyndie Bransford and Todd Gordon, January 1990.

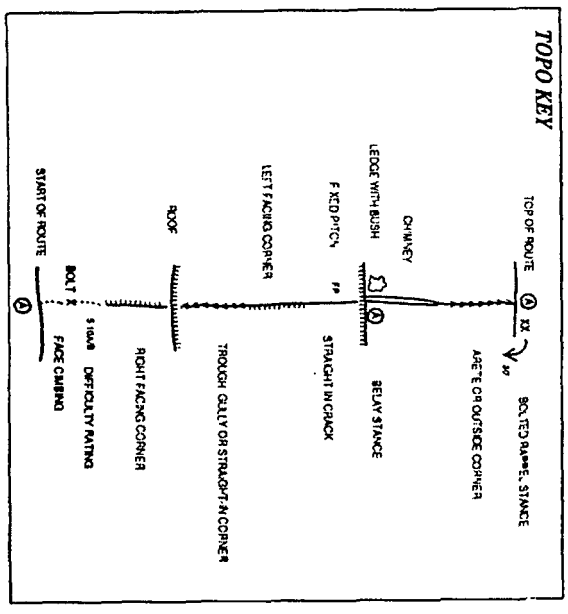
COMMENTS

COMMENTS

OK Climbs Cove. Indian (Bartlett)

RATINGS: Having worked in a local climbing shop for the last year, I've become aware that many climbers visiting Joshua Tree from other areas complain that the ratings here are "stiff", that is, these routes are underrated compared to routes in areas they might be more familiar with. I'm not willing to admit that I think that Joshua Tree (like all climbing areas) takes a little getting used to in order to climb at your fullest potential. One thing I will admit about the ratings, however, is a certain amount of inconsistency with them. This is caused by a number of factors, such as who first climbed the route and rated it, when it was first done and with what equipment, etc.

I have tried to alleviate these problems somewhat by changing some of the ratings, and being more liberal in the use of combination ratings (i.e. 5.10a/b, 5.7/8). Most routes 5.10 and above will have a subdivision letter (a,b,c,d, or some combination thereof), but some will not, and others may just use a plus (+) to indicate the higher side of a given rating. So what's the difference between 5.10+ and 5.10d? Most likely, the person giving their route a 5.10+ rating simply refuses to define it more than that, given the wide array of factors that come into play (a climber's height, size of their hands, type of rubber on their shoes, etc.). Is 5.10+ harder than 5.10d? I don't know. You'll have to climb both routes and decide for yourself. One thing to keep in mind when dealing with the ratings in Indian Cove (or any climbing area, for that matter), is that a rating is just an approximation of the difficulty. It is not meant to be an absolute, and, indeed, it is not even possible for it to be so.



Opinion

Meeting fiasco should never have happened

After last week's fiasco over Joshua Tree National Park's meeting with representatives of groups interested in rock bolts, we can see why government leaves a bad taste in people's mouths.

The Desert Trail and members of the public were barred from the meeting, which focused on General Plan verbiage being recommended on the bolt issue. We were barred on meeting day by Superintendent Ernest Quintana after being told the week before by JTNP Assistant Superintendent Mary Risser that the public could attend.

"There just wasn't enough room and they were afraid that people wouldn't understand it was a working committee meeting not a public hearing," Quintana told reporter Deborah O'Connor.

Quintana apparently never communicated to his staff that the meeting wasn't going to be open to the public, but that's no excuse.

The meeting should have been open, and park staff was wrong in telling the people who were turned away that the newspaper got it wrong in our initial story. We asked the question, "is the meeting open to the public?" and Risser responded, "I don't see why not."

After the story printed, park staff waffled when we said we planned to attend, but never once did Quintana say that Risser had been mistaken, that it really wasn't open. JTNP had from Thursday to Tuesday to correct us.

Instead, at last minute, the public was turned away, with the excuse above offered.

No wonder the American public harbors deep distrust of government.

We were told by Gary Daigneault, himself a radio newsman who chairs the Joshua Tree National Park Advisory Commission and attended the meeting, that it wasn't newsworthy.

We think it should have been up to us to decide that for ourselves. The meeting lasted 3 1/2 hours and caused one participant to miss his flight to Northern California. We don't call that "nothing."

Do we think Ernest Quintana is hiding something? Not really, but we are disappointed in how he handled this situation. Good communication between the superintendent, his employees and the press would have alleviated any problems.

In the future, we hope JTNP can be more clear at the outset when it comes to who can and cannot attend working meetings, and that instead of claiming the press got it wrong, park staff own up when they create the problem.

That way, everyone wins.

29 Palms
Desert Trail
July 16, 1998

CNRCC DESERT COMMITTEE

7/28/98

Ernest Quintana
Superintendent
Joshua Tree National Park
Park Blvd
Twentynine Palms, CA 92277

JA

BY FAX TRANSMISSION

Re: Draft Summary of Changes from the Proposed Alternative for Climbing

Dear Superintendent Quintana:

I am writing on behalf of the Desert Committee of the Southern California/Nevada Regional Conservation Committee of the Sierra Club. We are in receipt of the Draft Summary of Changes from the Proposed Alternative for climbing for the Joshua Tree National Park Backcountry and Wilderness Management Plan (hereinafter "Draft Revision "). Per our discussion, the Desert Committee would like to offer comment on this document.

As background to this situation, I had called you recently to inquire about a "consensus" I heard was being developed with regard to the management of climbing in Joshua Tree National Park. You responded that the NPS had been meeting with staff for the Access Fund, Wilderness Society , National Parks and Conservation Association and Friends of Joshua Tree and that, although the Park had agreed to most of the changes requested in their comments to the Draft Backcountry and Wilderness Management Plan, they were still not satisfied. I requested to come to the next meeting and you welcomed my participation. Subsequently, you phoned to say that the other participants did not want my presence, and I agreed not to come. Later this was confirmed by a phone call from one of the participants, who said I could meet with some of them on the appointed day, but that the group would then postpone its intended meeting with NPS to another time.

Thereafter I phoned you to request a status report as to what had happened, and you faxed me the latest Draft Revision for climbing referred to in this letter.

In short, the Desert Committee objects to the Draft Revision for climbing, both procedurally and substantively. Although the attempt to avoid conflict may have been well intended, the process excluded public participation and National Environmental Policy Act (NEPA) review. Moreover, the Draft Revision, if adopted, violates federal law in several respects, including but not limited to the following.

Administrative Procedures Act (APA)

The NPS crafted the Draft Revision to the Backcountry and Wilderness Plan in a less than open and fair manner. The proposed Backcountry and Wilderness Plan is a "rule" as defined by the APA. The APA states that a "rule" is an "agency statement of general or particular applicability and future effect designed to implement...law or policy..." The provisions of the APA govern NPS management of public comment and Plan revision.

Such was not the case with the Draft Revision for climbing. This revision was not even composed by the NPS. Special interest groups and their allies composed most of the substantive elements of this Draft Revision. The authors of this revision, for the most part paid lobbyists, met at the informal invitation of the NPS management and met at least twice in private with the Park superintendent. When a representative of an opposing point of view sought inclusion in such meetings, that person was excluded. While the NPS would have permitted such attendance, the special interests demanded otherwise and the NPS acquiesced in that demand.

Thus "off-the-record" and "backroom"deliberations outside of the rulemaking record may produce the climbing language of the final Joshua Tree Plan. Such a process likely constitutes ex parte communications . But even if the NPS shuns this hard approach to ex parte communications, then at the least the NPS should have taken steps to ensure openness, full disclosure and public participation in the process. Instead, the NPS made no public notice, no provisions for public participation and may not possess a summary of the ex parte contacts in a file available to the public.

Far more disturbing is that the ex parte communications with the special interests occurred in meetings after the NPS closed the public comment period in February, 1998. If the NPS believed that oral communications were necessary, the meetings should have been properly noticed and all persons who have expressed an interest in the proceeding should have been invited and allowed to participate. This did not occur. The NPS conduct did not serve the purpose of openness and inclusivity, but turned the process of agency decision-making over to a handful of persons while the public was shut out of the debate.

2. National Environmental Policy Act (NEPA)

The Draft Revision for climbing proposes that the NPS will authorize replacement of existing fixed anchors without permit for the wilderness and non-wilderness areas of Joshua Tree National Park, excepting only those "bolts...identified... as infringing on the wilderness experience ...or character." It would also authorize the installation of new fixed anchor routes under permit within wilderness and without permit in non-wilderness, where it would require only that climbers report the intent to place new bolts. Such actions constitute Federal actions significantly affecting the quality of the human environment in the meaning of NEPA. The Draft Revision, if

implemented as proposed, violates NEPA.

The DEIS that accompanied the Draft Backcountry and Wilderness Plan originally proposed to require permits for the installation of new fixed anchors in non-wilderness and it proposed to prohibit all new fixed anchors in wilderness. Since the latter proposal was made as an interpretation of law (the Wilderness Act), the accompanying Draft Environmental Impact Statement (DEIS) did not assess the impacts of placement or replacement of fixed anchors in Joshua Tree wilderness. If the DEIS had done such an analysis, the NPS could argue that the DEIS would have provided an umbrella under which it could issue permits for new wilderness climbing routes without further environmental assessment. This is clearly not the case. Nor did the DEIS assess the impacts of fixed anchors or describe the affected environment adequately for this purpose.

As articulated in Sierra Club comments on the Draft Backcountry and Wilderness Plan, the DEIS failed to adequately describe the affected environment, in particular the unusually pristine character of Joshua Tree wilderness. The DEIS also failed to adequately analyze all aspects of fixed anchors in Joshua Tree, including but not limited to: existing quantity; direct, indirect, long-term and cumulative impacts; need for fixed anchors in wilderness and non-wilderness; and a full range of mitigation measures.

Adoption of the Draft Revision for climbing will require a new environmental analysis, yet there is no mention of whether the NPS will conduct any environmental compliance before adopting it. Certainly, the NPS could not categorically exclude from NEPA scrutiny such an action as the issuance of permits for installation of fixed anchors in Park wilderness, which has highly controversial environmental effects and thus qualifies as an exception to categorical exclusions. Nor can the NPS issue piecemeal environmental assessments for each climbing route. Such behavior would ignore the cumulative impacts of multiple permits issued over an extended period.

In this regard, the Draft Revision simply states that in permitting new climbing routes within wilderness: "Information from pertinent surveys, studies and resource evaluations will be considered in the approval process. New routes should always reflect the commitment to keep the cumulative impacts of climbing in wilderness to levels at or below 1998 conditions." However, deferring the data gathering, analysis, and public review to a future time fails to satisfy NEPA.

3. The Organic Act of the NPS

The Draft Revision language begins with the phrase "For the Preservation and Public Enjoyment of Joshua Tree National Park." It then describes climbing as an appropriate form of recreation for national parks. We do not dispute that climbing is an appropriate form of outdoor recreation and a legitimate form of park enjoyment. However, the Draft Revision language skews the clear

meaning of the Organic Act.

The Organic Act mandates that the NPS shall regulate the use of national parks to conserve their resources and then to "provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." Enjoyment that impairs park resources is not authorized by the Organic Act.. It is admittedly debatable whether the placement of one fixed anchor for climbing constitutes "impairment." However, there should be no debate about whether placement of thousands of fixed anchors in thousands of routes (as is the case in Joshua Tree) constitutes "impairment." It clearly does.

Joshua Tree National Park is not simply an entertainment venue, like a theme park, in which all forms of enjoyment are allowed. Some forms of enjoyment can harm park resources and are inappropriate. Climbing is a valid and genuine form of enjoyment for a minority of park users, but let's be clear: climbing is not the purpose of the Park before which all other values must be subordinated. In fact, the reverse is true; climbing is subordinate to preserving park resources unimpaired. This the Draft Revision fails to recognize.

4. Federal Advisory Committee Act (FACA)

In 1976, Congress enacted a statute that generally limits Federal agencies from establishing advisory committees such as the "climbing committee" prescribed in the Draft Revision for climbing. FACA defines an "advisory committee" as a panel, task force or any other similar group established or utilized by a Federal agency for the purpose of obtaining "advice" or "recommendations." The Draft Revision language proposes what is indisputably an "advisory committee" for climbing.

FACA authorizes Federal agencies to establish advisory committees only after meeting several requirements. These include consultation with the General Services Administration and preparation of a charter for approval by the Secretary of the Interior. The Draft Revision does not mention FACA. Unless its requirements are met, the creation and the meetings of such a committee will violate Federal law.

The original Draft Plan called for an advisory committee composed of members of the current Joshua Tree advisory committee. This existing committee is duly authorized under FACA, and it is appropriately structured to advise the Park. Climbing has a voice on this committee as one Park user among other users – each of whom has an equal right to be heard.

5. Wilderness Act

The Draft Revision for climbing seems to rest on the notion that the NPS cannot preclude bolting in its wilderness unless studies produce some magic bullet. First , there is no such magic bullet

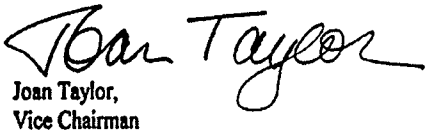
that substitutes for agency decision-making. Second, even if we follow the logic that studies must be done before taking any action on wilderness fixed anchors, then let the Park first conduct the studies and then decide whether to permit bolting in its wilderness. The primary axiom in first aid, "first, do no harm," is quite applicable here.

We can debate over the letter of the Wilderness Act. But, once we cut through all of the debate, can anyone seriously state that the thousands of fixed anchors in rock faces in Joshua Tree's wilderness actually enhance wilderness values? We see the Draft Revision language under New Bolts (Within Wilderness) referring to "the potential for increasingly unacceptable levels of resource impacts and social conflicts." Then the Draft Revision proposes "to keep the cumulative impacts... to levels at or below 1998 conditions," but utterly fails to give the public any quantifiable notion of what these cumulative impacts are, nor how much these already "unacceptable" impacts are proposed to be reduced. Moreover, the Park has yet to make the case that fixed anchor placement is justified at all within Joshua Tree wilderness, in view of the thousands of additional fixed anchors already installed in the Park's nearby 100,000 acre non-wilderness areas.

The Draft Backcountry and Wilderness Plan originally argued that the permanent installation of fixed metal anchors detracts from a wilderness where man is a visitor who does not remain and whose modern artifacts are rarely evident. The US Forest Service has similarly concluded. If the Park now wishes to depart from this stance, then the Wilderness Act (and other Federal law cited herein) cry out for a careful assessment of appropriateness of and need for fixed anchors within Joshua Tree's uniquely pristine wilderness.

In conclusion, however well-intended it may have been, Sierra Club vehemently objects to the Draft Revision for climbing in Joshua Tree National Park. Not only does it fail to protect the resources of Joshua Tree National Park, but also it was produced without public participation. We request recirculation of a revised Draft Backcountry and Wilderness Management Plan and revised DEIS, should NPS propose to adopt this radical change to its Backcountry and Wilderness Plan.

Very truly yours,



Joan Taylor,
Vice Chairman
1800 S. Sunrise Way
Palm Springs, CA 92264

cc: John Reynolds

COMMENTS

REMARKS

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Sierra Club
San Gorgonio Chapter

Serving Riverside and San Bernardino Counties
Tahquitz Group • Los Serranos Group
San Bernardino Mtns. Group • Mojave Group
Moreno Valley Group

568 N. Mountain View Ave., Suite 130
San Bernardino, CA 92401
(909) 381-5016

February 27, 1998

FEB 1998

Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

BY FAX TRANSMISSION WITH HARDCOPY MAILED

Re: Comments on Backcountry and Wilderness Mgt Plan

Dear Superintendent Quintana:

This letter is written on behalf of the Tahquitz Group and the San Gorgonio Chapter of the Sierra Club, the group and chapter within whose boundaries Joshua Tree National Park ("the Park") lies.

ROCK CLIMBING MANAGEMENT

We feel that rock climbing is appropriate and should be allowed throughout the Park. However, the proliferation of fixed anchors in the Park is detrimental, particularly to its wilderness areas. The thousands of fixed anchors for rockclimbing throughout the Park indicate that there is now an overabundance of these fixtures. The vast majority of fixed anchors are located adjacent to campgrounds and roads and not in wilderness, and would not be affected by the proposed management alternative.

9-U

The San Gorgonio Chapter of the Sierra Club supports the Park's preferred alternative of allowing the replacement of bolts in nonwilderness only on an as needed basis, the requirement of a permit for bolts for installation of bolts in nonwilderness, and a prohibition on bolts in the Park's wilderness.

The Sierra Club recognizes that, in contrast to many other wildernesses, the Park's wilderness areas are truly in a primeval state -- with virtually no evidence of human intrusion, no constructed trails, bridges and the like. Aboriginal trails and artifacts and isolated remnants of historic ranching and mining are virtually the only reminders that man has touched this land.

9-V

Wilderness is an irreplaceable and diminishing resource. We should take a stand in favor of retaining the pristine wilderness that exists. We support the preferred alternative.

Printed on Recycled Paper. ... To explore, enjoy and preserve the nation's forests, waters, wildlife, and wilderness ...

9-U – Comments noted.

9-V – An additional description of the park's wilderness has been added to the Affected Environment section. See pages 91 and 92.

COMMENTS

REMARKS

In this regard, we feel that the Backcountry and Wilderness Management Plan (hereinafter "the Plan") is deficient in that it fails to adequately describe the current condition of the Park's wilderness. The Plan should be revised to describe the general condition of the wildeness areas of the Park; this is essential in order to lay the foundation for the proposed management actions in wilderness. In comparison to many wilderness areas in the nation, the Park's wilderness is quite pristine, and it is the Park's obligation to protect this condition from modern day permanent human intrusions.

TRAILS

In the same vein as above, we urge the Park NOT to allow construction of new trails in wilderness. The Park has a duty to preserve the primeval quality of the wilderness experience available today in the JTNP for the enjoyment of future generations. Please see the above comments under Climbing Management. The same principle applies. 9-W

9-W – The Wilderness Act recognizes recreation as an appropriate use of wilderness in a manner consistent with the underlying purposes of wilderness – maintaining naturalness and providing opportunities for solitude. Primitive and unconfined types of recreation may require the construction or maintenance of minimum facilities, such as trails. Trails provides access to and within wilderness serve the transportation needs of visitors and administrative personnel and are often a key tool to keep visitor use within the capacity of the wilderness. The location and type of trails are important factors in influencing the number of visitors and in dispersing use to reduce environmental impacts and social impacts to visitors themselves. Trails are acceptable in a wilderness when they are constructed for these purposes.

The National Park Service also recognizes a benefit of leaving large portion of a wilderness area free of trails. An examination of Figure 6 on page 34 Joshua Tree National Park Trails and Corridors reveals that the vast majority of the park has no proposed trails.

NEW WILDERNESS AREAS/ WSAs

We support the proposed wilderness designations for lands newly incorporated into the Park as part of the Calif Desert Protection Act. However, we feel that the new southerly additions not proposed for wilderness should be made Wilderness Study Areas (WSAs). These additions do contain substantial private inholdings; however, we assume that it is the Park's intention to try to acquire this land. The designation of WSA would be an appropriate designation so that the wilderness values of the area will be intact for eventual wilderness designation. 9-X

9-X – Refer to comment 9-C.

AUTO CAMPING

We support the proposed policy of auto camping only in designated campgrounds. 9-Y

9-Y – Comment noted.

ARTIFICIAL WATER SOURCES

We support the proposed policy of removing dysfunctional water sources (assuming they are not historic artifacts). We also concur with the plan to analyze the functional water sources to ensure they meet the provisions governing wilderness. But, if the goal is to avoid disruption of wildlife populations, the Park should gather information on past, present, and probable future water table levels to determine if wildlife are or will be deprived of water sources which were available in pre-Columbian time in the area. This should be part of the analysis regarding the retention of artificial water sources. 9-Z

9-Z – Comments noted.

COMMENTS		REMARKS
9-N GROUP SIZES We support the Park's proposed alternative of limiting group sizes in the various zones.	9-AA	9-AA – Comment noted.
CLOSURES We support the existing and proposed closures of specified areas in the Park for wildlife protection.	9-BB	9-BB – Comment noted.
DESERT TORTOISE RECOVERY We support the adoption of the recommendations of the Desert Tortoise Recovery Plan.	9-CC	9-CC– Comment noted.
Thank you for the opportunity to comment. Very truly yours, Peter Kiriakos (jt) Peter Kiriakos, Chapter Conservation Chairman Joan Taylor Joan Taylor, Tahquitz Conservation Chairman		

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Sierra Club

TAHQUITZ GROUP
P.O. Box 1122
Rancho Mirage, CA 92270

February 27, 1998

Superintendent Quintana
Joshua Tree National Park Drive
74485 National Park
29 Palms, CA 92277

BY FAX TRANSMISSION WITH HARDCOPY MAILED

Re: Additional comments on Backcountry Plan

Dear Superintendent Quintana:

The following comments are from the Tahquitz Group of the Sierra Club, in addition to our comments in our joint letter with the San Gorgonio Chapter.

OVERNIGHT REGISTRATION

The Tahquitz Group has repeatedly raised our objections to a requirement for backcountry registration for hiking into the Park from the Coachella Valley. We have repeatedly been assured that hikers and backpackers entering the Park from the Coachella Valley would not be required to register. However, it appears that registration at a Park backcountry board is proposed to be a requirement for overnight hiking. Since there are no Park backcountry boards in the Coachella the Valley, this would require a minimum two hour round trip to register. This requirement is overly burdensome for the many who enter the Park this way. We suggest that the requirement be deleted or that there be at least two locations, available 7 days a week (such as fire stations) where backpackers from either end of the Valley could conveniently register for overnight travel in the Park. 9-DD

Thank you for the opportunity to comment.

Very truly yours,

Joan Taylor

Joan Taylor,
Conservation Chairman

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

9-DD – Both the new proposed action (alternative E) and the old proposed action (alternative A) provided for obtaining a permit from a ranger, a ranger station, and at visitor centers. Permits could also be requested by telephoning a ranger station or visitor center. The exception to parking at a backcountry registration board exists for those entering remote areas, such as the eastern Pinto Basin and the Coxcomb, Pinto, Eagle, Little San Bernardino, and Cottonwood mountains. See pages 31 and 32.

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(Comment Letter Received by Fax From the Sierra Club California/Nevada Regional Conservation Desert Committee on 3/2/99. Document retyped because letter was unreadable when scanned onto the computer.)

14045 Honeysuckle Lane
Whittier, CA 90604

February 28, 1998

Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Comments on Backcountry Plan

The following was adopted 2/297 and reaffirmed 12/7/97:

The California/Nevada Desert Committee of the Sierra Club supports the policy of no placement or replacement of fixed climbing aids (climbing bolts) in Joshua Tree National Park Wilderness and supports the review under an approved management plan of all bolted routes throughout the Park for either removal or retention.

It is the recommendation of the Desert Committee that the additions in the Little San Bernardino Mountains be considered for wilderness designation. It is understood that the inholdings in these lands are being blocked up. 9-CC

9-CC – Please refer to comment 9-C.

Sincerely,

Elden Hughes
Chair
Sierra Club
California Nevada
Desert Committee

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National Parks
and Conservation Association

PACIFIC REGIONAL OFFICE

BRIAN HUSE
Regional Director

26 February 1998

Ernest Quintana
Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

RE: DRAFT BACKCOUNTRY AND WILDERNESS MANAGEMENT PLAN

Dear ~~Mr. Quintana:~~ Ernie

The National Parks and Conservation Association (NPCA) appreciates the opportunity to respond with comments on the above referenced document. As you know, NPCA is America's only private nonprofit citizens organization dedicated solely to protecting, preserving and enhancing the U.S. National Park System. We represent nearly 500,000 members, 70,000 of which live in California.

Joshua Tree National Park is unique in many ways. It is widely recognized as one of the most pristine ecosystems left on our planet. Relative to most large, natural parks, development has been kept to a minimum, affording the visitor an essential national park experience. Planning for the park has attempted to retain these features with significant success. The recently released General Management Plan acknowledges the importance of managing the park for its fundamental values. The Proposed Action (Alternative A) for management of Joshua Tree's backcountry and designated wilderness generally continues this trend and NPCA largely supports it.

Our comments reflect NPCA's position that management of designated wilderness needs to uphold the fundamental principles of the Wilderness Act. Therefore, actions which follow from this plan must assure the highest level of protection such that the land "retains its primeval character and influence." 16 U.S.C.A. § 1131(c)

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COMMENTS

Ernest Quintana
Draft Backcountry and Wilderness Plan
Page 2

Purpose and Need for the Plan

As this plan provides a blueprint for National Park Service actions in wilderness, it is imperative that it fully manifest the federal law, policies and regulations which govern wilderness management. Since a significant portion of the plan addresses visitor use of wilderness, establishing guidelines for appropriate use will help direct management and educate the wilderness visitor. For example, in describing wilderness on page 11, the plan identifies Joshua Tree's wilderness as "set aside for the preservation of the most primitive and unconfined forms of recreation." This is, in truth, a misrepresentation of the Wilderness Act. While wilderness is in part defined as "having outstanding opportunities for solitude or a primitive and unconfined type of recreation," it is set aside to ensure that management agencies "preserve its wilderness character." 16 U.S.C.A § 1131(c) & 133(b). Therefore, while recreation opportunities exist and can be an important part of the wilderness experience, they cannot come at the expense of wilderness character or values. 10-A

Similarly, in establishing the compass points for Planning Direction on page 12, management goals must be clearly based on the federal law, policies, and regulations governing wilderness These are the benchmarks managers must use to assure that the plan ultimately protects the resource.

Alternative A - Proposed Action

Management Zoning

NPCA has enjoyed a spirited dialogue with the park on the subject of zoning wilderness. Early on, planners suggested establishing a variety of zones for wilderness, each being managed to different standards. While we appreciate that the park has moved away from the concept of developing "wilderness management zones," a clear violation of the Wilderness Act, we are unable to support the new designation of "experience classes" for wilderness.

The park seems to see experience classes as a tool prepare potential wilderness visitors for their likely wilderness experience. For example, a visitor to Class A will be led to expect a greater degree of visual or aural intrusion than might a visitor to Class B. There are three problems with this. First, it should be obvious to most wilderness users that the farther one moves away from non-wilderness the more primeval their experience will be. 10-B

Second, the Park Service is undermining its own management by lowering expectations and confusing the visitor as to what wilderness is. If experience class A accepts intrusion by the modern world, it may seem to some that certain types of activities permissible in developed areas of the park are appropriate here as well. It would follow that lowered expectations regarding human intrusion could lead to increased acceptance of actual impairment to wilderness. With few exceptions, wilderness protection is absolute. Planning which condones impairment of a wilderness area because of its proximity to human intrusions violates the intent of the Wilderness Act.

REMARKS

10-A – The Wilderness Subzone description has been rewritten to better describe wilderness. While recreation is an appropriate use of wilderness, the revised language states clearly that it is not the only or the most important use. See page 22.

10-B – The "experience classes" of wilderness were deleted in the new proposed action (alternative E). See the description of the wilderness subzone on page 22.

COMMENTS

Ernest Quintana
Draft Backcountry and Wilderness Plan
Page 3

Finally, the plan itself is contradictory on this subject. While Class A, it is suggested on page 29, is to be managed no less protectively than Class B, the establishment of group size limits (12 for Class A, 8 for Class B) clearly indicates the Park Service is willing to accept greater visitor impacts to this zone.

Proposed Additions to Designated Park Wilderness

NPCA supports the recommendations specified in the Proposed Action. In addition, we recommend the plan also include the Little San Bernardino Mountains, located within the newly added lands. 10-C

Visitor Enjoyment

Trails - NPCA supports the proposed designation of trails. As this is the first time that bicycles will be allowed on designated trails, we recommend adding language which directs the park to monitor this activity should any resource impacts or conflicts with other user groups occur. 10-D

Hiking - NPCA supports the Proposed Action

Stock use - NPCA supports the limitation of stock to horses and mules. It is a goal of the Park Service to manage park land in such a way as preserve natural processes. The introduction of non-native animals would, therefore, be in conflict with this goal. While NPS has made exceptions for horses and mules for traditional use reasons, these should not be extended to llamas nor any other potential pack animal. 10-E

NPCA is concerned with the language which could allow for future development of new parking for horse trailers based solely on visitor trends. Increasing pressure by user groups, in and of itself, cannot be used to support development in the park. Only after a complete analysis of the impacts of current and potential future use can this be contemplated. Similarly, the plan should include the potential for controlling stock use through group size limitation. 10-F

Bicycle Use - NPCA supports the Proposed Action with the caution noted under "Trails".

Roads - NPCA supports the Proposed Action We strongly oppose, however, any consideration which would allow vehicle access on the road east of the Coxcomb Mountains. 10-G

Climbing - We incorporate by reference the proposed alternative climbing policy submitted by the Access Fund, Wilderness Society, Friends of Joshua Tree, and NPCA.

Automobile Camping - NPCA supports the Proposed Action.

Group Size - NPCA does not support the proposal to create different overnight group size limits under an experience class zoning system (please see comments under "Management Zoning"). We recommend setting a limit of 8 throughout designated wilderness. The overnight group size 10-H

REMARKS

10-C - The Little San Bernardino Mountains has the greatest concentration of private lands within the Park. More than 12,478 acres in 209 parcels of privately-owned land remains in the Little San Bernardino Mountains even after the acquisition of large parcels of privately-owned land for potential donation by The Wildlands Conservancy and the anticipated transfer of state lands. Many small tracts, the subdivided fragments of the railroad land grants, lie scattered throughout the area.

Portions of wilderness unit #3 were excluded from wilderness designation in 1976 because there were several large nonfederal tracts of land when the proposal was made. The tracts have now been acquired, and *Backcountry and Wilderness Management Plan* fulfills the condition to recommend that the wilderness boundary be adjusted to include these tracts. Similar action could be taken at the time that the Federal government acquires a greater percentage of the remaining non-Federal lands. The plan does propose that 27,000 acres of the terminus of the Little San Bernardino Mountains be designated as a wilderness study area. See page 28.

10-D – The new proposed action prescribes that the trail network be inventoried, developed, and monitored for several years before considering any requests from the public for new trails. Monitoring the trail network will become an on-going process. If, during monitoring, it is determined that resource damage or conflicts between users groups are occurring, the National Park Service has the authority to either close trails or corridors or reroute trails to mitigate the damage and prevent future resource or visitor experience degradation. See page 32.

10-E – Stock is limited to horses and mules. Based upon a recommendation from the Joshua Tree National Park Advisory Commission, the new proposed action (alternative E) does provide for a study of the use of llamas at the discretion of the Superintendent. The primary consideration of such a study would be the protection of park resources and consistency with the National Park Service's mission. See page 32.

10-F – Future parking areas for horse trailers were not addressed in the *General Management Plan.* No action would be initiated unless environmental analysis with public review and comment was conducted. The new proposed action (alternative E) provides that the Superintendent has the discretion to adjust group numbers based upon impacts to the resources or special needs. The Superintendent also retains the discretion to monitor day use and establish group size limits for day use. See page 46.

COMMENTS	REMARKS
Remarks 10-G and 10-H are continued from previous page.	10-G – Comments noted. 10-H – The wilderness experience class zoning has been deleted from the new proposed action (alternative E). All of the park's wilderness will be managed the same, so there are no longer different group sizes for the wilderness subzone. A team using the Visitor Experience Resource Protection process determined the backcountry transition subzone's group size limit of 25. The number was based upon historic organized use and expectations of future use. The National Park Service's professional judgment was that this number was reasonable and could be accommodated.

COMMENTS

Ernest Quintana
Draft Backcountry and Wilderness Plan
Page 4

limit of 25 in the Backcountry Transition Zone appears high. Please include the justification and analysis supporting this number. Finally, to protect the backcountry and wilderness, the plan must include language which allows NPS to establish limits on numbers of groups through the use of a permit system.

Area closures - NPCA supports the Proposed Action. 10-I

Artificial Water Sources - NPCA supports the Proposed Action. We do, however, request clarification for the reference on page 41 to NPS -77, "Habitat Manipulation on Lands." It is our understanding that NPS is authorized to restore habitat which has been altered or disturbed. Is it the intent of the plan to suggest that wilderness, which is otherwise pristine, can be manipulated in response to disturbed habitat outside the park? 10-J

Desert Tortoise Recovery - NPCA supports the Proposed Action with one exception. As in the past, we strongly oppose the permitting of organized motor vehicle events on unpaved roads. At the very least, permitting of such events requires not only consultation with U.S. Fish and Wildlife, but also compliance with the National Environmental Policy Act. 10-K

Again, NPCA appreciates this opportunity to comment on the Draft Backcountry and Wilderness Plan. Please contact me if you have any questions.

Sincerely,

REMARKS

10-I – Comment noted.

10-J – The new proposed action (alternative E) recommends that each functioning, artificial water source be examined to determine if the artificial water source is replacing a natural source within the park that has been disturbed or altered by human activities inside or outside the park. NPS-77 indicates that the National Park Service may allow the continued existence of a currently functioning artificial water source under certain conditions. The source must be documented in the resource management plan as necessary to help prevent a species of concern, such as the desert bighorn sheep, from declining below a stable population. The National Park Service may also allow such a water source if it simulates a natural feature, such as a spring or seep, or a natural process that has been altered or destroyed by human activities.

Any artificial water sources must also be evaluated based upon requirements of the Wilderness Act. The Wilderness Act allow an exception to the prohibitions in section 4(c) "as necessary to meeting minimum requirements for the administration of the area for the purpose of" the Wilderness Act. Because a central purpose in administering wilderness is to maintain wild populations of native animals, the minimum requirement would be used to allow the continued existence, installation, and servicing of artificial water sources, but only if such sources are deemed necessary.

All four major artificial water sources would be examined to determine if they meet National Park Service policy on habitat manipulation for native animal species dependency upon guzzlers and the minimum requirement for administration of wilderness.

10-K – The National Park Service would review any request for non-competitive motor vehicle events on a case-by-case basis. If the situation warranted, the National Park Service has the option of establishing a lower maximum number of participants. In addition, the National Park Service retains the option of limiting travel to specific roads in the park. If warranted, consultation with US Fish and Wildlife Service would occur prior to issuing a permit. The preparation of the *Backcountry and Wilderness Management Plan* fulfills the requirements of NEPA.

COMMENTS

THE DESERT PROTECTIVE COUNCIL, INC.
A NON-PROFIT ORGANIZATION
P.O. BOX 3635 • SAN DIEGO • CALIFORNIA 92163-1635

B5

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Erinie Quintana
Superintendent Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

JAN - 4

Dear Superintendent Quintana,

Re: Supplement to the Draft General Management Plan Amendment
Supplemental Environmental Impact Statement
Backcountry and Wilderness Management Plan, Joshua Tree National Park

Thank you for responding to the public comments on the Draft Backcounrty and Wilderness Management Plan, and for publishing the Supplement with Alternative E.

The Desert Protective Council (DPC) would like to summit the following comments;

Though Alternative E appears to meet the requirements of the climbing community, it does not support the protection of the wilderness as mandated in Public Law 88-577, The Wilderness Act. DPC an historical interest in wilderness. DPC is concerned with Section 4 (c):

> (c) Except as specifically provided for in this Act, and subject to existing private rights, there sh be no commercial enterprise and no permanent road within any wilderness area designated this Act and, expect as necessary to meet minimum requirements for the administration of th area for the purpose of this Act, there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.

The DCP is concerned with two sections of the Supplement 1) Visitor Enjoyment (pp. 19-33) an the "determination if lands not now designated for wilderness should be proposed for designation." (p te)

As to #1 (above) It appears that Alternative E would include exemptions or would diminish wilderness the experience for almost all visitors by satisfying the complaints of a small percentage of park visitors (users). 11-A

#2 appears to by-pass the Congressional mandate(s) for designating wilderness, especially of areas added by the California Desert Protection (CDP) Act (1994). 11-B

To safeguard for wise and reverent use by this and succeeding generations those desert areas of unique scenic, scientific, historical, spiritual and recreational value, and, to educate children and adults to a better understanding of the deserts

REMARKS

11-A – A more thorough discussion of wilderness, prohibitions in wilderness, and the exceptions to those prohibitions for the administration for the purpose of the Wilderness Act has been added to the wilderness subzone section on page 22. The permanent installation of bolts in wilderness may be considered an exception to the prohibition of permanent installations in wilderness if the bolts contribute to the administration of the area for the purpose of wilderness. Trails through wilderness can provide for user safety and confine impacts to defined areas as they provide access through wilderness and provide for the enjoyment of wilderness itself. Thus, the installation of bolts can provide for climber safety, limit impacts, and provide access to climbs of exceptional quality that enhance the user's ability to experience a primitive and unconfined type of climbing experience. This language has been added to the discussion of new bolts in wilderness on pages 43 and 44.

The Wilderness Act recognizes recreation as an appropriate use of wilderness in a manner consistent with the underlying purposes of wilderness – maintaining naturalness and providing opportunities for solitude. Primitive and unconfined types of recreation may require the construction or maintenance of minimum facilities, such as trails. Trails providing access to and within wilderness serve the transportation needs of visitors and administrative personnel and are often a key tool to keep visitor use within the capacity of the wilderness. The location and type of trails to a wilderness area's boundaries, trailhead improvements, and the type of trail network within the area are important factors in influencing the number of visitors and in dispersing use to reduce environmental impacts and social impacts to visitors themselves. Trails are acceptable in a wilderness when they are constructed for these purposes. Similarly, climbing routes that use fixed anchors can also perform the same functions.

While recreation is a recognized use of wilderness, it is neither the only nor the most important use. Some thought should be given to leaving large portions of a wilderness area free of trails. In fact, a cursory review of the figures 6 on page 34 and 8 on page 47 reveal that the vast majority of the park is free of trails and fixed anchors. Visitor use can be dispersed by constructing new trails where trails are already located or, more often, simply through better maintenance of the existing trail network.

COMMENTS

The FEIS should include a full statement justifying the establishment of a Climbing Subcommittee when management of wilderness in Joshua Tree National Park is a major responsibility. | 11-C

In summary, the DPC can not support any Alternative that degrades or intrudes into designated CDP Act added wilderness. The DPC requests a full and separate EIS for the designation as wilderness lands added to Joshua Tree National Park in 1994. | 11-D

Please keep the DPC on all mailing lists for future hearings and documents.

Sincerely,

Douglas W. Allen
DPC, President

REMARKS

11-B – All of the areas designated as wilderness by the California Desert Protection Act of 1994 are so acknowledged and have received management prescriptions in accordance to the Wilderness Act in the proposed action (alternative E).

The Little San Bernardino Mountains has the greatest concentration of private lands within the Park. More than 12,478 acres in 209 parcels of privately-owned land remains in the Little San Bernardino Mountains even with the acquisition of large parcels of privately-owned land for potential donation by The Wildlands Conservancy and the possible transfer of state lands. Many small tracts, the subdivided fragments of the railroad land grants, lie scattered throughout the area.

Portions of wilderness unit #3 were excluded from wilderness designation in 1976 because there were several large nonfederal tracts of land when the proposal was made. The tracts have now been acquired, and *Backcountry and Wilderness Management Plan* fulfills the condition to recommend that the wilderness boundary be adjusted to include these tracts. Similar action can be taken for the Little San Bernardinos at the time that the Federal government acquires a greater percentage of the remaining non-Federal lands.

The plan proposes that 27,000 acres of the terminus of the Little San Bernardino Mountains be designated as a wilderness study area. Page 28

11-C – Comment noted.

11-D – The National Park Service has fulfilled its commitment to manage the lands added to the park as designated in the California Desert Protection Act of 1994 through the development of this *General Management Plan Amendment* and *Environmental Impact Statement.*

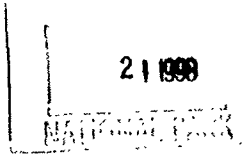
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Pacific Crest Outward Bound School
Joshua Tree Program

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December 18, 1998

Ernest Quintana, Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277



Dear Mr. Quintana:

I would like to comment on the New Proposed Action for the Backcountry and Wilderness Management Plan. Thank you for all the work you and your staff have put into this plan, and into considering the many comments relating to it. I can imagine that this is a significant project to take on. I have reviewed the plan and will comment on the sections that seem especially relevant or noteworthy form my perspective as Joshua Tree Program Director for the Pacific Crest Outward Bound School.

I support the exception to the requirement for overnight campers to park and register at a backcountry board for those wishing to do so in the remote areas of the park, as indicated on page 20 of the Supplement. Would overnight parking be allowed at access points to these areas? On Pacific Crest Outward Bound courses we generally park a vehicle near the backcountry areas that our groups are in as an emergency vehicle. To have this as an option would be favorable for our risk management practices. 12-A

It appears that Johnny Lang Canyon, Fried Liver Wash, and the Big Wash route through the Eagle Mountains are proposed corridors for horse travel (page 20). These wonderful hiking routes could be quickly degraded by equestrian use. My observation of horse impact in the desert is that horses create rather significant trails very quickly, much more so than human foot travel. Enough humans going over a route enough times will also beat a trail, but human trails tend to be much shallower and will repair much more readily. Broad, sandy washes are the travel areas where impact is most quickly erased by rain or wind. From what I have seen, equestrian users do not seem to be able to stay in the sandy areas, but inevitably carve paths along the sides of the wash in numerous places. Their waste is unsightly and tends to be preserved for long periods of time in the dryness of the desert. I am especially opposed to horses being allowed in Johnny Lang Canyon. That is a very pretty canyon, and access is relatively easy. It could quickly become very impacted if horse use is allowed there. Equestrian use has already beat such a complex network of trails in the Black Rock area that I suggest that area be considered an impact zone for horses. I would like to see horse use restricted in other areas of the park, with the exception of the California Riding and Hiking Trail. 12-B

I think the proposal to allow the replacement of existing bolts throughout the park is reasonable (page 28). Outward Bound has little need to install or replace bolts, but if there

12-A – The only exception to parking at the backcountry bulletin boards exists for those entering the remote areas of the park, such as the eastern Pinto Basin and the Coxcomb, Pinto, Eagle, Little San Bernardino, and Cottonwood mountains, from outside the park boundary. Those entering the park in these remote locations are not required to park at a backcountry self-registration board, but a permit is still required. See page 32.

12-B – The new proposed action prescribes that the trail network, including corridors, be inventoried, developed, and monitored for several years before considering any requests from the public for new trails. Monitoring the trail network will become an on-going process. If, during monitoring, it is determined that resource damage or conflicts between users groups are occurring, the National Park Service has the authority to either close trails or corridors or reroute trails to mitigate the damage and prevent future resource or visitor experience degradation. See page 32.

COMMENTS

were a loose bolt at a climbing site that we use, I would be encouraged to know that we could replace it with one that was more secure.

As stated on page 29, the process for placements of new bolts in non-wilderness areas needs to be developed and refined. I recognize that the proposal is more in the way of principles than an actual plan.

The proposal for new bolts within wilderness seems to be negated by the statement found on page 30; "In general, the NPS shall ensure that future levels of climbing-related impacts in wilderness do not exceed 1998 levels. The NPS would take actions to reduce existing impacts wherever possible." One interpretation of this is that no new bolted routes would be allowed in wilderness, since any new route is an additional impact, to some degree. The statement also implies that existing bolts may be removed. It seems that a far more significant impact of climbers is in the form of trails and cliff base vegetation impacts. If the NPS is to address these impacts, focusing directly on them would make sense, rather than trying to indirectly address them through limiting the number of bolts on vertical rock faces, if that is the case. I note that the issues of access trails and impact at the base of climbs is addressed on pages 30 and 31, and I am in support of NPS intentions in this regard

12-C

Considering the spectrum of issues the NPS wishes to address, it seems that degradation from the use of chalk is insignificant. An educational approach to this issue would seem more appropriate than a regulatory approach.

12-D

The fixed anchor zone noted on page 31 seems reasonable. I suggest that the rock formations that form the corridors along washes providing access to the Wonderland of Rocks from Barker Dam not be included in a Fixed Anchor Free Zone, due to the historical use of fixed anchors in those areas.

12-E

The group sizes for backcountry camping are noted, and seem reasonable (page 32). I believe that it is important to educate backcountry users in "Leave No Trace" minimum impact practices. I think the use of such practices is perhaps more important in minimizing the impacts of backcountry users than is a smaller limit on group sizes. Pacific Crest Outward Bound strives to teach and practice a "Leave No Trace" backcountry ethic on all our courses.

12-F

Again, thank you and your staff for all your work. I hope that positive relations will continue between Pacific Crest Outward Bound and Joshua Tree National Park, as both organizations examine and refine their plans and operations.

Sincerely,

Dennis McDade

Dennis McDade
Joshua Tree Program Director

REMARKS

12-C – There are many climbing routes already established in the park's wilderness. The number of bolted routes in wilderness is less important than the cumulative levels of resource impacts associated with climbing those routes. Wilderness is a finite resource, however, and continued unregulated placement of bolts in Joshua Tree National Park's wilderness is unsustainable. Existing bolted routes would not necessarily have to be removed before additional bolted routes can be established in wilderness. No new bolted routes would be permitted if they would increase the cumulative levels of impacts to the wilderness resource beyond those estimated for 1998.

12-D – The new proposed action prescribes that the National Park Service, with the Climbing Committee, would work with climbers to coordinate voluntary chalk clean-ups and develop protocols for using chalk.

12-E – The language in the fixed-anchor free zone has been changed to read "rock formations, which form the corridor along the Nature Trail providing access from the parking lot to Barker Dam (not including the major formations that are merely visible from the Barker Dam Nature Trail)." See page 45.

12-F – Comments noted.

242

SERAC MOUNTAINEERING CLUB, INC.

PO BOX 1040
Salem UT 84653

41 21

1998

December 7, 1998

Park Superintendent Quintana
Joshua Tree Park
74485 National Park Drive
Twenty-nine Palms, CA. 92277

Dear Sir:

This letter is in regard to a promise you made to the climbing community concerning the Joshua Tree National Park. It has come to our attention that you intend to renege on that promise. I would ask you to please reconsider your position. As you know, representatives from the Access Fund, the Wilderness Society, the National Parks and Conservation Assoc., and the Friends of Joshua Tree have worked very hard to develop the original plan. For you to change this on a whim due to the input of one person (Joan Taylor) is very unfortunate. Although Joan Taylor is an administrative member of the Sierra Club, she does not represent this association on the policy making level. Her opinion is "only" her opinion and should be considered as thus. It should not carry more weight than any other single opinion. There are many people out there that not only have thoughts on the subject, but also have a stake in it as well.

Joshua Tree is not just a local campsite any more. It is known world-wide as a wondrous climbing and outdoor recreational area. We, here in America are experiencing a boom in all areas of out-door recreation. We are the host to people from almost every country of the world. Our government is a model for the increase in world-wide democracy. When people from foreign countries come to the U.S., they are not here to only enjoy our wonderful and glorious parks and recreational areas but to also experience the true meaning of freedom. Should we disappoint them? Should we show the world that we are no better than the crumbling dictatorships of the Third World?

Granted, we all need to give a hand in preserving our natural treasures so that generations to come will be able to experience them as well. This is an area that the private sector is getting more and more involved with every day. The emergence of special interests groups with the conservation and protection of our national wilderness areas is on the upswing. These groups are able to study and develop management plans that not only take into consideration the publics use of these areas but also the preservation and conservation of these areas.

Governmental entities have a track record of over-reacting and over-restricting when developing legislation in this area. This serves no one. Often the plans developed by specific governmental committees are not only very expensive to institute but they are practically impossible to enforce. They target only one or two specific user-groups as bad guys, and allow only a few particular and highly specific groups to do as they will (very one-sided). The groups involved in producing the original draft are not of one political mind but are of a diverse lot. For these people to come to terms and draft a plan that is not only workable but is acceptable by all parties is and should be considered a landmark and should be studied by all government land management committees.

Please, we ask you to stick to your guns and adopt the original plan or let the people that developed the original draft have the time to study the changes you have made and work the bugs out of them, to the benefit of all who use the park.

Sincerely,
Michael A. Riches,

Vice-President
SERAC Mountaineering Club, Inc

13-A – Comments noted.

COMMENTS

REMARKS

DESERT SURVIVORS

supct 74

Desert Survivors
2043 Berryman Street
Berkeley, CA 94709

December 16, 1998

JTA TREE

23 1998

Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

SUBJECT: Backcountry and Wilderness Management Plan
Supplement to the Draft General Management Plan

Dear Superintendent:

Thank you for providing the public with this opportunity to comment on the Supplement to the Draft General Management Plan for the backcountry and wilderness areas of Joshua Tree National Park.

These comments are submitted on behalf of Desert Survivors. We are a non-profit organization of nearly 1,000 members dedicated to protecting, preserving and exploring desert wilderness. As part of these efforts, we organize a number of remote wilderness backpacks within Joshua Tree National Park and surrounding areas each year. Hence, the way in which the National Park Service manages backcountry and wilderness is of great interest to us.

Our comments regarding the New Proposed Action are as follows:

TRAILS

We oppose eliminating the requirement for parking and visitor registration at backcountry boards for overnight visits to wilderness.

We have organized and conducted numerous overnight backpacks in the Pinto Basin and into the Coxcomb, Pinto, Eagle, Little San Bernardino, and Cottonwood Mountains. We either park at backcountry boards, as currently required, or on adjacent BLM lands, and then walk right to where we want to go. There is no part of the Park that cannot be visited in the course of a three or four day backpack by these means.

14-A

14-A – We agree with your assessment that backcountry visitors need to be aware of the rules and regulations regarding backcountry and wilderness use. The option of not parking at a backcountry self-registration board when beginning a trip from outside the park boundary does not relieve visitors from obtaining a permit. A backcountry use permit is still required and can be obtained from any ranger, at any ranger station, and at the visitor centers. Permits could also be requested by telephone. This still provides the National Park Service the opportunity to ensure that all backcountry users receive information about the rules and regulations. See page 32.

COMMENTS

By requiring such registration, backcountry visitors are given the opportunity to become aware of the rules and regulations regarding backcountry and wilderness use. It is also a system that enhances public safety and law enforcement efforts. Without such a requirement, there is no opportunity for the visitor to become aware of the rules. We believe that waiving this requirement will lead to increasing violations of the rules regarding backcountry use, degrade public safety and hinder law enforcement activities. Without some controls on overnight parking, the backcountry can become a "free-for-all". 14-A

CLIMBING

We are strongly opposed to the new proposed action that would allow existing bolts to be replaced and new bolts installed in backcountry and wilderness areas of the Park, even on the limited basis proposed. 14-B

The purpose of the National Park System is resource protection – not to provide a rock gymnasium. Climbing activities that modify the landscape with social trails and bolting, are, in our view, completely unacceptable in backcountry and wilderness areas.

With respect to climbing, we reiterate our earlier support for Alternative C, which allows bolting only in developed zones. If the Park Service cannot support Alternative C, the earlier draft proposed Alternative A was at least minimally consistent with the resource protection mission of the Park Service.

Alternative E is not consistent with the mission of the Park Service to protect resources, is unworkable in practice, and represents the triumph of a letter writing campaign by climbers over the earlier good sense represented in Alternatives A and C.

CAMPING

Although only proposed as a study, we must express our opposition to the idea that a primitive campsite would be considered for the Little San Bernardino Mountains. Our opposition is based on the same principles set forth above in our arguments against waiving the backcountry board registration requirement for remote areas. 14-C

REMARKS

14-B – The National Park Service Organic Act directs the Service to preserve park resources "unimpaired," while providing for the public enjoyment of those resources. Because public enjoyment cannot be sustained if park resources are damaged or compromised, resource protection must necessarily be the Service's paramount responsibility. Within that constraint, the National Park Service must manage recreational activities and settings to protect park resources, provide for public enjoyment, promote public safety, and minimize conflicts with other visitor activities and park uses. The Service is directed to monitor recreational activities and assess their potential impacts on park resources. When there is potential for adverse impacts, the Service will initiate an appropriate policy or regulations response to prohibit or control the activity and avoid the adverse impacts. (Page 28)

The Wilderness Act recognizes recreation as an appropriate use of wilderness in a manner consistent with the underlying purposes of wilderness – maintaining naturalness and providing opportunities for solitude. Primitive and unconfined types of recreation may require the construction or maintenance of minimum facilities, such as trails. Trails providing access to and within wilderness serve the transportation needs of visitors and administrative personnel and are often a key tool to keep visitor use within the capacity of the wilderness. The location and type of trails to a wilderness area's boundaries, trailhead improvements, and the type of trail network within the area are important factors in influencing the number of visitors and in dispersing use to reduce environmental impacts and social impacts to visitors themselves. Trails are acceptable in a wilderness when they are constructed for these purposes. Similarly, climbing routes that use fixed anchors can also perform the same functions. The installation of bolts can provide for climber safety, limit impacts, and provide access to climbs of exceptional quality that enhance the user's ability to experience a primitive and unconfined type of climbing experience.

While recreation is a recognized use of wilderness, it is neither the only nor the most important use. Some thought should be given to leaving large portions of a wilderness area free of trails and fixed anchors. A cursory review of figures 6 on page 34 and 8 on page 47 reveal that the vast majority of the park and its wilderness is free of trails and fixed anchors.

SUMMARY

In summary, Alternative E should not be adopted without further modifications, as set forth above. Without modifications to the proposed action, the Park Service will not be able to perform its primary mission of resource protection.

14-D

Thank you for considering our views. We appreciate all the work your staff and you have done to prepare these draft management plans and respond to public comments such as ours.

Sincerely,

Dave Halligan

Dave Halligan
Chair, Joshua Tree National Park Task Force
Desert Survivors

14-C - Any action to designate a campsite in the Little San Bernardino Mountains would require the preparation of environmental analysis documentation, probably in the form of an Environmental Assessment (EA). Consultation with the U.S. Fish and Wildlife Service would occur during the development of the environmental analysis. An EA would provide the public with the opportunity to review and comment upon the proposed action.

14-D – Comments noted.

COMMENTS

REMARKS

Friends of Joshua Tree
P.O. Box 739
Joshua Tree, CA 92252

January 7, 1999

Dear Superintendent Quintana,

Please consider this as the comments from Friends of Joshua Tree on the Backcountry and Wilderness Management Plan. I will be specifically addressing the alternative Climbing Management Plan. We support the plan which was worked out with the Access Fund, The Wilderness Society, the National Parks and Conservation Association, and the NPS. We believe that it will be accepted and supported by the climbing community and will provide a solid basis for preserving park and wilderness values.

We believe that the alternative focuses climbing management policy on all aspects of climbing that have impacts to park resources and can be a way for the NPS and climbers to work cooperatively. The plan relies on strategies proven effective at other climbing areas. The Climbing Committee which will advise the NPS on climbing issues and make recommendations to the superintendent on the establishment of new bolted routes in Joshua Tree has been widely discussed within climbing circles and I have had many responses indicating that people are ready and willing to serve in this capacity.

We have some reservations about the alternative climbing plan as well. The plan includes unprecedented restrictions on climbing and many critical decisions have been left open for the park service to make in the future. We feel that all future management decisions in regards to climbing should be brought to the Climbing Committee for input before implementation We specifically do not support the "interim" permit requirement for new bolted routes in non-wilderness. In all previous discussions with NPS we only talked about permits for wilderness areas. Many of the climbing restrictions are not justified. Even though there are thousands of climbing routes in Joshua Tree there has been no scientific evidence presented that this fact has caused significant degradation of the park's natural resources, had an adverse impact on park wildlife, or has diminished the experiences of non-climbers in the park. . The new route cap was originally proposed only for the park's wilderness areas and should not apply to all park lands. The idea of bolt or route removal

15-A

15-B

15-C

15-D

15-A – Because the National Park Service is interested in receiving recommendations and advice from the Climbing Committee on some of these issues, portions of the plan were intentionally left vague. The Climbing Committee cannot be established until a record of decision is signed, and so some of these decisions will not be made until the National Park Service receives the input of the Climbing Committee.

15-B – While the National Park Service completes the inventory of climbing impacts, there would be a 1-year period during which a permit would be required before new bolts could be placed in the developed zone and the backcountry transition subzone. During this interim period, proposals for new bolted routes must be submitted to the Superintendent, who would work with the Climbing Committee to evaluate them based upon the criteria developed for the checklist. As part of a proposal to place new bolts during this interim period, the climber must also complete and submit the checklist, which would verify that all criteria for new bolt placements are adhered to.

15-C - The National Park Service Organic Act directs the Service to preserve park resources "unimpaired," while providing for the public enjoyment of those resources. Because public enjoyment cannot be sustained if park resources are damaged or compromised, resource protection must necessarily be the Service's paramount responsibility. Within that constraint, the National Park Service must manage recreational activities and settings to protect park resources, provide for public enjoyment, promote public safety, and minimize conflicts with other visitor activities and park uses. The Service is directed to monitor recreational activities and assess their potential impacts on park resources. When there is potential for adverse impacts, the service will initiate an appropriate policy or regulations response to prohibit or control the activity and avoid the adverse impacts. Therefore, the Service should not wait until a use becomes a significant impact, but should take a proactive stance to prevent degradation to resources, an adverse impact on wildlife, or diminishment of other visitors' enjoyment from occurring. See page 28.

COMMENTS

is controversial, no one that I've spoken with would be willing to remove established climbs. The plan's stated goal of "keep(ing) the cumulative impacts of climbing in wilderness to levels at or below 1998 conditions" does not bode well for those climbers who may request a bolting permit, as a matter of fact it seems to indicate that unless some bolts are removed no new bolting will be allowed this is not opening the doors of cooperation. 15-D

The Friends of Joshua Tree believe that the alternative for climbing management represents a good-faith effort of the NPS, climbers and the environmental community to protect Joshua Tree from overuse while still providing a varied and quality climbing experience. We support the plan generally, while encouraging the NPS to clarify or change elements of the plan which may be problematic with the help of the Climbing Committee. We do not wish to defer the implementation of the climbing plan for any longer. Obviously the standing moratorium on bolting is not working effectively and we feel the need for a more cooperative plan. We trust that you, the NPS, will implement the plan fairly, objectively and in a timely manner. 15-E

Thank you for the opportunity to comment, and thank you for your consideration of our thoughts and ideas which are submitted.

Sincerely,

Cyndie Bransford

Cyndie Bransford

REMARKS

15-D – There are many climbing routes already established in the park's wilderness. We concur in that the number of bolted routes in wilderness is less important than the cumulative levels of resource impacts associated with climbing those routes. Existing bolted routes would not necessarily have to be removed before additional bolted routes can be established in wilderness. However, wilderness is a finite resource and continued unregulated placement of bolts in Joshua Tree National Park is unacceptable. No new bolted routes would be permitted if they would increase the cumulative levels of impacts to the wilderness resource beyond those estimated for 1998.

15-E – Comments noted.

AMERICAN SAFE CLIMBING ASSOCIATION

101

December 23, 1998

Ernest Quintana, Park Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Dear Mr. Quintana,

I am writing as the president of the American Safe Climbing Association to state my support and concern for the proposed Supplement to the Backcountry and Wilderness Management Plan for Joshua Tree National Park.

The American Safe Climbing Association is a non-profit organization dedicated to improving the safety of climbing in an environmentally sensitive manner. Although we support the plan and are urging other climbers to do so, we still feel there are issues in the plan that need to be more clearly addressed. Our main concern is that the new rules for climbing and establishing new routes are too vague to be effective. The ASCA is feels uneasy that the "cap" on new bolted routes that will be allowed has yet to be determined and that other management decisions like the permit system for new bolted routes have been put off until later.

16-A

While we urge the Park Service to clarify the issues listed above in the final plan, The American Safe Climbing Assn. supports the plan and encourages future dialogues between climbers, environmental groups, and the National Park Service.

Sincerely,

Chris McNamara
President

cc: Senator Barbara Boxer
Congresswoman Lynn Woolsey

ADVISORS Dougald MacDonald *Rock & Ice*, Mark Melvin, *Northern California Climbing Centers*, Armando Menocal, *Founder, The Access Fund*, John Middendorf, *Friends of Yosemite Valley*; Brooke Sandahl, *Metolius* PRESIDENT Chris McNamara.

2 BRADFORD WAY ■ MILL VALLEY, CA 94941 ■ 415.388.2132 ■ FAX 389.8595 ■ E-MAIL CCMCN@AOL.COM

16-A – Because the National Park Service is interested in receiving recommendations and advice from the Climbing Committee on some of these issues, portions of the plan were intentionally left unspecific. The Climbing Committee cannot be established until a record of decision is signed, and so some of these decisions will not be made until the National Park Service receives the input of the Climbing Committee.

California Native Plant Society

January 27, 1998

Superintendent Ernest Quintana
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Re: Backcountry and Wilderness Management Plan

Dear Superintendent Quintana:

The California Native Plant Society (CNPS) is concerned that concentrated use of backcountry and wilderness resources by recreationists—be they hikers, equestrian or climbers—pose potential threats to the long-term survival of rare plant communities and plant species. During the scoping and interest group discussions for this plan, CNPS strongly recommended that the National Park inventory its vegetative resources prior to making management plans, so that trails could be planned to avoid sensitive resources. We understand that budget and technological contraints have limited the Park's ability to develop such inventories, and that the Park needs to take management action to prevent unnecessary degradation of resources. What is lacking in this management plan, however, is a clear timetable between the identification of impacts and the implementation of management actions, such as temporary area closures, re-routing of trails, or changes in authorized usage that would be needed to mitigate damage to resources.

17-A

While CNPS supports the concept of maximum protection for park resources, we are unable to assess whether the "maximum protection" alternative is indeed "maximum" due to the lack of scientific information presented. In particular, we have strong concerns regarding the use of stock animals in the park and the long-term effects of climbing as they relate to vegetation. If the management goal truly is "to preserve park resources unimpaired for future generations," the Park must seriously consider the impacts to vegetation caused by the use of stock animals and the potential for introduction of non-native plants, and the impacts climbing has on the specialized vegetation found on rock outcrops. Furthermore, since disturbance to the soil (and cryptogammic crusts) is associated with the introduction of weed species, CNPS is particularly concerned with the focused impacts of all forms of travel (hiking, biking, equestrian) in washes.

Joshua Tree National Park, with its key location straddling the Mojave and Sonoran (Colorado) deserts, is a vast resource of natural habitat, which, as the public lands surrounding it are managed for "multiple use," might some day end up being the core, undisturbed repository of native plants and animals in this region of the California Desert. We believe that the Park Service's prime objective should be to protect these.

Regarding climbing, we support elements of the proposed action such as prohibiting removing vegetation from cracks (route-cleaning), and the creation of climbing exclosure areas. However, we request that the management plan be modified to include an identification of such exclosure areas and that a timetable be established for their creation. We also recommend that all currently unclimbed areas be identified and immediately be closed to climbing for study purposes. In addition, we strongly urge that a study of the rare species *Monardella robisonii* be undertaken, as

17-B

17-C

Dedicated to the preservation of California native flora

17-A – Currently, equestrians must stay on established trails, such as the California Riding and Hiking Trail and the Boy Scout Trail, or must use active washes. The new proposed action increases the number of miles of trails, but, in reality, restricts equestrians to designated trails rather than all trails plus active washes. Bicyclists are currently allowed on all roads open to motor vehicles. The new proposed action designates approximately 29 miles of bicycle trails, mostly on old roads. Cross-country hiking may occur throughout the park, except for Keys Ranch, but the use of the trail system will be encouraged.

Although on paper the new proposed action designates many more miles of trails than were previously official, it eliminates equestrian use of all active washes and limits use to officially designated trails and corridors. Casual or social trails not designated as part of the trail system would be restored to a natural condition. No new trail requests from the public would be considered until the trail network and corridors proposed in this plan is inventoried, developed, and monitored for several years. Monitoring the trail network will become an ongoing process. If, during monitoring, it is determined that resource damage or conflicts between user groups are occurring, the National Park Service has the authority to either close trails or corridors or reroute trails to mitigate the damage and prevent future resource and visitor experience degradation. (see pages 31 to 35)

17-B – Comments noted.

COMMENTS

it is described as being found "about rocks, Joshua Tree National Monument.[1]" This species is known from fewer than 20 locations, and is considered by the CNPS to be "rare throughout" its range[2].

17-C

We strongly urge the Park Service to do the following regardless of which alternative is implemented:

1) Develop a vegetation map based on plant series and associations and populations of rare plants that will allow managers and the public to evaluate whether trails, corridors and roads are in conflict with these resources.

17-D

2) Map all washes and their associated vegetation to determine what percentage of each kind of wash is being impacted by recreational use to assure that a significant portion of each wash type is being fully protected, that is, not having any designated corridor, trail, or road.

3) Develop a monitoring program to regularly assess the encroachment by non-native plants and the condition of plant communities where recreational use is being focused.

17-E

4) Where degradation to vegetative resources can be identified, implement management actions including but not limited to permanent or temporary area and corridor, route, trail, or road closures.

17-F

The California Native Plant Society understands that with the current budgets available to the Park Service, such long-term monitoring and vegetation mapping can only be quickly accomplished with volunteer help. We at CNPS look forward to cooperating with the Park Service to aid in such efforts, and hope that the Park Service will look to CNPS for such assistance.

Thank you very much for the opportunity to comment on this proposed plan.

Sincerely,

Steve Hartman

Steve Hartman
Desert Conservation Chair
California Native Plant Society
6117 Reseda Blvd. Suite H
Reseda, CA 91335

[1] Munz, Philip A. 1974. A Flora of Southern California. University of California Press. p. 531.
[2] Skinner, Mark W. and Bruce M. Pavlik. 1994. Inventory of Rare and Endangered Vascular Plants of California. CNPS.

REMARKS

17-C – In January 1999, the National Park Service began a project designed to examine the impacts of social trails in heavily climbed areas and to explore methods to mitigate those impacts. The project identifies high use areas that are heavily impacted by social trails and that would benefit from mitigation. The National Park Service installed vegetation plots to collect baseline information about vegetation diversity, richness, and density. Park staff and volunteers, working with input from the climbing community, delineated access trails. The project also inventories a species of concern, rock pennyroyal (*Monardella robisonii*), with the assistance of the California Native Plant Society. This inventory will continue through July 2000.

17-D – The National Park Service anticipates that such vegetation maps will be completed by 2001 or 2002.

17-E – With the implementation of the *Backcountry and Wilderness Management Plan*, the National Park Service will begin a monitoring program of the trail network, including the corridors designated for equestrian use. The National Park Service is also developing monitoring protocols in response to the recent fires that may be applied to other areas of concern.

17-F – If during the monitoring process, it is determined that resource damage is occurring, the National Park Service has the authority to either close trails or corridors or reroute trails to mitigate the damage and prevent future resource degradation. See page 32.

COMMENTS

The Colorado Mountain Club

710 10th St., #200 Golden, CO 80401 (303) 279-3080 1-800-633-4417 (303) 279-9690 Fax cmcoffice@juno.com

December 17, 1998

91

28 1998

Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Re: Joshua Tree Backcountry Management Plan comments

Dear Sir or Madam

On behalf of the Colorado Mountain Club (CMC), I am writing in response to the *Supplement to the Draft Backcountry and Wilderness Management Plan* (Management Plan) for Joshua Tree National Park. The Colorado Mountain Club is the largest outdoor recreation and education organization in the Rocky Mountain region, with over 10,000 members. Our members enjoy backcountry areas across the country through climbing, hiking, backpacking, mountaineering, and other activities. We agree that climbing is an appropriate form of recreation in national parks and that a balance is important in managing for the protection of the natural resources on these lands, their recreational resources, and the landscape aesthetics. Joshua Tree is one area that has been of particular interest to CMC members for years. For this reason, we felt that it was important to address our interests and concerns with regard to the Management Plan.

For the most part we are very impressed with the new concepts incorporated into the draft plan. The National Park Service obviously put in a great deal of effort to address both the aspects of climbing that could impact park resources as well as potential impacts of management decisions on climbers' activities. The creation of a Climbing Committee is a very progressive idea with a great deal of potential. The safety and aesthetics guidelines for replacement of fixed anchors is also well thought out from both climbing and conservation perspectives. We also commend the Park on its approach to dealing with the establishment and use of fixed anchors in wilderness areas.

There are, however, some concepts that we feel need to be better developed before the Management Plan is finalized. We feel the following points need to be better addressed:

- The "interim 'permit' process:" and the "monitored process" for the establishment of fixed anchors are too vague and undefined. 18-A
- There is no justification or explanation of the cap that will be placed on the number of new climbing routes with fixed anchors per year. 18-B

  It is unclear what the parameters of resource impacts study assessment of fixed anchors will be or how such assessments will be conducted or quantified.
- It is unclear how 1998 climbing impacts will be quantified and how subsequent relative impacts will be assessed. This is very important for purposes of compliance. 18-C

Groups: Aspen • Boulder • Denver • Denver Juniors • Denver Wilderness Kids • El Pueblo Fort Collins • Friends of Colorado • Gore Range • Longs Peak • Pikes Peak San Juan • Shining Mountains • Weld County • Western Slope

Colorado Fourteeners Initiative

recycled paper

REMARKS

18-A – Because the National Park Service is interested in receiving recommendations and advice from the Climbing Committee on some of these issues, portions of the plan were intentionally left unspecific. The Climbing Committee cannot be established until a record of decision is signed, and so some of these decisions will not be made until the National Park Service receives the input of the Climbing Committee. See page 41.

While the National Park Service completes the inventory of climbing impacts, there would be a 1-year period during which a permit would be required before new bolts could be placed in the developed zone and the backcountry transition subzone. During this interim period, proposals for new bolted routes must be submitted to the Superintendent, who would work with the Climbing Committee to evaluate them based upon the criteria developed for the checklist. As part of a proposal to place new bolts during this interim period, the climber must also complete and submit the checklist, which would verify that all criteria for new bolt placements are adhered to. See pages 41 to 43.

18-B – The National Park Service Organic Act directs the Service to preserve park resources "unimpaired," while providing for the public enjoyment of those resources. Because public enjoyment cannot be sustained if park resources are damaged or compromised, resource protection must necessarily be the National Park Service's paramount responsibility. Within that constraint, the National Park Service must manage recreational activities and settings to protect park resources, provide for public enjoyment, promote public safety, and minimize conflicts with other visitor activities and park uses. The National Park Service is directed to monitor recreational activities and assess their potential impacts on park resources. When there is potential for adverse impacts, the National Park Service will initiate an appropriate policy or regulations response to prohibit or control the activity and avoid the adverse impacts. Therefore, the National Park Service should not wait until a use becomes a significant impact, but should take a proactive stance to prevent degradation to resources, an adverse impact on wildlife, or diminishment of other visitors' enjoyment from occurring. See page 28.

COMMENTS

Remarks 18-C are continued from previous page.

REMARKS

18-C – Initial scientific studies have been completed, such as the impacts of climbing on raptor nest selection and the impact of rock climbing on bird and plant diversity. The National Park Service has taken other preliminary steps to obtain baseline information about resource impacts associated with climbing. Through surveys and sampling, the National Park Service is assessing current resource conditions in the climbing environment. These efforts focused upon areas affected by social trails and the flora and fauna that live in vertical ecosystems. Other efforts center upon determining to what extent fixed climbing anchors have been used in the developed zone, the backcountry transition subzone, and the wilderness subzone. These and other field data would be used to help make good decisions about restrictions or other management responses.

The National Park Service is currently conducting surveys, based upon stratified sampling methodology, which are being used to approximate the number of bolted routes present with the park. Preliminary data indicates that the number of bolted routes in Joshua Tree is approximately 3,475 and the number of bolts is approximately 7,128.

In January 1999, the National Park Service also began a project designed to examine the impacts of social trails in heavily used areas and to explore methods to mitigate those impacts. The project identifies high use areas that are heavily impacted by social trails and that would benefit from mitigation. The National Park Service installed vegetation plots to collect baseline information about vegetation diversity richness, and density. Park staff and volunteers, working with input from the climbing community, delineated access trails. The project also inventories a species of concern, rock pennyroyal (Monardella robisonii). These research projects would continue to be conducted to determine current levels of social trails, impacts on vegetation and wildlife, and the presence of bolts in park wilderness. See pages 39 and 40.

COMMENTS

The Colorado Mountain Club

710 10th St., #200 (303) 279-3080 (303) 279-9690 Fax
Golden, CO 80401 1-800-633-4417 cmcoffice@juno.com

- Although the development of the Climbing Committee is a positive step, it is unclear how many of the decisions on resource impacts, new routes, and fixed anchors will be determined solely by the Park Service instead of cooperatively between the agency, climbers, and other interest groups. 18-D

The Colorado Mountain Club believes that this Management Plan represents a positive and collaborative effort between the Park Service, climbers, and environmental interests. The preferred alternative addresses the need for providing a quality climbing experience while protecting fragile resources. While we support the Plan, we would like to see many of the elements clarified for the purpose of providing resource protection while allowing for climber opportunities and facilitating user compliance.

Sincerely,

Heide Andersen

Heide Andersen
Public Lands Policy Director

Groups: Aspen • Boulder • Denver • Denver Juniors • Denver Wilderness Kids • El Pueblo
Fort Collins • Friends of Colorado • Gore Range • Longs Peak • Pikes Peak
San Juan • Shining Mountains • Weld County • Western Slope

Colorado Fourteeners Initiative

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REMARKS

18-D – The new proposed action recognizes that working with the public to manage climbing is essential. To that end, the National Park Service would establish a Climbing Committee under the auspices of the Joshua Tree National Park Advisory Commission. The Chair of the Commission, subject to the concurrence of the Superintendent would determine the member of the Advisory Commission would chair the Committee and representatives of the climbing community, conservation organizations, and other individuals would serve on the committee. The Climbing Committee would gather information and conduct research to make recommendations to the Advisory Commission. The Advisory Commission, in turn, would provide recommendations to the Superintendent. All meetings of the committee would be announced and all meetings would be open to the public. The Superintendent, however, remains the ultimate decision-making authority about climbing management in Joshua Tree National Park. See page 41.

4311 Jackson Avenue
Culver city, CA 90232-3237
[Click here and type return address]

#8

Society for the Conservation of Bighorn Sheep

JOSHUA TREE
0 1998

December 8, 1998

Superintendent, Joshua Tree National Park

Re: Supplement to Backcountry and Wilderness Management Plan-Alternative E

Dear Sir:

My major interest is bighorn sheep. Alternative E addresses this concern positively

Nonetheless, it falls short regarding the need for maintenance and inspection of individual guzzlers is concerned and does not address the fact that due to population increase now and in the future human activity both within and without the park may make the need for additional water sources for large animals necessary.

The camping restrictions make no exception for the fact that when a crew of volunteers is needed for guzzler repairs, overnight camping will be a necessity and needs to be in close proximity of the guzzler/water source in order to obtain the maximum hours of work from these ordinary citizen volunteers for guzzler repairs, overnight camping will be necessary in close proximity to the guzzler/water source.

Volunteers usually arrive late Friday, arise just before dawn on Saturday, work hard all day and often do not complete their work until after dark. Then they return to the nearby camp and leave early Sunday morning. If volunteer camping is required at a distance from the work site, work may not be able to be completed in one day.

19-A

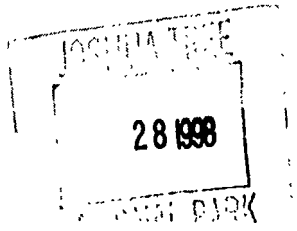
CONCLUSION: Alternative E Needs a provision allowing camping by volunteers in close proximity to guzzler sites being repaired.

Sincerely,

Irene Adam, Director
Society for the Conservation of
Bighorn Sheep

19-A – The proposed action (alternative E) has been modified to add that exceptions for camping in day use areas for the volunteers maintaining the Pushawalla and Pine City guzzlers, which are in day use only areas, would be made by the Superintendent on a base-by-case basis. See page 50.

COMMENTS



85

December 22, 1998

Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Re: Alternative E—New Proposed Action

Dear Sir:

I am writing on behalf of the Arizona Mountaineering Club, a rock climbing club whose members spend every Thanksgiving and several other weekends at Joshua Tree. We have over 430 members in our club and have enjoyed the climbing experience in Joshua Tree many times.

I have read Alternative E as printed on your web site. We support this alternative over Alternatives A-D in the Backcountry and Wilderness Management Plan (or General Management Plan). We want to continue to enjoy the climbing experience at Joshua Tree for many years to come, and want the experience to be there for future generations, while protecting the quality of the experience at the same time. We hope that the Climbing Committee concept will work well, and look forward to its implementation.

20-A

I support the other recommendations in the plan, also, with particular attention to the hiking, camping, trail use and designation, and tortoise recovery provisions.

Thank you

Wayne M Schroeter

Wayne M Schroeter
Chairman, Access Committee
Arizona Mountaineering Club

REMARKS

20-A – Comments noted.

256

425

THE WILDLANDS CONSERVANCY

February 26, 1998

Ernie Quintana
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

RE: BACKCOUNTRY AND WILDERNESS MANAGEMENT PLAN

Dear Mr. Quintana:

On behalf of The Wildlands Conservancy, I would like to urge your agency's adoption of Alternative A. Alternative A will protect sensitive natural and cultural elements while allowing for continued diverse recreational uses. The no-action alternative (Alternative B) will result in significant degradation of the Park's natural resources and will be expensive and inefficient to sustain.

I would like to encourage the development of a cooperative strategy for implementation of Alternative A. User groups should be actively encouraged to assist with the development of an implementation strategy that involves volunteers from throughout the region and the world. For example, mountain bikers can be asked to help maintain and monitor the Thermal Canyon Trail, which could easily become a major headache if not patrolled on a regular basis. Four-wheel-drive groups could help maintain and patrol Pinkham, Thermal Canyon, Berdoo Canyon, Black Eagle Mine Road and the other dirt roads in the park.

21-A

By enlisting user-group assistance in managing the Backcountry and Wilderness Areas, costs and challenges associated with the implementation of Alternative A could be reduced and public education through participation would be increased.

Once the Backcountry and Wilderness Management Plan is adopted, I would be happy to assist your staff in organizing a number of volunteer management plan implementation work parties.

Sincerely,

Shelton Douthit
Project Coordinator

21-A – Comments noted.

3961 Oak Glen Road Yucaipa, CA 92399

COMMENTS

REMARKS

January 15, 1999

Ernest Quintana, Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Dear Mr. Quintana:

The Lama Association of Southern California (LASC) hereby submits a comment about the proposed Backcountry and Wilderness Management Plan for Joshua Tree National Park. LASC is a non-profit, mutual benefit corporation incorporated under the laws of the State of California, LASC is an affiliate of the International Llama Association and LASC represents over 150 members in Southern California.

LASC proposes the following change to the language of Alternative E in the Management Plan under Stock Use: "Stock use would be ~~limited to horses and mules and~~ restricted to designated equestrian trails and corridors. ~~At the direction of the Superintendent, the use of llamas in the park could be studied in the future with the primary consideration being the protection of park resources. Future studies would be considered only after a sufficient time has elapsed to allow for plan implementation and resource data collection.~~"

22-A

This change will not adversely affect park resources because it will allow use of light pack stock such as donkeys, pack goats and llamas, all of which have less impact on park resources than heavy pack stock such as horses and mules.

Thank you for submitting this comment to record. The members of LASC are looking forward to visit Joshua Tree National Park with their animals and possibly participate in volunteer activities in the park.

Sincerely,

Pat Leighton
Board of Director President
Llama Association of Southern California
P.O. Box 876
Norco, CA 91760

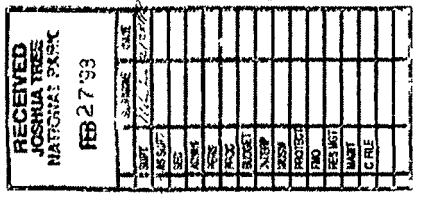
22-A – The proposed action (alternative E) remains "Stock use is limited to horses and mules and restricted to designated equestrian trails and corridors." At some point in the future, the National Park Service could study the use of llama at the Superintendent's discretion. The primary focus of the study would be the protection of park resources and consistency with the National Park Service mission. See page 32.

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1122

EAGLE MOUNTAIN

LANDFILL and RECYCLING CENTER



February 26, 1998

Mr. Ernest Quintana
Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Re: Comments on Draft EIS/Backcountry and Wilderness Management Plan for Joshua Tree National Park

Dear Mr. Quintana:

On behalf of Kaiser Ventures Inc. ("Kaiser") and Mine Reclamation Corporation ("MRC"), I am writing to submit comments on the Draft Environmental Impact Statement and Backcountry and Wilderness Management Plan ("Draft EIS") for Joshua Tree National Park ("Park"), which was distributed for public comment on November 3, 1997.

As you know, Kaiser and MRC are proposing to develop the Eagle Mountain Landfill Project ("Landfill") on the former Kaiser mine site, which is located approximately 1.5 miles from the southern boundary of the Park. While we do not intend to express a view regarding the NPS's decision about how to manage resources within the Park, we have a number of questions and concerns regarding the analysis and conclusions in the Draft EIS.

I. General Comments

A. The Draft EIS provides relatively little quantitative data to support its conclusions regarding the existing environment and the impacts of the various alternatives. Therefore, it is difficult for the reader to evaluate the factual basis for the conclusions presented in the Draft EIS.

B. The Draft EIS provides relatively little discussion of the variation in existing conditions and potential impacts within the Park, which includes more than 700,000 acres of total land and more than 500,000 acres of wilderness. Therefore, the Draft EIS creates the impression that certain conclusions apply to the Park as a whole, when in fact they apply to some specific areas within the Park and not to others.

23-A

MINE RECLAMATION CORPORATION

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23-A – Comments noted. Additional information has been added to the wilderness section of the Affected Environment to more thoroughly describe the wilderness units within the park. See pages 91 and 92.

II. Specific Comments

A. Introduction.

1. Planning Direction. The Draft EIS discusses the objectives of the California Desert Protection Act of 1994 ("CDPA") and other statutes that help to establish the management goals of the Park. Although not discussed in the Draft EIS, the final report of the House Committee on Natural Resources during consideration of the CDPA (House Report No 103-498) contained the following statement:

> The Committee recognizes that there is a proposed Eagle Mountain solid waste disposal facility which, if developed, would be located at the site of the defunct Kaiser iron ore mine within approximately 1.5 miles of the Joshua Tree National Park. It is not the intent of the Committee that this legislation have any effect on the future development of this disposal facility at that location, and does not expect that such development will be affected by the site's proximity to the park or wilderness within the park. The Committee notes that any such development will first have to meet the requirements of various federal, state, and local laws and regulations in order to be licensed; the Committee does not intend that this regulation be construed so as to impose additional regulation, beyond such current federal, state, and local laws or regulation, based on the mere fact that the Eagle Mountain site is in close proximity to the park or wilderness within the park, should this facility be located at that site.

B. Alternatives, Including the Proposed Action.

1. Redescription of 1995 GMP Zoning. The Draft EIS distinguishes between "Experience Class A" wilderness, in which a visitor "may be subject to occasional noise or visual intrusions from activities outside of the wilderness subzone," and "Experience Class B" wilderness, in which visitors "will be insulated by greater distance from activities that may interfere with a sense of solitude and primeval nature." (pp. 22-23). The purpose of this distinction is unclear, given the statement in the Draft EIS that all wilderness areas will be managed uniformly. (p. 23). Also, the application of this distinction appears to be inconsistent, since many wilderness areas along the Park's outer boundary are classified as "Experience Class B." (Figure 4). It would appear that wilderness areas along the Park's outer boundary should be classified as "Experience Class A," unless the lands immediately outside the Park are also managed as wilderness areas.

23-B

23-B – The experience classes of wilderness have been eliminated from the zoning discussion in the new proposed action. All wilderness within the park will be managed in a uniform manner. See page 22.

COMMENTS		REMARKS
2. Alternative A (the Proposed Action) defines five "management zones". These include a 100,844-acre Natural Environment Subzone (or Backcountry Transition). (Plan, p. 16.) The Plan further states that "Figure 1 shows the park zones and the zoning for the land added by the California Desert Protection Act of 1994." (Plan, p. 16.) Figure 1, in turn, contains several yellow-shaded areas defined in the legend as Backcountry Transition Subzone. However, it is not clear from the Plan whether Figure 1 shows park zones *as they now exist, or as they are proposed under Alternative 1.* Please clarify whether either or both is true.	23-C	23-C – Figure 2 depicts the zoning of the park as proposed under the new proposed action (alternative E). See page 23.
3. The Natural Environment Subzone as described in Alternative A is described as "land zoned for the conservation of natural resources and processes, but . . . not legislatively designated as wilderness." (Plan, p. 16.) Other than the lack of a legislative designation as wilderness, the Plan does not clearly explain why the 100,844 acres in this zone were so designated. Nor does the Plan explain why this acreage was not included in the Wilderness Subzone defined in the Plan. (Plan, p. 16.) There are hints elsewhere in the Plan as to the reason for the designation. For example, wilderness is described elsewhere in the Plan as "offering visitors "an opportunity to see an area free of roads, buildings, development, powerlines, and many of the visual intrusions of modern life." (Plan, p. 66.)	23-D	23-D – The new proposed action (alternative E) renames the Natural Environment Subzone as the backcountry transition subzone. The primary purpose of this zone is the preservation of natural resources and processes and only uses that have no adverse impacts would be permitted. The Backcountry Transition Subzone is that part of the Natural Zone that has not been afforded the Congressional designation of and protection as wilderness. So activities prohibited in wilderness could occur in this subzone, such as the construction or operation of minor facilities, operation of motor vehicles, landing of aircraft, etc. Since this subzone preserves natural resources, however, any proposed development would be minor. Page 21.
C. **Affected Environment.** 1 Air Quality. a. The Draft EIS states that "[v]ery small amounts of air pollutants are generated in the park and are primarily from automobiles and dust on roads. Automobile exhaust and emissions from diesel generators contribute only minor amounts of pollutants. Vehicle traffic on park roads is very light and probably only contributes slightly to particulate emissions." (p. 65-66) The Draft EIS does not contain data or analysis to support this conclusion. b. The Draft EIS states that "[w]hile natural levels of desert haze associated with fine dust particles is frequently mentioned in historical literature, there is little doubt that most current visual degradation results from human-caused sources." (p. 66) The Draft EIS does not contain data or analysis to support this conclusion.	23-E	23-E – The air quality section of the Affected Environmental has been updated to include the most recent information about the park's air quality based upon monitoring that occurred in 1997 and 1998 (pages 90 and 91). The park's *Resource Management Plan* has a project statement to evaluate the pollution of the park's night sky from lighting sources outside the park boundary. Funding has not been available for this project.

c. The Draft EIS states that "[t]he park offers a night sky unpolluted by urban lights so that visitors may see the stars as earlier generations viewed them." (p. 66) Elsewhere, the Draft EIS states, with reference to the Twentynine Palms military base, that "[o]verflights and noise from military training and night sky light pollution affect the park." (p. 70) Although not discussed in the Draft EIS, light from other sources also is currently visible within the Park at night, such as light from the existing correctional facility at the Eagle Mountain townsite. Has a quantative analysis of existing and proposed night sky lighting impacts been performed? 23-E

2. Noise.

a. The Draft EIS acknowledges that "even in the most remote places, natural quiet is broken by low-flying military aircraft." (p. 66) While accurate, this general statement does not convey the magnitude, extent, and frequency of the noise impacts associated with the U.S. Marine base at Twentynine Palms, which the Draft EIS describes as the "largest Marine base in the United States." (p. 70) 23-F

b. The Draft EIS asserts that "[q]uiet is also threatened on a more sustained basis by proposals for large-scale developments on the boundary, such as the Eagle Mountain landfill." (p. 66) The Eagle Mountain Landfill EIS/EIR modeled the noise levels associated with the Landfill and concluded that there would be no audible increase in noise levels within the wilderness areas closest to the Landfill site. Also, to the extent the Landfill results in any audible noise increases within non-wilderness portions of the Park, those noise increases will be confined to a small area. Lastly, the Landfill is not located "on the boundary" of the Park, but instead is located approximately 1.5 miles away at its closest point. 23-G

3. Regional and Adjacent Land Use.

a. The Draft EIS states, with reference to the Landfill, that "[i]ts proximity poses some obvious threats to the adjacent wilderness. Blowing trash, dust, noise, and odors could impair the fragile setting." (p. 70) The Draft EIS does not contain any data or analysis to support the conclusion that these types of impacts will pose "obvious threats," nor does it acknowledge that the NPS has recognized in writing that these types of impacts will be mitigated to insignificance. There is no quantitative discussion of impacts from other landfills or private industry surrounding the Park. 23-H

23-F – The National Park Service and the U.S. Navy are finalizing an environmental assessment and finding of no significant impact to relocate VR-1257, the most heavily used military training route over the park. The VR and IR military aviation training routes that overlay the park are not administered by the Marine Corps Air Ground Combat Center in Twentynine Palms. Noise associated with training on the Marine Corps facility usually involves ground-detonated ordnance. This generates noise events within the communities to Twentynine Palms, Joshua Tree, Wonder Valley, and along the northern boundary of the park. These same noise impacts do not reach the central or southern reach of the park. Specific reference to the Marine Corps facility has been removed from the plan.

23-G – Comments noted.

23-H – Comments noted.

COMMENTS		REMARKS
b. The Draft EIS states, with reference to the Landfill, that "[t]he operations could present other, less obvious, threats to the natural ecosystem. Household trash attracts scavengers such as ravens and coyotes, which can flourish in such a setting." (p. 70) The Draft EIS does not contain data or analysis to support this conclusion, nor does it acknowledge that the NPS has entered into a binding agreement with MRC, which establishes and funds a long-term monitoring and mitigation program that will be carried out by MRC with the NPS's involvement to address any long-term, unforeseeable impacts of the Landfill.	23-I	23-I – Comments noted.
c. The Draft EIS states that "[t]he largest known population of tortoises within the park is within 6 miles of the landfill." (p. 70) The Draft EIS does not identify this population, nor does it explain the scientific basis, if any, for assuming that the Landfill has the potential to impact this population of ravens. Why has the NPS not made background monitoring data available to the public for review? Furthermore, the Draft EIS does not acknowledge that the U.S. Fish and Wildlife Service has issued a Biological Opinion for the Landfill, which concludes that the Landfill will not jeopardize the desert tortoise.	23-J	23-J – Comments noted. A map identifying critical habitat and desert tortoise locations has been included in the new proposed action. See page 55.
d. The Draft EIS states, with reference to the Twentynine Palms military base, that "[o]verflights and noise from military training and night sky light pollution affect the park." (p. 70) While accurate, this general statement does not convey the magnitude, extent, and frequency of the noise impacts associated with the U.S. Marine base at Twentynine Palms, which the Draft EIS describes as the "largest Marine base in the United States." (p. 70)	23-K	23-K – Comment noted. Specific reference to the Marine Corps Air Ground Combat Center has been removed from the plan.
e. The Draft EIS states that "[u]rbanization and incompatible land uses along the boundary can cause profound deterioration of resources." (p. 70) The Draft EIS does not explain whether this statement is intended to refer to land uses that actually exist along the park's boundary, or simply to potential future land uses, nor does it specifically identify the adjacent land uses that are believed to cause the types of impacts identified in the Draft EIS.	23-L	23-L – Comments noted.
4 Visitor Use		
a. The Draft EIS states that "[a]nnual visitation surpassed 1.2 million in 1995. . . . If visitation continues to increase at the same rate, the total could reach 3 to 4 million over the next 10 to 15 years." (p. 71) The Draft EIS does not explain whether this growth forecast, or some other growth forecast, has been used in evaluating the environmental impacts associated with an increase in the number of Park users.	23-M	23-M – This projection of park visitation has been removed from the description of the affected environment.

b. The Draft EIS states that "[d]espite the fact that Joshua Tree is largely a front country day use destination for most visitors, backcountry use also has increased in recent years (recorded by backcountry camper nights)." (p. 71) The Draft EIS does not provide any data to document or explain these conclusions – e.g., the number of park visitors who use the front country areas compared to the number who use backcountry and wilderness areas, the increase or decrease within each category of users in "recent years," and the distribution of backcountry users among the various backcountry and wilderness areas within the Park. 23-N

5. Wilderness / Nonwilderness Use.

a. The general description of "wilderness" in the Affected Environment chapter of the Plan says that "Wilderness offers solitude, tranquility, quiet contemplation, and freedom to study a place that is substantially unaffected by human activity." (Plan, p. 66.) Meanwhile, the chapter entitled Purpose and Need For the Plan states that in wilderness "the imprint of human activities is substantially unnoticeable", and the chapter on Alternative A describes wilderness as "an area . . . retaining its primeval character and influence, without permanent improvements.'" (Plan, pp. 6, 43.) To the extent that such descriptions have been used either to define lands as wilderness or, in the alternative, to exclude lands from such a definition, please explain how this was done. In particular, please explain how values such as "solitude", "tranquility", and "quiet contemplation" are measured for the purposes of making the wilderness/non-wilderness determination. 23-O

b. The Affected Environment chapter of the Plan does not provide any detail concerning the existing physical conditions in the areas defined in the various alternatives as "nonwilderness" and/or Natural Environment Subzone. In particular, it does not state the present zoning or other rules and regulations subject to nonwilderness lands. It also does not identify existing roads or so-called "dirt tracks", or any of the MWD facilities referenced elsewhere in the Plan. Finally, while there is a brief discussion on page 71 indicating that new land added in 1994 has been used by four-wheel drive vehicles, the Plan does not describe in any more particularized nature the actual use of the nonwilderness portion of the new land. Given that these lands are widely dispersed and isolated from each other, a more specific discussion is warranted. 23-P

23-N – This information was obtained from the number of permitted overnight backcountry stays. Records are maintained in the Visitor Protection Division.

23-O – Prior to being designated as wilderness by Congress, undeveloped Federal lands, which are at least 5,000 acres and possess the characteristics described in the Wilderness Act, are evaluated for their suitability for wilderness. The characteristics include:

- The earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain;
- It retains its primeval character and influence, without permanent improvements or human habitation;
- It generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable;
- It is protected and managed so as to preserve its natural conditions; and
- It has outstanding opportunities for solitude or a primitive and unconfined type of recreation.

Lands and waters found to possess the characteristics and values of wilderness, as defined in the Wilderness Act and determined suitable pursuant to the wilderness suitability assessment, will be formally studied to develop the recommendation to Congress for wilderness designation. Wilderness studies are supported by the appropriate documentation of compliance with the National Environmental Policy Act and the National Historic Preservation Act.

23-P – Refer to 23-D. The management prescriptions of the park's backcountry are described in the new proposed action (alternative E). The primary distinctions between the wilderness and backcountry transition subzones for the eight primary issues discussed in the *Backcountry and Wilderness Management Plan* occur in the climbing management and groups size limit discussions. Unless otherwise stated, the rules and regulations that apply to wilderness also apply to the backcountry transition subzone.

234

6. Roads.

The Plan is ambiguous as to the status of roads already existing in the Natural Environment Subzone. The description of the zone in Alternative A indicates that "the National Park Service could . . . operate motor vehicles . . . and engage in other activities that are prohibited in wilderness." (Plan, p. 16.) This implies that under this alternative, the Park Service, *but not the public*, would be allowed use motor vehicles on these lands. However, elsewhere the Plan indicates that under Alternative A the roads in the Natural Environment Subzone would be open to the public. It states that "This alternative would designate 36.9 miles of eight roads on the land added to the park in 1994 as open to the operation of motor vehicles." (Plan, p. 35.) The text in Alternative A, along with Figure 6, elaborates by describing and mapping particular road segments which apparently run through the Natural Environment Subzone, such as Berdoo Canyon Road, Powerlines Roads east and west, and Eagle Mountain Road. (Plan, p. 35 and Figure 6.) The text then states that "the public could operate motor vehicles only on designated roads and parking lots. . . . This alternative would afford a driving experience that is not found elsewhere in the park." (Plan, p. 36.) Please clarify whether the roads in the Natural Environment Subzone would be open to the public.

23-Q

23-Q – Refer to figure 7 on page 37. The roads that the new proposed action (alternative E) recommends being open to the public are depicted in blue. They clearly travel through the backcountry transition subzone.

D. **Environmental Consequences.**

1. Derivation of Impact Topics.

a. The Draft EIS acknowledges that the impact topics were "narrowed to include only those of significant environmental concern. Not analyzed for impacts were climate, natural hazards, biosphere reserve status, external land use, water quality, and water rights where the alternatives would have little or no impact." (p. 75) The Draft EIS does not explain the basis for concluding that the alternatives would not have significant impacts in any of these areas.

23-R

23-R – Comments noted.

b. The Draft EIS states that "Dust from park roads is not significant in comparison to the regional air quality issues. Although visitation is expected to increase, no proposals under any alternative would significantly alter air quality. Impacts to the surrounding communities from the proposed actions in this plan would be minimal and are not further analyzed." (p. 75) This statement assumes that the number of Park visitors could increase from 1.2 million visitors to approximately 3-4 million visitors (a threefold increase) without having any impact on air quality.

23-S

23-S – Visitation has increased over the past several years with 1996 being the exception. The pattern for 1999 is projected to show a decrease in visitation from the 1998 levels. Park air quality monitoring equipment indicates that the park's air quality is primarily being impacted by ozone concentrations and not from dust particulates.

However, this assumption is not supported by data or analysis in the Draft EIS. For example, the Draft EIS does not estimate the increase in air emissions that will result from the predicted increase in visitors to the Park (i.e., 3-4 million visitors per year) and then calculate the effect of that increase on ambient levels of the relevant pollutants.

c. The Draft EIS appears to assume that the increase in visitors to the Park over the next 10-15 years will be the same regardless of the alternative that is selected. Based on this assumption, the Draft EIS assumes that all of the alternatives would have the same air quality impacts. An alternative approach would be to assume that the number of visitors does depend on the alternative selected – e.g., that the number of visitors would be higher under the Minimum Requirements alternative (which loosens restrictions on access) than under the Maximum Protection alternative (which tightens restrictions on access). The Draft EIS does not explain the basis for assuming the visitor levels would be identical under all alternatives. 23-T

2. Impacts on Visitor Enjoyment.

a. The Draft EIS describes the impacts of the various alternatives on visitor use and experiences solely in qualitative terms, without using and referencing the NPS's Visitor Experience and Resource Protection ("VERP") system. (pp. 79-80) The decision not to employ the VERP appears to confirm that, while the NPS may continue to use the VERP for certain purposes, it does not consider it necessary to employ the VERP or any other formal methodology when preparing an EIS for its own proposed actions. 23-U

b. The Draft EIS states that the effects on visitor use and experiences can be divided into three categories: (1) visitor enjoyment of the park, (2) visitor distribution throughout the park, and (3) visitor participation in recreational experiences. (p. 79) Although the Draft EIS discusses the various types of activities that would be allowed or prohibited in different zones and sub-zones under the various alternatives, it does not specifically address these three factors. In particular, the Draft EIS does not make any prediction about how these alternatives would affect the distribution of visitors throughout the Park. 23-V

Thank you for your consideration of these comments

Sincerely,

Gary W. Johnson @1

Gary W. Johnson, Vice President
Landfill Development

23-T – Predictions of future visitation have been eliminated from the discussion of visitor use in the Affected Environment section.

23-U – Although the *Backcountry and Wilderness Management Plan* does not follow a template prescribed by the Visitor Experience Resource Protection (VERP) process, the National Park Service considered and used many of the principles of VERP in the development of the plan. The VERP process was used in developing the zoning description, the proposed standards of use and quality indicators that were intended to reinforce management objectives and themes described in the draft *General Management Plan.*

23-V – Comments noted.

The National Park Service received 183 written comments that addressed the new proposed action (alternative E). As with the Draft General Management Plan Amendment/Environmental Impact Statement, the majority of the comments addressed climbing management. Many of the comments expressed their support of the new proposed action. A representative sampling of those letters received from individuals follows.

Thirty-four of the comments addressed the new route bolt cap. "The establishment of a "cap" on new bolted routes is not needed." "The "cap" on routes seems vague." "The "cap" on new bolted routes that will be allowed in any year has yet to be determined." "Why is there a "cap" on new bolted routes?"

The objectives of the plan are to keep the cumulative impacts of climbing in the non-wilderness areas of the park to acceptable levels and to keep the cumulative impacts of climbing in wilderness to levels at or below 1998 conditions. The Council of Environmental Quality (CEQ) regulation (1502.2) provides for developing a plan when information is incomplete or unavailable. Additional language that describes the process the National Park Service is using to obtain the needed information has been added in the introduction to the climbing management section of the plan on pages 39 and 40.

Some of the specific numbers needed to quantify 1998 conditions were unknown at the time the supplement was prepared. In 1999, however, the National Park Service initiated steps to obtain baseline information to gauge what the 1998 impact levels were. Initial surveys focus on determining the amount of land effected by social trails, identification of flora and fauna that live in the vertical ecosystems, and determining to what extent permanent fixed anchors are used in the developed zone and backcountry transition and wilderness subzones. The National Park Service is currently conducting surveys, based on stratified sampling methodology that will be used to approximate the number of bolted routes that are present within Joshua Tree National Park. Preliminary data indicates that there are approximately 3,475 bolted routes in the park and approximately 7,128 bolts. This approximated number will be used as a target goal and will be used by the National Park Service and the Climbing Committee in evaluating requests for new bolted routes.

Eighteen comments claimed that the new proposed action (alternative E) was generally vague and nine stated that the new proposed action leaves too many of the details undetermined. "Some of the new climbing rules are too vague." "There are areas within the document that I have reviewed which are either vague, or are open to subjective interpretation." "I do have to mention that certain lack of detail in the plan alarms me."

Because the National Park Service is interested in receiving recommendations and advice from the Climbing Committee on some of these issues, portions of the plan were intentionally left unspecific. The Climbing Committee cannot be established until a record of decision is signed, and so some of these decisions will not be made until the National Park Service receives the advice and recommendations of the Climbing Committee.

Sixteen letters questioned the desire to leave impacts at or below 1998 levels. "There is mention of 1998 level of climbing impact and the guideline to remain under this level. However, there is no detail on what this level is." "The phrasing of 'keeping the cumulative impacts at or below 1998 levels' also has me concerned. The plan does not clearly define criteria and number of new routes, particularly those in wilderness areas."

The National Park Service Organic Act directs the Service to preserve park resources "unimpaired," while providing for the public enjoyment of those resources. Because public enjoyment cannot be sustained if park resources are damaged or compromised, resource protection must necessarily be the Service's paramount responsibility. The National Park Service must manage recreational activities and settings to protect park resources, provide for public enjoyment, promote public safety, and minimize conflicts with other visitor activities and park uses.

The Council of Environmental Quality (CEQ) regulation (1502.2) provides for developing a plan when information is incomplete or unavailable. Additional language that describes the process the National Park Service is using to obtain the needed information has been added in the introduction to the climbing management section of the plan on pages 39 and 40.

Some of the specific numbers needed to quantify 1998 conditions were unknown at the time the supplement was prepared. In 1999, however, the National Park Service initiated steps to obtain baseline information to gauge what the 1998 impact levels were. Initial surveys focus on determining the amount of land effected by social trails, identification of flora and fauna that live in the vertical ecosystems, and determining to what extent permanent fixed anchors are used in the developed zone and backcountry transition and wilderness subzones. The National Park Service is currently conducting surveys, based on stratified sampling methodology that will be used to approximate the number of bolted routes that are present within Joshua Tree National Park.

There are many climbing routes already established in the park's wilderness. The number of bolted routes in wilderness is less important than the cumulative levels of resource impacts associated with climbing those routes. Wilderness is a finite resource, however, and continued unregulated placement of bolts in Joshua Tree National Park's wilderness is unsustainable. Existing bolted routes would not necessarily have to be removed before additional bolted routes can be established in wilderness. No new bolted routes would be permitted if they would increase the cumulative levels of impacts to the wilderness resource beyond those estimated for 1998.

Fifteen of the letters discussed the evaluation of bolted route prescriptions in wilderness. "The criteria that must be satisfied before you would issue a permit for a new bolted route in wilderness is only partially defined at this point." "What is your position about new bolted routes in the wilderness?" "I am concerned that there are no objective criteria for determining whether a new route with fixed anchors will or will not be allowed."

This plan aims to keep the cumulative impacts of rock climbing in Joshua Tree wilderness at or below 1998 levels. See pages 43 and 44. Research projects initiated in 1999 would continue to be conducted to determine current levels of social trails, impacts on vegetation and wildlife, and the presence of bolts in park wilderness.

There are many climbing routes already established in the park's wilderness. The number of bolted routes in wilderness alone is less important than the cumulative levels of resource impact associated with climbing those routes. Wilderness, however, is a finite resource, and continued unregulated placement of bolts in Joshua Tree National Park's wilderness is unsustainable. Existing bolted routes would not necessarily have to be removed before additional bolted routes can be established in wilderness. No new bolted routes would be permitted if they would increase the cumulative levels of impacts to the wilderness resource beyond those estimated for 1998.

The National Park Service must approve and issue a permit for new bolted routes in wilderness. The National Park Service would determine if additional routes that require fixed anchors were justified. The Climbing Committee would work with the National Park Service to more formally describe the criteria, which must be satisfied, before a new bolted route can be approved and a permit issued.

Climbers wishing to establish new bolted routes in wilderness would present an application to the Climbing Committee, which would review and make a recommendation for the Advisory Commission to submit to the Superintendent for approval or denial. Park staff would review the proposal for consistency with other management objectives and would ascertain that the new route would not conflict with sensitive resources and the preservation of wilderness character. Most importantly, the proposal would be evaluated in terms of its potential to increase or reduce the cumulative impacts of climbing in the wilderness. If all the relevant criteria are satisfied, the superintendent would issue a permit for the new route. While the Climbing Committee would play an important role in reviewing proposed new routes, the National Park Service retains the sole responsibility for issuing permits.

Before issuing a permit, the National Park Service would review any new route proposal to determine:

- that the proposed route has the potential to enhance the user's ability to experience a primitive and unconfined type of climbing experience that is consistent with an encounter with wilderness,
- that the proposed route does not have potential to lead to resource impacts,
- that the proposed route does not conflict with the protection of wilderness values,
- that the proposed route has minimal impact on the experience of other wilderness visitors, and
- that the proposed route is an independent line, suitably distant from existing routes, or a variation to an existing line that provides an exceptional climbing experience.

These and any additional criteria would have to be met prior to approving the placement of new fixed anchors.

Fourteen letters requested clarification about the routes that may cause social conflicts in wilderness. "What constitutes an 'infringement on the wilderness experience of others of wilderness character' has yet to be defined by Park Service to prompt the removal of established routes in wilderness." "Who will decide which 'routes that cause social conflicts or otherwise intrude on the wilderness character would be camouflaged or removed?"

In conjunction with the Climbing Committee, the National Park Service would evaluate all bolted climbing routes in the wilderness for appropriateness and for impacts to the resource and wilderness experience. Fixed anchors, which are determined to be highly visible, too close to sensitive resources, or in other ways degrade the wilderness experience, would be camouflaged or removed.

Thirteen letters requested additional information about the process for monitoring new route activity or placement of new bolts in nonwilderness. "What is the procedure for establishing new bolted routes in non-wilderness areas?" "What will the permit application process be?" "The interim permit requirement for new bolted routes in non-wilderness, the yet-to-be-determined process for monitoring new routes...all are only partially defined at this point."

Placement of new fixed anchors in the developed zone and backcountry transition subzone would be allowed, except where explicitly prohibited, under an established monitored process that requires climbers to report their intent to place new bolts to the National Park Service. See pages 41 to 43. The Climbing Committee, working within National Park Service parameters, would establish a process for monitoring the placement of new bolts. This process would promote climber education and self-regulation. The National Park Service would complete the inventory of climbing impacts within one year of the adoption of this plan and would identify areas where additional bolts would conflict with other park values or management objectives.

Under the monitored process, new bolted routes in the developed zone and the backcountry transition subzone would not require a permit, but the climber wishing to place additional bolts must complete a checklist of criteria that would be developed by the Climbing Committee. The checklist would require the climber to consider the potential impacts of new bolts on park resources and the experience of other visitors. A positive response to each of the criteria to be evaluated in the checklist would be considered implied approval for placing new fixed anchors. In essence, this is an honor system and would encourage climber investment in park management objectives and priorities.

This checklist may be picked up and, once completed, dropped off at any entrance station, the visitor center, or with a National Park Service employee. It would be forwarded to the Climbing Committee. The Climbing Committee would work with the National Park Service to monitor the rate and locations of new fixed anchor placements to ensure that impacts do not reach unacceptable levels.

While the National Park Service completes the inventory of climbing impacts, there would be a 1-year period during which a permit would be required before new bolts could be placed in the developed zone and the backcountry transition subzone. During this interim period, proposals for new bolted routes must be submitted to the Superintendent, who would work with the Climbing Committee to evaluate them based on the criteria developed for the checklist. As part of a proposal to place new bolts during this interim period, the climber must also complete and submit the checklist, which would verify that all criteria for new bolt placements are adhered to.

Following the 1-year interim period, the National Park Service and the Climbing Committee would assess the resource impacts that are related to existing bolted routes. This information would be used to establish an acceptable rate of expansion for new bolted routes, as well as any formal process by which new routes must be approved.

Seven letters expressed concern about the composition of the Climbing Committee or how it would be organized and work. "I am confused about the committee. How many people will comprise the committee? How will they be chosen? How often will they convene? What are the powers of the committee?" "How long after the adoption of the new plan until the formation of the Climbing Committee. There are concerns as to whether or not such a Committee, once formed, would serve any purpose other than good press for the NPS?"

Alternative E recognizes that working with the public to manage this activity is essential. To that end, the National Park Service would establish a climbing committee under the auspices of the Joshua Tree National Park Advisory Commission, established by section 407 of the California Desert Protection Act, to function as a subcommittee of the Commission. The charter of the Joshua Tree National Park Advisory Commission provides for the creation of subcommittees from among its membership that can be supplemented, when appropriate, by members of the public. The Chair, subject to the concurrence of the Designated Federal Officer (the park superintendent), would determine the membership of the subcommittee.

A sitting member of the Advisory Commission would chair the Committee and representatives of the climbing community, conservation organizations, and other individuals would serve on the Committee. The Committee would function under the direction of and within the parameters established by the National Park Service to provide recommendations regarding the climbing management program.

The Climbing Committee would gather information and conduct research to make recommendations to the Advisory Commission. The Advisory Commission, in turn, would provide recommendations to the park superintendent. The Climbing Committee would meet the requirements of the Federal Advisory Committee Act (PL 92-463) and its implementing regulations, 41 CFR 101-6.10. All meetings of the Committee would be announced open to the public. The Superintendent, however, remains the ultimate decision-making authority about climbing management in Joshua Tree National Park.

Three letters commented on the fixed anchor-free zone. "The bolt free zones make no sense to me. A map delineating the zones would be helpful." "The plan provides a general description of fixed anchor free zones, ending with '...rock formations which form corridors along washes providing access to the Wonderland of Rocks from Barker Dam..."

This zone shall preserve some areas of the park as completely unaffected by the presence of fixed anchors. No type of fixed climbing anchor would be placed. All existing fixed anchors in these areas would be removed. The National Park Service would work with the Climbing Committee to develop a timetable to remove fixed anchors and to publicize the restrictions on climbing in this zone.

When evaluating an area for designation as a fixed anchor free zone, the following would be considered:

- benefits to visitor experience,
- protection of natural, cultural, and scientific resources,
- popularity and historic use of the area to climbers,
- concentration of established routes in the area and potential for new route exploration,

- uniqueness of the rock formations,
- sensitivity of resources, and
- conflicts with other user groups.

Fixed anchor free zones include the Coxcomb Mountains; the Little San Bernardino Mountains (excluding that portion of the range directly east of Covington Flat); the Hexie Mountains (excluding the Stirrup Tank area); the Cottonwood area and other areas east of the Pinto Basin Road; the Pinto Mountains (excluding the areas around Belle and White Tank Campgrounds); and rock formations which form the corridor along the Nature Trail providing access from the parking lot to Barker Dam (not including major formation that are merely visible from Barker Dam Nature Trail).

A map of the fixed anchor free zones has been added to the new proposed action (alternative E) as figure 8.

One letter asked for a description of the interim permit requirement.

While the National Park Service completes the inventory of climbing impacts, there would be a 1-year period during which a permit would be required before new bolts could be placed in the developed zone and the backcountry transition subzone. During this interim period, proposals for new bolted routes must be submitted to the Superintendent, who would work with the Climbing Committee to evaluate them based on the criteria developed for the checklist. As part of a proposal to place new bolts during this interim period, the climber must also complete and submit the checklist, which would verify that all criteria for new bolt placements are adhered to.

One letter requested the criteria for the use of power drills. "On what basis will the Superintendent decide to issue permit? Will anyone be able to obtain a permit? How long will it take to obtain a permit?"

Power drills are prohibited in wilderness. Only requests for the use of a power drill in the developed zone or the backcountry transition subzone will be considered.

272

December 17, 1998

1 8 1998

NAT

Mr. Ernest Quintana, Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, California 92277

44

RE: Backcountry and Wilderness Management Plan
Supplement to the Draft
Figure 5 - Trails and Corridors

Dear Mr. Quintana,

This letter is written to address an established trail that appears to be deleted from the supplement to the Draft. The trail in question is described as follows:

West Entrance Area
First trail to the North of the Entrance Facility
Follows contours of the valley East, North of Park Boulevard
Crosses minor saddle North to South
Connects to the North Side Trail
North side Trail East to proposed staging area.
(see attached map - yellow highlighted trail)

The Park is aware that the approved Burro Trails are highly desired by visitors and access to those trails is limited. Under the current proposal the easy access route would leave the proposed staging area and travel West via the North Side Trail and would have to cross Park Boulevard (Route 12) twice. Safety is a major concern.

Using a topographical map, the deleted trail's value is very apparent. This trail truly ensures visitors safe access to and from the Burro Trails.

All of those who use and would use this established trail will appreciate full consideration and approval of this particular trail in the final Management Plan. 24-A

Thank you for your prompt attention.
Sincerely yours,

Norma L Gardner

P.O. ~~Box~~ 117
Yucca Valley, Ca 92284

24-A – This trail has been added to the designated trail network.

22 1998

Frank Buono
Box 562
Prineville, Oregon 97754

December 15, 1998

Superintendent,
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Dear Superintendent

I offer the following comments on the Supplemental Environmental Impact Statement (EIS) for the Backcountry and Wilderness Management Plan for Joshua Tree National Park.

I generally endorse Alternative E as the Proposed Action Alternative and urge that the National Park Service (NPS) adopt it **EXCEPT** for the proposed language on climbing and artificial water sources for wildlife.

1. Artificial Water Source (pages 33-37)
Alternative E, the Proposed Action Alternative contains a subtle but significant shift from Alternative A on artificial water sources (guzzlers) for wildlife. The new Alternative E language does not conform to NPS policy on native animal management.

NPS policy permits artificial means of wildlife support for species listed under the Endangered Species Act and for other species of concern that may decline below a stable population. NPS policy also allows artificial wildlife support for re-creating or simulating a natural feature (e.g. a spring) or natural process (e.g. a migration corridor) that are no longer present because of human activity (See NPS-77 Natural Resources Management Guideline, pages 32 and 33).

Alternative A (page 43 of the Draft GMP) proposes that the NPS study all guzzlers in the park and subject them to the NPS policy. The study would first determine if the guzzler were actually supporting a bighorn population and the population were dependent upon it. Alternative A states .

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"If the water source is not supporting wildlife OR is not replacing a natural source that has been altered disturbed or destroyed by human...activities, the artificial water source would be removed." Alternative A thus provides two bases upon which to remove a guzzler.

In contrast, Alternative E states (on page 36) "If the water source supports wildlife or does replace a natural source that has been altered, disturbed or destroyed by human...activities, the artificial water source could remain." Alternative E thus provides two bases for maintaining a guzzler.

The Supplement shifts from the negative phrasing of Alternative A to the positive phrasing of Alternative E. That shift may be responsible for establishing two distinct bases for maintaining guzzlers instead of two distinct bases for removing them. This result may be intentional or inadvertent. In any case, Alternative E would maintain guzzlers for two reasons: if animals were dependent upon them OR if the guzzler is replacing a human perturbation of the natural system. The second reason falls within NPS policy. The first reason, animal "dependence," does not.

Grizzly bears were dependent on the artificial food sources provided by NPS-operated garbage dumps in Yellowstone National Park. Yet, in the late 1970's the NPS closed the dumps. That NPS decision was a bold move taken in the face of heavy criticism from animal advocates and research scientists alike. However, that NPS decision was NPS policy.

In short, maintaining artificial food or water sources only because an animal population is dependent upon it is insufficient justification and contrary to NPS policy. Whether Alternative E has adopted that position intentionally to placate public comment or inadvertently, only the authors know. In either case, Alternative E needs to be redrafted.

I suggest the following language:
"The NPS may allow the continued existence of currently functioning artificial water sources if such a source is documented in the resource management plan as necessary to maintain or increase a federally listed threatened or endangered species or may help to prevent a species of concern, e.g. the desert bighorn sheep, from declining

25-A

25-A – The suggested language has been inserted in the text. Refer to the Artificial Water Sources section of Alternative E pages 49-51.

below a stable population. The NPS may also allow such water sources if they are simulating natural features (e.g a spring or seep) or natural processes (e.g. migration) that have been altered or destroyed by human activities including mining, water pumping, road construction or fencing; otherwise the source could be removed."

The above would replace the third sentence of the second full paragraph on page 36.

2. Climbing (pages 27 to 33)

Please forgive me for my blunt comments on climbing. There are possible avenues of compromise on this issue. Alternative E attempts to advance one possible compromise However, it is so incomplete, poorly drafted and roughly worded that it hardly passes muster of the National Environmental Policy Act (NEPA), the Organic Act and the Wilderness Act. Alternative E can be greatly improved if it addresses the following defects.

The climbing portion of Alternative E is defective in many respects because:

- The alternative fails to adequately describe the base line conditions of 1998. The Plan refers to such conditions on page 30 but does not provide any data that quantifies those conditions.

  The Alternative does not describe the proposed action in any detail. The alternative states on page 30 that the NPS will allow "only a limited number of new bolted climbing routes per year" in wilderness. What is the limit? How many such routes may be approved and where will they be? The details are absolutely and completely lacking from Alternative E.

- The Alternative does not fulfill NEPA **regulations** that require that an Environmental Impact Statement (EIS) discuss the "environmental consequences" of the alternatives, including the proposed action (40 CFR 1502.16). Since the Alternative fails to describe the baseline conditions and fails to detail the actions that may be proceed from adopting the Alternative, the EIS, cannot and does not discuss the environmental consequences of its adoption.

25-B

25-B – The objectives of the plan are to keep the cumulative impacts of climbing in the non-wilderness areas of the park to acceptable levels and to keep the cumulative impacts of climbing in wilderness to levels at or below 1998 conditions. The Council of Environmental Quality (CEQ) regulation (1502.2) provides for developing a plan when information is incomplete or unavailable. Additional language that describes the process the National Park Service is using to obtain the needed information has been added in the introduction to the climbing management section of the plan on pages 39 -41.

Some of the specific numbers needed to quantify 1998 conditions were unknown at the time the supplement was prepared. In 1999, however, the National Park Service initiated steps to obtain baseline information to gauge what the 1998 impact levels were. Initial surveys focus on determining the amount of land effected by social trails, identification of flora and fauna that live in the vertical ecosystems, and determining to what extent permanent fixed anchors are used in the developed zone and backcountry transition and wilderness subzones. The National Park Service is currently conducting surveys, based on stratified sampling methodology that will be used to approximate the number of bolted routes that are present within Joshua Tree National Park. Preliminary data indicates that there are approximately 3,475 bolted routes in the park and approximately 7,128 bolts. This approximated number will be used as a target goal and will be used by the National Park Service and the Climbing Committee in evaluating requests for new bolted routes.

COMMENTS

- For the above reasons, the Supplement for Alternative E does not constitute environmental compliance as mandated by NEPA. Yet Alternative E fails to inform the public of how and when the NPS will conduct NEPA (if at all) prior to issuing permits for new bolted routes in wilderness.

- The Supplement fails to describe the "cumulative impacts" that will arise from Alternative E and the issuance of permits for new bolted routes in wilderness. How can it? The Supplement itself lacks a single shred of detail about the number, location, length, concentration or phasing-in of new bolted routes. How can the NPS assess the cumulative impact of actions that it does not yet know it will take? The answer is simple. The Supplement does not provide any assessment of cumulative impacts. A statement that gives lip service to cumulative impacts (pages 29 and 30) is no substitute for an analysis of cumulative impacts. 25-C

Alternative E is hollow. It contains no explanation of the proposed action, no analysis of the effects, and no description of the baseline conditions. The alternative is wrapped in words that explain only how the NPS will implement the alternative and equally hollow assurances from the NPS.

I have listed above only the NEPA defects of Alternative E, the Proposed Action Alternative. Mined Land Reclamation, Inc. produced an EIS for the proposed Eagle Mountain Landfill that contained far more detail about impacts to Joshua Tree's resources than does the NPS Alternative E. The environmental community found the EIS to be deficient. It would be a strange yardstick that measures Alternative E as acceptable, when it suffers from even greater deficiencies than Eagle Mountain's EIS. The NPS and the environmental community cannot safely be concerned ONLY with impacts arising from external sources while it ignores or even fosters impacts arising under NPS control.

Organic Act

Alternative E ignores the Organic Act of the National Park Service by valuing recreational pursuits more importantly than the preservation of resources. In the very recent Federal court decision of June 23, 1998 (Southern Utah Wilderness Alliance v. Dabney), the District Court for Utah rejected the NPS argument that the Organic Act compels the NPS to balance "between competing mandates of resource 25-D

REMARKS

25-C – There are many climbing routes already established in the park's wilderness. The number of bolted routes in wilderness is less important than the cumulative levels of resource impacts associated with climbing those routes. Wilderness is a finite resource, however, and continued unregulated placement of bolts in Joshua Tree National Park's wilderness is unsustainable. Existing bolted routes would not necessarily have to be removed before additional bolted routes can be established in wilderness. No new bolted routes would be permitted if they would increase the cumulative levels of impacts to the wilderness resource beyond those estimated for 1998. Also see 25-B.

25-D – The National Park Service recognizes its responsibility to resource protection and has added the following language to the introduction of the Visitor Experience section of the new proposed action (Alternative E). The National Park Service Organic Act directs the Service to preserve park resources "unimpaired," while providing for the public enjoyment of those resources. Because public enjoyment cannot be sustained if park resources are damaged or compromised, resource protection must necessarily be the Service's paramount responsibility. Within that constraint, the National Park Service must manage recreational activities and settings to protect park resources, provide for public enjoyment, promote public safety, and minimize conflicts with other visitor activities and park uses. The Service is directed to monitor recreational activities and assess their potential impacts on park resources. When there is potential for adverse impacts, the service will initiate an appropriate policy or regulations response to prohibit or control the activity and avoid the adverse impacts. Therefore, the Service should not wait until a use becomes a significant impact, but should take a proactive stance to prevent degradation to resources, an adverse impact on wildlife, or diminishment of other visitors' enjoyment from occurring. See page 28.

conservation and visitor enjoyment." The court rejected the NPS argument that the courts must grant considerable deference to NPS decisions that are a "reasonable accommodation of the conflicting mandates" of the Organic Act. Normally, the courts give strong deference to an agency interpretation of its statutes. Here, the Federal court rejected the NPS interpretation of the Organic Act. Instead, the court stated that "the Park Service's mandate is to permit forms of enjoyment and access that are *consistent* with preservation and *inconsistent* with significant, permanent impairment."

In a deadly blow to the bogus NPS argument of "conflicting mandates," the Federal court wrote ""visitor enjoyment" as used in the statute (Organic Act) refers to visitor enjoyment of park scenery, wildlife, and natural and historic objects that are to be preserved. As used in this (the Organic Act) sense, visitor enjoyment does not refer to visitor enjoyment of outdoor recreational activities."

Thus, enjoyment that impairs park resources is not authorized by the Organic Act. It is admittedly debatable whether the placement of a single fixed anchor for climbing constitutes "impairment." However, there can be no serious debate about whether placement of thousands of fixed anchors in hundreds of routes, constitutes "impairment." It clearly does.

The NPS is obligated by law to provide for the "enjoyment" of park resources. But, the NPS is obligated to permit **only** that enjoyment which leaves park natural and cultural features "unimpaired" for present and future generations. Thus, the parks are not simply an entertainment venue, like a theme park, in which all forms of enjoyment are allowed. Some forms of enjoyment of park resources are precluded. Inappropriate enjoyment includes those forms of enjoyment that impair resources. What is "to impair"? Impair means to diminish, damage, injure, mar or blemish. Does the permanent placement of a bolt in a pristine rock face do any of the above?

<u>Wilderness Act</u>

I agree that the NPS may find a possible compromise under which the managers of Joshua Tree National Park MAY issue permits for new bolted climbing routes even in wilderness. The NPS must treat such requests the same way that the NPS would treat a request by a hiking group or an equestrian

25-E

25-E –A more thorough discussion of wilderness, prohibitions in wilderness, and the exceptions to those prohibitions for the administration for the purpose of the Wilderness Act has been added to the wilderness subzone section on page 22. The permanent installation of bolts in wilderness may be considered an exception to the prohibition of permanent installations in wilderness if the bolts contribute to the administration of the area for the purpose of wilderness. Trails through wilderness can provide for user safety and confine impacts to defined areas as they provide access through wilderness and provide for the enjoyment of wilderness itself. Thus, the installation of bolts can provide for climber safety, limit impacts, and provide access to climbs of exceptional quality that enhance the user's ability to experience a primitive and unconfined type of climbing experience. This language has been added to the discussion of new bolts in wilderness on page 43.

COMMENTS

club to construct a new trail in wilderness. The NPS could authorize such a request under the only exception available in the Wilderness Act.

Under the Wilderness Act, the administering agency may waive the proscription on the installation of fixed anchors in wilderness if necessary for the administration of the area as wilderness. It is under this exception that the NPS allows the construction of trails and the installation of signs in wilderness. By building trails, for example, the NPS encourages travel in safe locations and confines impacts to wilderness associated with the passage of hikers or horses.

Similarly, by treating climbing routes as the NPS would treat a trail, the NPS could authorize a climber to install a new rote in wilderness. The NPS could do so as a means of providing access to climbs of outstanding quality and limiting the proliferation of bolted routes in the same vicinity that would impact wilderness more pervasively.

I have just suggested one possible avenue. I am certain that there are others. However, Alternative E, as written, lays out no standard by which the NPS will decide whether to issue a permit for a new bolted route in wilderness. Alternative E needs to lay out those standards and those standards must recognize that the Wilderness Act has at least some relevance, if not the final word. Alternative E does not acknowledge that the Wilderness Act is either dispositive or even relevant. And that is a mistake.

Public Involvement

There is reason to suspect that the NPS did not compose the climbing language of Alternative E. The language was composed, at the informal invitation of the NPS, by a group of special interests, primarily climbers who would be subject to the regulations. The presence of an "environmentalist" endorsement in that process hardly constitutes complete public involvement.

25-F

Allowing the regulated community to compose the plans or rules that will govern them is not "public involvement" but rather a betrayal of the public trust. It is even more deceptive to put forward those rules as if public servants developed them with an eye on the law and public interest. Imagine if the Bureau of Land Management (BLM) invited and encouraged the American Mining Congress to compose the BLM

REMARKS

25-F – After the lengthy public review and comment process, thorough review of the comments, and consideration of the Joshua Tree National Park Advisory Commission's input, the National Park Service determined that changes to the draft proposed action warranted issuing a supplement to the *Draft General Management Plan Amendment and Environmental Impact Statement*. The *Supplement* presented Alternative E – the new preferred alternative. On November 2, 1998,the National Park Service issued a regional and local press release that announce the public comment period for the *Supplement*. A notice was published in the *Federal Register*. The *Supplement* received wide-spread public review fulfilling the requirements of the National Environmental Policy Act.

rules on mining and then proposed them to the public as BLM's own. That, all of us would agree, would be despicable! Certainly the environmental community would find it so.

If the NPS adopts Alternative E, I request that the Plan explain the following about the "climbing committee":

- the name of the appointing official;
- the process by which persons may apply for membership, if any;
- the number of persons to be appointed as members of the committee;
- the specific criteria used to select the committee members;
- the procedural rules that will govern how the climbing committee arrives at recommendations;
- the official position of the person to whom the committee will give its advice and recommendations on bolted routes;
- measures to be taken to ensure that members represent a broad spectrum of the public interest;
- whether the climbing committee meetings will be open to the public, and
- measures to be taken by the NPS to ensure that the climbing committee conforms to the Federal Advisory Committee Act.

25-G

I shall make this request again, more formally and in a very different venue, when and if the NPS adopts an Alternative E that does not explain the above listed factors.

Thank you for considering my comments

Sincerely,

Frank Burns

25-G –The Climbing Committee section of the plan has been modified to ensure compliance with the Federal Advisory Commissions Act (FACA). The Charter of the Joshua Tree National Park Advisory Commission provides for the creation of subcommittees from among its membership and supplemented, when appropriate, by members of the public. The Chairman, subject to the concurrence of the Designated Federal Officer (the park Superintendent) will determine membership of the subcommittee.

A sitting member of the Advisory Commission will chair the committee. The Commission would select committee members from applicants from the climbing community, conservation organizations, and other interested individuals. All meetings of the committee will be announced through the *Federal Register* notice and will be open to the public. The Climbing Committee will gather information and conduct research for the Commission and make recommendations to the Advisory Commission, which will, in turn, provide a recommendation to the Superintendent. Again, all meetings will be announced and open to the public according to policy. The Superintendent remains the ultimate decision-making authority. See page 41.

COMMENTS

28 1998

3750 El Canto Drive
Spring Valley, CA 91
December 23, 1998

COMMENTS ON JOSHUA TREE NATIONAL PARK SUPPLEMENTAL DGMP AMENDMENT

Any Amendment to the Joshua Tree National Park Management Plan must meet all of the criteria of its designations as
- a national park
- a National Natural Land Mark
- a designated International Biosphere Reserve
among other official designations.

Furthermore, the Joshua Tree National Park is not empowered to exempt itself from the federal laws and mandates such as NEPA, Wilderness, Endangered Species, Antiquities, Migratory Bird, Air and Water Acts, et al.

The NPS is to be commended for considering the comments of the public and responding to them. However, I cannot find in the Supplemental document the data that indicates an over-riding need to accomodate specific equipment-oriented recreational industries such as equestrian and climbing. Nor does there appear justification, percentage-wise, relative to the numbers of other park visitors to compromise standards and guidelines, such as camouflaging new or replacement fixed anchors.

The term "social conflicts" should be deleted from the text. These are user conflicts and cannot be disposed of cosmetically. The same with "social trails" which raises secondary issues of audiences, support groups and the infra-structure of certain receational activities. 26-A

The Supplement addresses Other Climbing Management Guidelines (pg 32) without mention of search/rescue procedures. The NPS, especially Joshua Tree whih has made, or been forced to make, allowances for climbing, should have a set schedule of fines, etc. such as the FAA (Federal Aviation Adminstration) has for non-compliances with regs. This is a Department of Interior Issue but we should start thinking about it. Our wonderful Park Rangers should not be required to provide services, such as on Mt. McKinley, without penalty.

As to the "Fixed Anchor Free Zone:" What other NPS units use it? What is its track record? That information should be in the FEIS, including the identity of the determining officer. 26-B

As to the Climbing Committee, let's have the identify of the appointing officer, specific slots to be filled, term of service, alternates, identity of accountable NPS official, etc. 26-C

And if there is to be a Climbing Committee appointed, why not a Wilderness Designation Committe, a task that needs immediate attention? A committee with comparable powers as the Climbing Committee seems essential to proect the Park's resources for future generations. 26-D

REMARKS

26-A – Comments noted.

26-B – A cursory survey of other climbing areas in the National Park System has not revealed any other parks that are attempting to provide for fixed-anchor free zones. A review of figure 8 on page 47 reveals that the vast majority of the park falls within the fixed-anchor free zone.

26-C – The Climbing Committee section of the plan has been modified to ensure compliance with the Federal Advisory Commissions Act (FACA). The Charter of the Joshua Tree National Park Advisory Commission provides for the creation of subcommittees from among its membership and supplemented, when appropriate, by members of the public. The Chairman, subject to the concurrence of the Designated Federal Officer (the park Superintendent) will determine membership of the subcommittee.

A sitting member of the Advisory Commission will chair the committee. The Commission would select committee members from applicants from the climbing community, conservation organizations, and other interested individuals. All meetings of the committee will be announced through the Federal Register notice and will be open to the public. The Climbing Committee will gather information and conduct research for the Commission and make recommendations to the Advisory Commission, which will, in turn, provide a recommendation to the Superintendent. Again, all meetings will be announced and open to the public according to policy. The Superintendent remains the ultimate decision-making authority.

26-D – If the National Park Service determined that such a need existed, consideration would be given to forming a Wilderness Committee.

COMMENTS

-2- HA

I can live with the section on Artificial Water Sources, but only for a short time. The necessity for them must be supported by in-depth analysis. I respectfully suggest that the California University Land and Water Reserve System be contacted about setting up a desert-wide program with periodic reviews. The political pressures and financial motives are great.

26-E

The Desert Tortoise Recovery Program may or may not work. I refer to the rather "fragile" agreement worked out for the El Centro Field Office of the Bureau of Land Managment in connection with the FlatTailed Horned Lizard program. The Desert Tortoise Recovery Program will demand a good deal of public attention. The FEIS might indicate spcific periods of public review

26-F

As to Parking, Camping and Roads: There should be none in designated Wilderness Areas, nor in those areas added to Joshua Tree National Park in 1994 by the California Desert Protection Act. PERIOD! The Congress designated acceptable activities in the Wilderness Act and reaffirmed them in the Desert Act.

26-G

In spite of undue pressure by various and assorted special-interest groups, there is support for over-all, protective and long-term decisions by NPS administrators, decisions that will fulfill the mandates of the various Acts which will enable our progeny to enjoy our great Parks, not only in California but nation-wide.

I appreciate the professional integrity of the Superintendent and Staff of Joshua Tree National Park and will support their efforts to abide by the laws, guidelines and precendents of their actions.

Harriet Allen

Harriet Allen

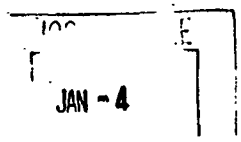
REMARKS

26-E – The language in the artificial water section of the new proposed action (alternative E) has been modified. Please refer to pages 49 and 50.

26-F – Comment noted.

26-G – Comment noted.

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134

Erine Quintana
Superintendent, Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Dear Superintendent Quintana,

Re: Supplement to the Draft General Management Plan Amendment Supplemental Environmental Impact Statement.

I would like to thank you and your staff for all the hard work and many hours spent on the Backcountry and Wilderness Management Plan for Joshua Tree National Park.

I would like to submit the following comments regarding the Alternative E, the New Proposed Action;

Page 13- Wilderness Subzone- "This subzone is governed by the strictest preservation standards and includes designated wilderness, potential wilderness, and recommended/study wilderness. The land in this zone is managed for the preservation of wilderness and its undeveloped and primeval character and influence regardless of category."

"Wilderness is an area "where the earth and its community are untrammeled by man, where man himself is a visitor who does not remain." It retains its primeval character without permanent improvements or human habitation. Wilderness provides outstanding opportunities for solitude or a primitive and unconfined type of reaction. Man's imprint remains substantially unnoticeable."

Is the placement of climbing bolts (fixed anchors) in the Wilderness areas not considered a "permanent improvement"?

27-A

Page 27- Climbing Management- "In permitting recreational activities, including rock climbing, the NPS must ensure that no damage to cultural resources occurs and that every effort is made to protect the parks's natural resources and wilderness values."

Please explain how driving a bolt into a rock does not damage (deface) the rock? Are the rocks at Joshua Tree not considered part of the park's natural resources? If "every effort is made to protect the park's natural resources" and bolts are placed in wilderness, is this not a conflict?

27-B

27-A – A more thorough discussion of wilderness, prohibitions in wilderness, and the exceptions to those prohibitions for the administration for the purpose of the Wilderness Act has been added to the wilderness subzone section on page 22. The permanent installation of bolts in wilderness may be considered an exception to the prohibition of permanent installations in wilderness if the bolts contribute to the administration of the area for the purpose of wilderness. Trails through wilderness can provide for user safety and confine impacts to defined areas as they provide access through wilderness and provide for the enjoyment of wilderness itself. Thus, the installation of bolts can provide for climber safety, limit impacts, and provide access to climbs of exceptional quality that enhance the user's ability to experience a primitive and unconfined type of climbing experience. This language has been added to the discussion of new bolts in wilderness on page 45.

27-B – The National Park Service acknowledges that an improvement to provide for visitor use, whether it is a trail, sign, or fixed anchor, usually impacts natural resources. The primary issue is the determination of if the impact raises to the level of significance. Fixed anchors provide for climber safety, limit impacts, and provide access to climbs of exceptional quality that enhance the user's ability to experience a primitive and unconfined type of climbing experience. They meet the requirements of being the minimum tool for the administration of wilderness for the purpose of the Wilderness Act.

COMMENTS

Page 28- Existing Bolts- Existing bolts could be replaced without a permit in wilderness subzones.
Will all climbing routes in the wilderness subzone be inventoried first to ensure that new routes have not been placed? 27-C

Page 28- Old bolts removed with minimum damage.
What is considered minimum damage? 27-D

Page 28- "Whenever possible, the existing bolt hole would be used for the replacement bolt.
What is meant by Whenever possible? Who will decide whenever possible? If a new hole is needed for a bolt, will a permit be needed for a route change? 27-E

Page 28-The old hole will be filled with a natural colored rock material blended with bonding agents.
Will this filler weather over the years to match the natural rock? Is there any data to show that in twenty years the filler will still match the natural rock? 27-F

Page 28- New Bolts (non-wilderness)
How does the NPS intend to enforce the "monitored process"? Is the NPS hoping that the climbers will report any intent to place new bolts? 27-G

Page 29- Only a limited number of new bolted climbing routes per year shall be allowed.
What is meant by limited number? How many? If a illegal route is found, will it be removed or counted toward the "limited number"? 27-H

Page 29- If potential for resource degradation becomes unacceptable, different management actions would be necessary.
What is meant by "potential"? What is the NPS criterion? What would be the"different management actions would be necessary."? 27-I

Page 30- Levels at or below 1998 conditions.
What are these levels? Are all climbing routes in wilderness inventoried? How many routes exist in wildness areas now? How can the addition of new routes be keep to level below or at 1998 levels? Will old routes be closed before new ones are placed? 27-J

Page 30- suitable distant from existing routes
What is considered a suitable distance? 27-K

Page 30- These and any additional criteria shall be met prior to approving the placement of new fixed anchors.
What are the additional criteria? 27-L

REMARKS

27-C - Some of the specific numbers needed to quantify 1998 conditions were unknown at the time the supplement was prepared. In 1999, however, the National Park Service initiated steps to obtain baseline information to gauge what the 1998 impact levels were. Initial surveys focus on determining the amount of land effected by social trails, identification of flora and fauna that live in the vertical ecosystems, and determining to what extent permanent fixed anchors are used in the developed zone and backcountry transition and wilderness subzones. The National Park Service is currently conducting surveys, based on stratified sampling methodology that will be used to approximate the number of bolted routes that are present within Joshua Tree National Park. Preliminary data indicates that there are approximately 3,475 bolted routes in the park and approximately 7,128 bolts. This approximated number will be used as a target goal and will be used by the National Park Service and the Climbing Committee in evaluating requests for new bolted routes.

27-D – The National Park Service proposes that climbers should use the same hole to replace a bolt. If that is not possible for the safety reasons, then the old hole should be filled with a natural colored rock material blended with bonding agents.

27-E – The language has been edited to read, "Whenever possible for the safe replacement of an existing fixed-anchor, the existing bolt hole would be used for the replacement bolt." The individual replacing the bolt would make the determination. See page 41

27-F - The bonding agent immediately blends in with the existing rock color; it does not require aging. In the National Park Service's opinion, the filler will continue to be unnoticeable.

COMMENTS	REMARKS
Remarks 27-G through 27-J are continued from previous page.	27-G – Under the monitored process, new bolted routes in the developed zone and the backcountry transition subzone would not require a permit, but the climber wishing to place additional bolts must complete a checklist of criteria that would be developed by the Climbing Committee. The checklist would be submitted to the National Park Service and the Climbing Committee. The Climbing Committee would work with the National Park Service to monitor the rate and locations of new fixed anchor placements to ensure that impacts do not reach unacceptable levels. 27-H – The number of new bolted routes would be monitored by the National Park Service to ensure that resource degradation does not occur. If an unreported route were found, it would be evaluated against the criteria on the checklist to determine if it should remain or be removed. 27-I – The criterion would focus upon the cumulative impacts of climbing and not focus solely on the number of fixed anchors. For example, the access trails and base of climbs would be monitored for soil compaction and degradation of the vegetation. Different management actions may include relocation of specific bolts, relocation of approach and descent routes, permanent or temporary closures, etc. 27-J – There are many climbing routes already established in the park's wilderness. The number of bolted routes in wilderness is less important than the cumulative levels of resource impacts associated with climbing those routes. Wilderness is a finite resource, however, and continued unregulated placement of bolts in Joshua Tree National Park's wilderness is unsustainable. Existing bolted routes would not necessarily have to be removed before additional bolted routes can be established in wilderness. No new bolted routes would be permitted if they would increase the cumulative levels of impacts to the wilderness resource beyond those estimated for 1998. Also see 25-B.

COMMENTS

Page 31- Fixed Anchor Free Zone
How many other National Parks have a Fixed Anchor Free Zone?

I would like to make a few general comments at this point.

1) The Climbing Committee is a good idea but what about the other special interest groups that also use the park? Will other committees be formed? 27-M

2) The use of horses, mules and llamas in the park. Will the animals be allowed to graze in the park or will they pack their own food? Will the owners/users be required to pick up the "droppings" as not to introduce exotic plants species into backcountry/wilderness areas? 27-N

Thank you for allowing the general public to comment of the Backcounty and Wilderness Management Plan. I would also like to inform you that I am a climber and have spent many winters at Joshua Tree.

Sincerely,
Douglas Allen

Douglas W. Allen
1742 Meade Ave
Sa CA
95

REMARKS

27-K – Such specifics would be determined on a case-by-case basis.

27-L – All of the criterion will be developed with input from the Climbing Committee. Because the National Park Service was interested in receiving the recommendations and advice of the Climbing Committee, some aspects of the new proposed action were intentionally left vague.

27-M – If the National Park Service determined that such a need existed, consideration would be given to forming a other committees.

27-N – Stock is not currently allowed to graze in the park; they are required to pack food. At this time, users are not required to pick up droppings.

COMMENTS

12/26/98

18

Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

0 1998

Dear Sir:

Although I agree with most of the Draft Backcountry and Wilderness Management Plan, I have made a few comments below.

First, I am in favor of the additions to Wilderness recommended in the Plan starting on p. 16

Second, I am opposed to the designation of equestrian corridors mentioned on p. 16 and 22. I do not believe that horses should be allowed on any trails that are not regularly maintained, and should never be allowed in "corridors" or cross country, which is about the same thing. Cross country, horses do so much damage to the land that they make new de facto trails which would under natural conditions take hundreds of years to recover, since once the cryptogramic crust is broken and compacted, it is very slow to recover. Horses also damage trails sufficiently that regular maintenance should be performed. Allowing "corridors" of an undefined width is equilivant to allowing cross country travel. The width of these "corridors" is unspecified, and there is also apparently no provision for maintaining these de facto trails. Horses must be confined to regularly maintained trails in a narrow trail tread to avoid undue damage to Wilderness and Park resources. 28-A

Third, I support the proposal on p. 25 to not allow OHV or Green Stikie vehicles in the Park, and on p. 27 to close and reclaim unneeded roads. I especially support the statement that these road closures will be accomplished consistent with the memo "Defining Minimum Requirements for Administering Wilderness Areas Within the California Desert."

Fourth, I do not believe that permanent climbing bolts should be permitted in Wilderness, as proposed on p. 29. In fact, I believe that permanent climbing bolts are prohibited in Wilderness because they are an "installation" within the meaning of the Wilderness Act. They only way they could be permitted in Wilderness is though the administrative exception, and in that case a full Minimum Requirement Analysis and Minimum Tool Analysis must be performed and documented as per "Defining Minimum Requirements for Administering Wilderness Areas Within the California Desert" subscribed to by the various administrative managers of Wilderness in the California Desert. 28-B

Fifth, I support the proposed group size restrictions on p. 32 (25 in wilderness subzone, 12 in Wilderness) and the area closures on p. 33. Both of these proposals are well supported by the need to protect Park and Wilderness resources.

Sixth, I support the plan for dealing with artificial water sources (guzzlers) starting on p. 36. However, any activities in Wilderness must have a Minimum Requirement for Administration analysis if it would otherwise not be consistent with the Wilderness Act, and also would require a Minimum Tool Analysis. Also, there should be an analysis documenting how these guzzlers affect *all* species, not just bighorn or endangered species. 28-C

Seventh, I am confused by the trails shown on Figure 5 and in Appendix D. Figure 5 seems to show most trails in black, which indicate they are foot trails, and none that I can see in purple, indicating horse trails. However, Appendix D indicates that most trails are hiking and equestrian trails. This apparent discrepancy should be clarified. There should be a clear plan for designating stock free trails, in a ratio approximating the number of users of horse trails vs the number of hikers. 28-D

Lastly, I believe that there should be proposals to close the Granite Mountain And Zyzzx research areas to public use, although this may be included in the origional plan.

Thank you for your attention to these matters.

Sincerely,

Stan Hayo

Stan Hayo
230 Larkspur
Ridgecrest, CA 93555

REMARKS

28-A – Comments noted.

28-B – The National Park Service believes that this *General Management Plan Amendment and Environmental Impact Statement* fulfill the requirements of the Minimum Requirement Analysis and Minimum Tool Analysis.

28-C – Comment noted.

28-D – We have changed the colors on figure 6 – Joshua Tree National Park Trails and Corridors. See page 34.

COMMENTS

REMARKS

84

JOSHUA TREE
28 1998

December 19, 1998

John Hurthere
PO Box 84837
San Diego, CA 92138-4837

Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Superintendent,

I am writing to address the Supplement to the draft General Management Plan for Joshua Tree National Park, specifically Amendment E. I agree with the Access Fund's general interpretation that, "the present alternative for climbing management represents a good-faith effort of the Park Service, climbers, and the environmental community to protect Joshua Tree from over-use while still providing a varied and quality climbing experience... we will encourage the Park Service to **clarify or change elements of the plan which remain problematic.**"

As a climber and frequent visitor to Joshua Tree, I would like to address my specific concerns and recommendations.

The concept of *visitor experience* as a criteria for managing climbing is worrisome. Which visitors? Joshua Tree National Park (like all America) is a melting pot for dissimilar activities and attitudes. Some visitors will be appalled by all forms of recreational climbing. Some climbers will be appalled by certain contrived routes. How will the proposed Climbing Committee measure the value of "visitor experience?" I fear that this language – empowering only the Climbing Committee - will be unfairly applied against climbers. Shouldn't the Park evaluate equestrian and bicycle traffic against "visitor experience" as well? **I recommend that you define the terms, *visitor experience, social conflict*, and *wilderness experience*, and/or apply these terms equally to all users.**

29-A

"Placement of any new fixed anchor in wilderness shall require prior approval in the form of a permit by the Superintendent, and any climbing impacts shall not exceed 1998 levels. The Supplement would establish fixed anchor free zones in the park." What will the criteria and timeline be for approving or denying a permit? What about anchors placed in emergency situations? Will the Climbing Committee govern this process as well? Roughly 85% of the Park and most of the quality recreational climbing is in wilderness. This plan proposes to halt climbing development at 1998 levels and establish climbing free zones. The concept of halting climbing at 1998 levels is askew. The Park should endeavor to halt **environmental impact** at 1998 levels (or at some other conservative

29-B

29-A – Comments noted.

29-B - There are many climbing routes already established in the Park's wilderness. The number of bolted routes in wilderness alone is less important that the cumulative levels of resource impact associated with climbing those routes. Wilderness, however, is a finite resource, and continued unregulated placement of bolts in Joshua Tree National Park's wilderness is unsustainable. With the assistance of the climbing committee the park will establish the criteria for placing of bolts.

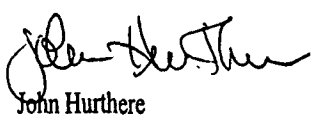
The objectives of the plan are to keep the cumulative impacts of climbing in the non-wilderness areas of the park to acceptable levels and to keep the cumulative impacts of climbing in wilderness to levels at or below 1998 conditions. Some of the specific numbers needed to quantify 1998 conditions were unknown at the time the supplement was prepared. In 1999, however, the National Park Service initiated steps to obtain baseline information to gauge what the 1998 impact levels were. Initial surveys focus on determining the amount of land effected by social trails, identification of flora and fauna that live in the vertical ecosystems, and determining to what extent permanent fixed anchors are used in the developed zone and backcountry transition and wilderness subzones. The National Park Service is currently conducting surveys, based on stratified sampling methodology that will be used to approximate the number of bolted routes that are present within Joshua Tree National Park.

level). I urge you to determine recreational climbing's contribution to environmental impact, and then to **manage climbing resources proportionally**. Meanwhile, I recommend that no new routes be allowed or old routes removed in wilderness without a review by your (hopefully unbiased) Climbing Committee. Old unpopular routes will be removed, and perhaps new classics will be created. **I cannot endorse "anchor free zones."** 29-C

29-C – Comments noted.

I appreciate the delicate balance you must maintain to manage the Park for the benefit of the environment and all users. I further appreciate the opportunity to comment on this plan. If you have the time to address my concerns or would like further information please contact me.

Regards,



John Hurthere
619.524.7946
hurthere@home.com

COMMENTS

REMARKS

JAN - 7 9

171

Dec 30, 1998

Superintendent
Joshua Tree Nat'l Park
74485 National Part Dr.
Twenty Nine Palms CA 92277

To whom it may concern:

I would like to comment on *New Proposed Action* for the Joshua Tree Backcountry and Wilderness Management Plan. I received a copy recently (thank you for sending it) and have these comments:

) Re. Climbing – As a climber who has used many fixed anchors I both appreciate their usefulness in keeping me safe yet recognize that they have the potential to detract from the natural beauty that Joshua Tree offers. I feel that the policies you have introduced effectively match the need for safety and diversity that climbers have with the preservation of the aesthetics that Joshua Tree is famous for. Though some climbers will complain that the restrictions you have in place are too much, I appreciate the conflicting demands that you face and feel that the compromises that we climbers are making are in the long term best interests of the park and thus our enjoyment of the park.

2) Re. Bicycling – on my climbing excursions to JT I have always brought my bike and done some nice riding on the roads that exist in the park, but have also felt that if properly managed more trails could be accessible to bikes. I have been able to ride in many different climates and on many different types of trails and know well the potential damage that bikes can do, but I think that the conditions that JT offers is conducive to responsible riding. I'm pleased that park management recognizes this new, low-impact way to appreciate the park's beauty.

3) Overall - I feel that for one of the first times that I can remember, a government agency has listened carefully to its constituents in the evolution of this action. I was incensed at the details of the original plan, but the new plan is an excellent reflection of the NPS's willingness to listen and negotiate for a thoughtful plan that balances the sometimes-paradoxical demands of the different users. In an era of great turbulence surrounding public lands, I hope that the rest of the NPS, FS, and BLM folks recognize your progressive ability to listen and plan effectively.

Sincerely,

Tom Diegel
1123 Peninsula St.
Ventura CA 93001

30-A – Thank you for your support.

COMMENTS

29

Date: 13 December, 1998

From Jim Roache
2942 Mary St.
La Crescenta, CA 91214

1 0 1998

To: Superintendent,
Joshua Tree Park,
74485 National Park Dr.
Twentynine Palms, CA 92277

Subj Comments on Supplement to Backcountry and Wilderness Management Plan

Dear Sir or Madam,

Thank you for forwarding a copy of the new Supplement to me. It is encouraging to see the various user groups that enjoy and frequent Joshua Tree have come together to form a consensus that may not be ideal for any group, but as a whole it can be complied with without significant impacts to their enjoyment. I have only one comment on the plan, and that is in the ambiguous wording of the "Fixed Anchor Free Zone" on page 31.

While I do not agree with the idea of a zone where fixed anchors would be removed, I am willing to accept that compromise for the sake of appeasing other users. The wording identifies "rock formations which form corridors along washes providing access to the Wonderland of Rocks from Barker Dam (not including major formations which are merely visible from Barker Dam and the Wonderland Valley)." This leaves a lot open to the interpretation of those enforcing the policy, a potentially dangerous thing. Some of the best climbing routes in Joshua Tree are in this area, and the wording should be clarified to make sure that the routes on the Lenticular dome, Astro domes and Fabulous Furry Freak Brothers dome (among others) will not be affected. 31-A

I thank you for your time, and I hope these words can help your forthcoming difficult job of reviewing the public comments to the plan. If you have any questions, please feel free to call me at the following numbers

Respectfully,

J Roache

Jim Roache,
Home (818) 249-1349
Lockheed-Martin Fluid Dynamics Lab (805) 572-4777

REMARKS

31-A – The text of the proposed action (alternative E) has been modified to read "...rock formations which form the corridor along the Nature Trail providing access from the parking lot to Barker Dam (not including major formation that are merely visible from Barker Dam Nature Trail)." We believe this will clarify the proposed action. See page 45 and figure 8 on page 47.

COMMENTS

REMARKS

167

Mrs. Susan Luckie Reilly
P. O. Box 262
Twentynine Palms, CA 92277
Phone: 367-9936
January 1, 1999

Superintendent, Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Dear Superintendent Quintana

I apologize for being a day late with this comment, but hope that it will still count. The business of the holidays shoved this matter out of mind temporarily, until I looked at the reports and suddenly realized that I let the deadline go by.
My comments are not based on your news releases and reports, but are purely my own opinions on the subject. I did not realize the importance of this controversy until now, and am sorry that I did not come and speak up at the meetings. It appears to me that the climbers have ganged up on the Park just as the off-roaders ganged up on the BLM.
However, I feel sure that the climbers are not the majority of people who come to enjoy the Park. It is very important to keep as many of those beautiful rocks pristine as possible for the benefit of all of the Park's visitors. Yes, you can patch up holes made in the rocks; but how long will those patches endure against the erosion by wind and weather to which they are subjected? It would be a sorry sight to see patches falling out of the rocks after a few years, and would impose a burden of maintenance on the Park staff to keep this from happening.
I hope that climbing holes will be limited to certain places only, either where they already exist, or out in a special place in the back country where most people do not go. Have you considered sending rock climbers out into BLM country such as Hole in the Wall, instead of defacing the rock piles in the Joshua Tree National Park?

I have known and loved the Park since it was declared a Monument in 1936. I served as a Ranger-Naturalist there for a while and had the prized opportunity to lead walks and give talks to help bring appreciation and enjoyment of it to everybody from Scout Troops to Senior Citizens. I don't think anyone ever fails to appreciate the beauty of the Park, and the rocks are a prime part of that. They should not be defaced for a single-purpose recreation--climbing--by a minority group to the detriment of their aesthetic value to the majority of the visitors.

I fully realize that I am "preaching to the choir," as I know that Park Service people hold dear the natural beauties of this world. I am just saying don't give in too much to strong pressures that are being exerted by organized rock climbers. You hear from them concentratedly because they are pushing strongly for something they want, and are working to get all of their people into the push. How many hundreds of thousands of other visitors may not even know about this, but might see the results in future years?

Sincerely yours, Susan L. Reilly
Susan Luckie Reilly

32-A – Thank you for your support.

COMMENTS

REMARKS

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H M Colbert
16- 64th Place
Long Beach
Calif, 90803
1/6/99

Superintendent
Joshua Tree Park
74485 National Park Drive
Twentynine Palms, California, 92277

Comment on the Supplement to the Draft General Management Plan, with respect to horse riding in the Park.

Under the Monument Rules, which carried over into the Park, it is illegal to ride a horse across the open desert, compact soil, cause erosion, ride into water sources, and it is only legal to ride in sandy washes and on the CRH Trail, and from trail heads within the Park. 33-A

Furthermore under P L 103-433 it is required that the impact of a use on protected resources be assessed and if that impact exceeds the prescribed standards, that the use be constrained. This requires a survey of resources, and a determination of the impact on the resources. To date you have not done this, but others have, and it is found that the proposed horse use violates the prescribed standards with respect to almost every protected resource of the Park. 33-B

Consequently it is not possible to legalize horse riding as it is proposed, but only to condone the illegality. But you cannot enforce 103 against some users and not against others unless you want to stand to a criminal charge for violation of civil rights. For example, horse riders do not want mountain bikers on their trails, so they require you to condone the illegality of their horse riding by not enforcing 103 against them, then turn around and enforce the same law against mountain biking "because it is illegal". Under the same principle, both of these do not want motorcycles on "their trails". The result is the mess you have of trying to please any and all comers by handing them their own piece of the Park.

However these proposed private, commercial, Real estate, city residential development, horse riding, mountain biking, motor vehicle use etc, all require impact standards that illegally exceed the allowed "visitor on foot" impact standard. And those who, out of courtesy to themselves and others, adhere to the "visitor on foot" standard, not only do not want all these destructive uses in their Park but they also have the law on their side. They are beginning to wonder why you are not enforcing those laws, and are becoming increasingly vocal in the public review and comment process, and can raise the issue of not enforcing the law. 33-C

The result is that your policy of satisfying everyone by giving them a piece of the Park is impossible, because you have to pass out more than there is, so the only thing you can do is to keep putting off the decision like you have done, or to change your basis for deciding.

The problem is that you have usurped the legal prerogative of deciding the appropriateness of uses. Your "reasonableness" criterion on use is not a criterion at all since anyone can make their use sound reasonable. The statutory criterion is "compatibility" with preservation of protected resources in perpetuity, and that is a technical decision.

For example, for the impact of horse use determined by the prescribed procedure, the per visit "resident on a horse" impact profile for mechanical damage, is 600 times that of the "visitor on foot" impact profile. If the other horse impact mechanisms are included, the proposed horse use threatens to damage or degrade almost every protected resource, and therefore must be constrained to be legal, and in just about exactly the way that the Monument regulations do. Further if the base impact standard is increased from the "visitor on foot" to the "resident on horse" impact profile, many resources lose their legally protected status, for example all the plants under two feet tall, and that is violation of P L 103. Also if you change the base profile for all visitors it allows for trampling of vegetation equivalent to a strip one mile wide and twenty miles long.

No wonder you keep putting off the decision.

I can personally sympathize with the position you are in because I once tied to settle an estate "amicably" by giving everyone what they wanted. After repeated failed attempts to find a way to distribute

33-A - Currently, equestrians must stay on established trails, such as the California Riding and Hiking Trail and the Boy Scout Trail, or must use active washes. Thus, the plan increases the number of miles of trail but in reality also restricts equestrians to designated trails rather than all trails plus all active washes.

33-B - The National Park Service Organic Act directs the Service to preserve park resources "unimpaired," while providing for the public enjoyment of those resources. Because public enjoyment cannot be sustained if park resources are damaged or compromised, resource protection must necessarily be the Service's paramount responsibility. Within that constraint, the National Park Service must manage recreational activities and settings to protect park resources, provide for public enjoyment, promote public safety, and minimize conflicts with other visitor activities and park uses. The Service is directed to monitor recreational activities and assess their potential impacts on park resources.

Although the new proposed action designates many more mile of trails than were previously official, it restricts equestrians to designated trails rather than trails plus all active washes. Casual or social trails not designated as part of the trail system would be restored to a natural condition. No new trail requests from the public would be considered until the trail network and corridors proposed in this plan are inventoried, developed and monitored for several years. Monitoring the trail network would become an on-going process. If, during the monitoring, it is determined that resource damage is occurring or conflicts between user groups are occurring, the National Park Service has the authority to either close trails or corridors or reroute trails to mitigate the damage and prevent future resource and visitor experience degradation.

33-C – Comments noted.

the assets it dawned on me that people want everything they can get their hands on, which adds up to more than there is to pass out. The problem is that someone is shorted of their legal property which raises the specter of a criminal charge. Taking this clue I looked into the law and found it it was the distillation of centuries of experience in dealing with grabbing, and that it made decisions in such a way that everyone got their legal share. It dawned on me that trying to give everyone what they wanted was a way of avoiding the responsibility for unpopular distribution, and that the law accomplished the same thing, but in a way that no one could come back at me except through anger. Anger I got, but had to admit I had earned it by giving people the idea they were going to get more than their legal share in the first place. I also found that in the end everyone gets their legal share minus what liquidators take (usually attorneys). For example, in your case, real estate agents are selling boundary property at inflated prices on the promise of attaching miles of private trails in undeveloped wilderness. In the end these horse ranchers will face either a chain link fence or motorcycles all over their trails, and lose in either case, and the liquidators will have long since disappeared with their cash.

33-C

You can take the above as a friendly indication of a way to back out of an impossible situation by backing into the law, or as a less friendly intimation that my colleagues and I are well aware of our legal right to have the Park preserved to the "visitor on foot" impact standard.

Finally, BLM land would serve equally well for the proposed uses, with the possible exception of rock climbing, for which the park features are unique.

294

Superintendent of the Joshua Tree National Park 2/17/98
74485 National Park Drive
Twentynine Palms, CA 92277

Dear Sir:

I was very disappointed to find that the North Coxcomb access road to the Aqua Peak Trailhead has been closed. When I was younger I walked most of the backcountry of the Park, but now am 60 years old and partially disabled. The only two places where the elderly and disabled can experience quality wilderness are Upper Covington Flat and the Aqua Peak Trailhead area. With Upper Covington Flat smelling of horse manure, and the Aqua Trailhead closed, quality wilderness experience is closed to the disabled and elderly. Not only is this unconscionable but Federal Law requires you supply such access, and these two places fill that statutory obligation admirably.

34-A

There is another compelling reason for keeping the trailhead access road open: access via the road minimizes hiker impact on the wilderness in the area, whereas closing the road maximizes hiker damage.

The reasoning goes like this.

First, there are a number of features concentrated in the Aqua Peak area that attract hikers: the Aqua Peak Trail, Stormy Sea, Pinnacles, Diadic Crest, Deep Cut, Central Flat, west crest to Holey Pass, the Coxcrest Hiking Route, and generally, the world class combination of rugged grandeur and lofty aeriness.

Second, access to these features from the centrally located Aqua Trailhead causes no damage to the natural state of the wilderness, because it is by sandy, stony wash, or across plutonic boulders and bedrock.

Third, surrounding these features of the Aqua Massif is fragile bahada of soft sand and soil, heavily foliaged with bushes, annuals and perennial plants. Access to the Trailhead confined to the road causes no damage to this.

But look what happens if the road is closed.

Hikers have no interest in the fragile bahada. They just want to get across several miles of it to the Aqua Massif, so they park at any convenient spot along the aqueduct or highway and take a straight shot across the fragile bahada to the feature of interest. The result is the maximum spreading of the compaction and proliferation of trails, and therefore maximum impact on the bahada, rather than no impact via the road.

If you had deliberately set out to cause the maximum damage to the natural state of this area you couldn't have thought of a better way than using hiker access, by closing the established access route across a fragile part of it, to an area of great interest.

A little thought shows that this is what is causing most of the damage in the Park: severe by horses and rock climbers, and less so by urbanites, campers, casual visitors, hikers and others.

34-A – The access road into the north Coxcomb Mountains that leads to the Coxcomb Mountains (Aqua Peak) trail was closed because the area was congressionally designated as wilderness in 1994. This road was automatically closed by law and was not subject to the decision-making processes of this plan. The National Park Service would encourage visitors to access the Coxcombs on foot using the old roadbed to minimize impacts on the area.

COMMENTS

REMARKS

My understanding is that the Draft General Management Plan Amendment is to be driven by Management Goals, which leaves me completely baffled as how this plan is to be implemented. One of these goals is to: "manage visitation more effectively and reduce impacts associated with dispersed and poorly defined visitor use facilities".

What you did was take the major visitor use facility of the North Coxcomb's, which was extremely well defined, had no dispersal, and negligible impact, and was in fact the very model of this Management Goal, and turned it into a poorly defined, highly dispersed, heavy impact facility which is now the very example of what the goal purports to remedy.

Sincerely,
Harry M Colbert
16-64th Place
Long Beach CA, 90803

#1 2.6

7 1998

December 12, 1998

Superintendent
Joshua Tree National Park
74485 national Park Ave.
Twentynine Palms, CA 92277

Re: Proposed Joshua Tree Management Plan

Dear Superintendent,

Please accept the following comments and suggestions concerning the Proposed Joshua Tree Management Plan for your review as solicited by the recently released SUPPLEMENT to the DRAFT GENERAL MANAGEMENT PLAN AMENDMENT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT for a comment period from November 1 to December 31, 1998.

Of particular interest to me is "Alternate E", and specifically the part that addresses climbing within Joshua Tree. As a climber, I can not speak for every single climber that may wish to experience Joshua Tree, but I believe that my comments would mirror that of many climbers within the climbing community. I would appreciate your direct feedback to my comments at your earliest convenience.

While the overall plan itself has many positive aspects such as the formation of a Climbing Committee to help review and advise the National Park Service (NPS) on a reasonable approach to ensure that climbing continues at Joshua Tree, there are areas within the document that I have reviewed which are either vague, or are open to subjective interpretation.

There is a general theme throughout the Plan that many of the final decisions are to be made by the Park Service itself. I would respectfully request that any decisions affecting climbing within Joshua Tree would be made after careful consideration of input from both the Climbing Committee, and the climbing community at large. 35-A

The subject of new climbing routes being added to the park is also vague by the statement of "New routes shall always reflect the commitment to keep the cumulative impacts of climbing in wilderness to levels at or below 1998 conditions", and "the NPS shall ensure that future levels of climbing-related impacts in wilderness do not exceed 1998 levels." I hope that I am interpreting the presiding statement incorrectly, but I get the feeling that this could leave open a "quota system" on the number of climbers allowed to experience Joshua Tree. The idea of limiting the amount of climbers (without limiting all user groups) is appalling to me. As there is currently an overall growth in climbing as a recreational activity throughout the country (along with other recreational users), I would urge that NPS should be prepared to anticipate an overall increase in use of the park for both climbing and other recreational uses in the future. 35-B

35-A – Because the National Park Service is interested in receiving recommendations and advice from the Climbing Committee on some of these issues, portions of the plan were intentionally left unspecific. The Climbing Committee cannot be established until a record of decision is signed, and so some of these decisions will not be made until the National Park Service receives the input of the Climbing Committee. The Climbing Committee will assist and provide input on climbing management actions. The Superintendent, however, remains the ultimate decision-making authority on climbing management.

35-B – The objectives of the plan are to keep the cumulative impacts of climbing in the non-wilderness areas of the park to acceptable levels and to keep the cumulative impacts of climbing in wilderness to levels at or below 1998 conditions. There are many climbing routes already established in the park's wilderness. The number of bolted routes in wilderness alone is less important that the cumulative levels of resource impacts associated with climbing those routes.

35-C – Placement of new fixed anchors in the developed zone and backcountry transition subzone would be allowed, except where explicitly prohibited, under an established monitored process that requires climbers to report their intent to place new bolts to the National Park Service. The Climbing Committee, working within National Park Service parameters, would establish a process for monitoring the placement of new bolts. This process would promote climber education and self-regulation. The National Park Service would complete the inventory of climbing impacts within one year of the adoption of this plan and would identify areas where additional bolts would conflict with other park values or management objectives.

Under the monitored process, new bolted routes in the developed zone and the backcountry transition subzone would not require a permit, but the climber wishing to place additional bolts must complete a checklist of criteria that would be developed by the Climbing Committee. The checklist would require the climber to consider the potential impacts of new bolts on park resources and the experience of other visitors. A positive response to each of the criteria to be evaluated in the checklist would be considered implied approval for placing new fixed anchors. In essence, this is an honor system and would encourage climber investment in park management objectives and priorities.

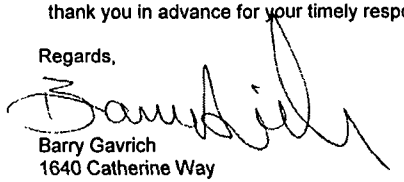
COMMENTS

- *The "interim permit" requirement for new bolted climbing routes in non-wilderness, and the yet-to-be-determined process for monitoring new route activity are inadequate.* Both of these areas require a much more detailed definition of how they are to be implemented, and what guidelines will be used for the evaluation of adding additional routes. 35-C
- *The establishment of a "cap" on new bolted routes is not needed.* A properly implemented process for the review and determination of adding new routes would be self-policing, and does not require any "cap" since the review process itself performs that function. 35-D
- *Regarding the language concerning "social trails." I feel that the language of the following is a bit harsh – "The NPS would formalize a process to inventory social trails, designate the minimum number of trails needed to access climbing areas, place physical barriers and signs to protect sensitive resources, etc."* A more neutral approach would be to use the previous language of "Development of the trail system would provide for better resource protection. Designated trails would be specifically defined, identified by a defined tread, and maintained to varying degrees. Existing trails would be rehabilitated." 35-E

As mentioned previously, I support the overall intent of the new revision(s) to provide a responsible plan for the management of Joshua Tree so that all use groups may enjoy what is truly a national heritage. However that does not mean that a single use group (climbers) should be singled out for such restrictive measures without providing much greater detail in the working language of the plan, and also providing a means for input from the use group in question.

thank you in advance for your timely response.

Regards,



Barry Gavrich
1640 Catherine Way
Reno, NV 89523

REMARKS

35-C (cont.) - While the National Park Service completes the inventory of climbing impacts, there would be a 1-year period during which a permit would be required before new bolts could be placed in the developed zone and the backcountry transition subzone. During this interim period, proposals for new bolted routes must be submitted to the park superintendent, who would work with the Climbing Committee to evaluate them based on the criteria developed for the checklist. As part of a proposal to place new bolts during this interim period, the climber must also complete and submit the checklist, which would verify that all criteria for new bolt placements are adhered to.

35-D – The National Park Service Organic Act directs the Service to preserve park resources "unimpaired," while providing for the public enjoyment of those resources. Because public enjoyment cannot be sustained if park resources are damaged or compromised, resource protection must necessarily be the Service's paramount responsibility. Within that constraint, the National Park Service must manage recreational activities and settings to protect park resources, provide for public enjoyment, promote public safety, and minimize conflicts with other visitor activities and park uses. The Service is directed to monitor recreational activities and assess their potential impacts on park resources. When there is potential for adverse impacts, the service will initiate an appropriate policy or regulations response to prohibit or control the activity and avoid the adverse impacts. Therefore, the Service should not wait until a use becomes a significant impact, but should take a proactive stance to prevent degradation to resources, an adverse impact on wildlife, or diminishment of other visitors' enjoyment from occurring.

35-E – Comments noted.

COMMENTS

REMARKS

362

n 1998

19

December 26, 1998

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

RE: Back country management plan.

Dear sir:

Thank you for providing me with the management plan proposals under consideration.

I wish to express my support for **Alternative E.**

As a backpacker, hiker, rockclimber, and supporter of wilderness preservation, this alternative appears to provide the best balancing of the inevitably conflicting objectives. I knew little of Joshua Tree until I went there on a climbing trip. It is a premier destination for climbing, but not to the exclusion of other values.

I applaud your efforts to work with all the interested groups of non-motorized recreational users and preservationists. I hope that you will keep on-going efforts such as the climbing committee alive so that issues and potential conflicts will have forums where they can be addressed early and rationally. No one will realize their ideal, but that is the reality we must all face.

Sincerely

Michael Baker
8150 E. Via de la Escuela
Scottsdale, Arizona 85258

36-A – Thank you for your support.

COMMENTS

REMARKS

115

uthor: Ernie Quintana at NP-JOTR
te: 12/28/98 1:09 PM
ormal

TO: Mary RisserTO: Judy BartzattSubject: Supplemental Draft-Backcountry & Wilderness Mgmt Plan---------- Message Contents

---------- Forward Header ----------
Subject: Supplemental Draft-Backcountry & Wilderness Mgmt Plan
Author: Roberta Frederick <endofroadranch@eee.org> at NP--INTERNET
Date: 12/28/98 9:49 PM

ATTN: Superintendent, Joshua Tree National Park

As equestrians and residents of the Monument Manor area of Joshua Tree, bordering JTNP, we would like to respond to the Supplement recently released. We believe that the greatest possible consideration has been given to both the equestrians and the neighborhood bordering JTNP at the West Entrance. Great fairness has been shown to all parties in this Supplement. We would like you to know that we genuinely appreciate the efforts that were made to help reach an equitable solution to conflicts between the neighborhood and equestrians entering the Park at the West Entrance.
We also appreciate the variety and length of the trail system as well as e consideration given to users of the trails in JTNP. The Borrow Pit aging Area is a terrific idea as it will give equestrian trail users, other than residents of the West Entrance area and their friends, access to some of the best riding in the Park.

Sincerely,
Terry and Roberta Frederick

37-A – Thank you for your support.

COMMENTS

28 1998

2818 Truman Ave
Oakland, Ca 94605
Dec 16, 1998

Superintendent
Joshua Tree Nat Park
74485 Nat. Park Drive
Twentynine Palms, Ca 92277

Dear Park Superintendent:

Please, no bolting of the rocks in this wilderness area. Wilderness means that human impact must be kept to the bare minimum. These lands were added to the park as "wilderness" hence, no roads, no parking lots, no bolting of the rocks, no parking lots — Nothing

Sincerely
Millie Buckner

REMARKS

38-A – Comments noted.

Alan Levin
92 Miramonte Drive
Moraga, CA 94556
510-377-6519

12/20/98

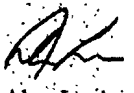
Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Dear Sir:

I am writing in regards to the draft Backcountry and Wilderness Management Plan for Joshua Tree National Park. I have had the privilege of visiting this beautiful Park once or twice a year for several years and plan to continue this.

I want to voice my concern that when lands were added to Joshua Tree by the Desert Protection Act, they were to be wilderness areas. I would urge you to oppose any efforts to build new roads, parking lots, camp grounds. Also, please do not permit rock climbing practices that damage or deface rocks in these areas. People using these lands should be permitted to hike and camp in wilderness fashion, enjoying the beauty of nature, and doing no harm to it.

Yours truly,



Alan Levin

39-A – Comments noted.

COMMENTS

REMARKS

Ernest Quintana
Superintendent, Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Dear Sir,

I have read the "Supplement to the Draft Backcountry and Wilderness Management Plan for Joshua Tree National Park". As a very active climber in the park, and one who wrote concerning the original plan, I would like to take this opportunity to comment on the Supplement.

First and foremost, I would like to complement everyone who worked on the Supplement. It is obvious that many hours went into the compromises detailed in this document. In many ways, the plan has progressed in it's views on climbing within the Park. However, the lack of detail on some of the very important issues concern me.

I am heartened to see that at the core of the climbing plan is a Climbing Committee. It is my understanding that this sort of advisory body has been productive in other climbing areas. It is my hope that this committee will allow for a objective view of climbing in Josh.

Also, it is encouraging to see that the complete ban on bolting in the park's wilderness has been lifted, and that the proposal for removing existing bolts deleted. I could not imagine the danger faced by climbers who depend on these fixed anchors to get them safely to the ground. I for one, am not for wholesale bolting within the park, wilderness area or no. Indiscriminate bolting serves no-one, especially not the climbing community. However, amazing experiences exist for today's and tommorow's climbers in both the existing bolted and partially bolted routes, as well as new routes that have not yet been realized.

Above all, the fact that the Park Service has embraced most of the comprise developed by the Access Fund, Friends of Joshua Tree, The Wilderness Society, and the National Parks & Conservation Association, has given me the hope that it will be possible to preserve Joshua Tree's unique experience for all users of the park, with climbers and the park service as partner's in this enterprise.

I do have to mention that certain lack of detail in the plan alarms me. Specifically, the vagueness surrounding the interim permit process for new bolted routes, the process for monitoring new route activity, and the criteria for a new route permit in the wilderness. Also, there is mention of environmental damage from climbing that seems unsubstantiated to me. Concerning damage to wildlife in the park, I have never seen a climber do anything to endanger a single animal. I cannot say the same for the obvious non-climbers who I have seen giving snacks to begging coyotes, and the children throwing rocks a tarantulas. Restricting climbing due to these claims seems unfair without concrete data.

The wording concerning removal of routes in the wilderness that may impinge on the wilderness experience also concerns me. Quite frankly, it is much harder to find routes in the wilderness than anywhere else. I can certainly agree that a bright orange sling hanging from a rock face is unsightly and should be removed. However, I have spent many an hour looking for bolts that I KNOW are there. I cannot believe that

40-A

40-B

40-C

40-A – Comments noted.

40-B - Because the National Park Service is interested in receiving recommendations and advice from the Climbing Committee on some of these issues, portions of the plan were intentionally left unspecific. The Climbing Committee cannot be established until a record of decision is signed, and so some of these decisions will not be made until the National Park Service receives the input of the Climbing Committee.

40-C – In conjunction with the Climbing Committee, the National Park Service would evaluate all bolted climbing routes in the wilderness for appropriateness and for impacts to the resource and wilderness experience. Fixed anchors, which are determined to be highly visible, too close to sensitive resources, or in other ways degrade the wilderness experience, would be camouflaged or removed.

COMMENTS

average hiker is even aware that these bolts are there

The "cap" on routes also seems to be very vague. There is mention of 1998 level of climbing impact and the guideline to remain under this level. However, there is no detail on what this level is. In all, there is no assurances that new routes will be allow at all. | 40-D

I view this Supplement as a wonderful step in the progression to a plan that will benefit all who visit Joshua Tree National Park. It is obvious to me, however, that there is much more detail to be had in the implementation. Currently, too much in the Supplement depends on the goodwill of the Park Service. Upon this goodwill, unfortunately, the climbing community has not been able to depend.

If you want any further information from me, concerning my feeling about this or any other matter concerning the park, feel free to contact me.

Thank you for your time,

Thomas J. Murphy
TJM Consultants
261 Nieto St.
Long Beach CA 90803
murphy@accelenet.com

REMARKS

40-D – The objectives of the plan are to keep the cumulative impacts of climbing in the non-wilderness areas of the park to acceptable levels and to keep the cumulative impacts of climbing in wilderness to levels at or below 1998 conditions. The Council of Environmental Quality (CEQ) regulation (1502.2) provides for developing a plan when information is incomplete or unavailable. Additional language that describes the process the National Park Service is using to obtain the needed information has been added in the introduction to the climbing management section of the plan on pages 39 and 40.

Some of the specific numbers needed to quantify 1998 conditions were unknown at the time the supplement was prepared. In 1999, however, the National Park Service initiated steps to obtain baseline information to gauge what the 1998 impact levels were. Initial surveys focus on determining the amount of land effected by social trails, identification of flora and fauna that live in the vertical ecosystems, and determining to what extent permanent fixed anchors are used in the developed zone and backcountry transition and wilderness subzones. The National Park Service is currently conducting surveys, based on stratified sampling methodology that will be used to approximate the number of bolted routes that are present within Joshua Tree National Park. Preliminary data indicates that there are approximately 3,475 bolted routes in the park and approximately 7,128 bolts. This approximated number will be used as a target goal and will be used by the National Park Service and the Climbing Committee in evaluating requests for new bolted routes.

304

56

J. KEVIN MEADOWS

5057 Marlborough Dr
San Diego, CA 92116

12/16/98

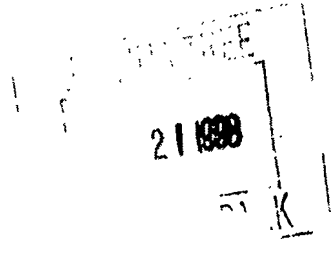
Superintendent, Joshua Tree National Park
74485 National Park Drive
Twenty Nine Palms, CA 92277

Dear Superintendent:

As a long time rockclimber and recreational user of Joshua Tree I am pleased to see the new draft for the Backcountry and Wildemess Management Plan. It represents much hard work and cooperation between the Park Service and recreational groups. It is my sincerest hope that the Park Service will implement the Plan in good faith, work diligently in conjunction with recreational groups to solidify the remaining issues in the Plan, and avoid unilateral decisions that alienate Park users.

Sincerely,

J. Kevin Meadows, M.S.
Hydrogeologist



41-A – Comments noted.

COMMENTS

55

JEFF PRICE
605 DOVER DR
SAN BERNARDINO, CA 92407

SUPERINTENDENT, JOSHUA TREE NATIONAL PARK
74485 NATIONAL PARK DRIVE
TWENTY NINE PALMS, CA 92277



TO WHOM IT MAY CONCERN,

I HAVE BEEN A MEMBER OF THE ACCESS FUND AND AN AVID ROCK CLIMBER FOR MANY YEARS. I DO NOT AGREE WITH YOUR NEW JOSHUA TREE PLAN REGARDING CLIMBING. I BELIEVE THE PLAN IS UNFAIR AND WOULD RESTRICT THE WRONG PEOPLE VISITING THE PARK. I KNOW FROM EXPERIENCE THAT CLIMBERS AS A WHOLE ARE VERY CONCERNED WITH THE ENVIRONMENT AND CONDITIONS THEREOF. I BELIEVE THE PLAN IS IMPRACTICAL AND EXTREMELY VAGUE.

OUR WILDERNESS IS THERE TO TOUCH, TO USE, TO ENJOY AND APPRECIATE. PLEASE DO NOT RESTRICT THE USE OF THE PARKS. CLIMBING IS A BIG PART OF MY LIFE. DON'T RESTRICT SOMETHING AS SIMPLE AND BEAUTIFUL AS CLIMBING A ROCK.

THANK YOU FOR YOUR TIME,

REMARKS

42-A – Comments noted.

COMMENTS

REMARKS

306

December 15. 1998

Kevin Emmerich
P.O. Box 51
Death Valley, CA 92328

Superintendent
Joshua Tree National Park
74485 National Park Drive
Twenty nine Palms. CA 92277

To whom it may concern.

I would like to submit this comment letter on the Supplemental EIS to the Backcountry and Wilderness Management Plan.

I have already made comments on this plan and I am disappointed that there is now an alternative E. This new alternative seems to be caving in to the pressure of the rock climbing groups.

Allowing new bolts within wilderness is a violation of the Wilderness Act
Allowing new bolts in non wilderness is an esthetic eyesore.
I think that many existing bolts should be removed. not replaced.

Alternative C. Maximum Protection is what I would support

The National Park Service has a responsibility to provide access to the public. but not at the expense of protecting the natural resources. Rock climbing is a fun activity. but has gotten out of hand in Joshua Tree. Many of these people feel that the park is there for them alone. They can be very noisy in the campgrounds and are an elite special interest group. I have moved my campsite in the past to get away from the noisy ones. Please do not compromise Joshua Tree for these people only.

Joshua Tree has an outstanding record of resource protection. Please do not change that.

Thank you for allowing me to comment.

Kevin Emmerich

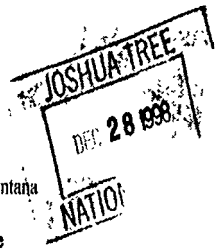
J 7 1998

43-A – Comments noted.

COMMENTS

REMARKS

Thomas Matthews
4610 E. Catalina Drive
Phoenix, AZ 85018



94

rec. camp

24 December 1998

Superintendent Ernest Quintana
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Re: Supplement to the draft Backcountry and Wilderness Management Plan

Dear Superintendent Quintana,

Thank you for working with the climbing and environmental communities to improve the rock climbing portion of the draft Backcountry and Wilderness Management Plan. I believe that the Supplement's New Proposed Action, Alternative E, can preserve the quality and safety of Joshua Tree's rock climbing experience while protecting Park resources for future generations.

I believe that the Supplement can and should be improved, however, specifically by stating that Joshua Tree National Park management will:

- maintain a cooperative approach with the climbing community (e.g., Friends of Joshua Tree, the Access Fund) to identify and resolve potential problems early and quickly
- seek to implement the least restrictive measures necessary to address resource impacts (e.g., establish trails, improve or add signs)
- require that decisions to restrict rock climbing (e.g., removal of routes, determining yearly new route "cap" limits) be based upon objective and verifiable resource impact data

I believe that these recommendations are consistent with National Park Service planning guidelines and will improve the overall acceptance and ultimate success of the Supplement.

44-A

I also want to express my disappointment in the Supplement's failure to increase the number of designated camp sites within the Park. Finding a camp site is nearly impossible on spring and fall weekends. Joshua Tree continues to attract more visitors ever year, especially now that it is a National Park, making the task of finding a camp site daunting. I believe that the Park Service should reconsider its decision and increase the number of camp sites. I believe that there are several minimal cost and low impact options, including the establishment of a walk-in campground. I urge the Park Service to increase the public's opportunity to spend the night in Joshua Tree's unique environment.

44-B

Sincerely,

Thomas

44-A – Comments noted.

44-B – The issue of designated campsites within the developed zone lies beyond the scope the scope of this document. It was addressed in the 1995 *General Management Plan.* The plan does call for the study of a primitive auto camp within the Backcountry transition sub-zone of the Little San Bernardino Mountains. See page 46.

COMMENTS

REMARKS

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December 24, 1998



95

Superintendent, Joshua Tree Park
74485 National Park Drive
Twentynine Palms, CA 92277

Robert E. Steward
7056 Middlesbury Ridge Circle
West Hills, CA 91307

Dear Sirs:

My wife and I will celebrate our 30th year of enjoying Joshua Tree on New Year's eve 2000. For a good portion of these years, we have come to JT, as we call it, two to three times a month. So, I am very pleased to have the opportunity to comment on the Backcountry and Wilderness Management Plan.

45-A

Since JT's becoming a Park, some long-needed, simple, but environmental significant improvements have been made. Turning the generator off at Cottonwood Spring was one of them. I'd like to propose another, long-needed, simple and significant improvement.

Let's put an inverted collar around the base of the light on top of the microwave tower that overlooks so much of the Park. Properly positioned the collar would block the stray illumination that reaches the ground of most of the Pinto Basin and a large area to the west of the tower, while allowing the light to be seen from the air.

45-B

I've attached a map of my estimation of the area of the light pollution from this one source. This one light ruins the wilderness "feel" for literally hundreds of square miles.

One might investigate, too, other ways to minimize the impact of this intrusive structure e.g. paint it a better color, lower its height, etc. Preferable, of course, is to take this tower and the other one farther to the west out of the Park as inappropriate to the mission of the Park.

Thank you for your consideration of this suggestion. I applaud most other aspects of the plan, and my wife and I are sincerely pleased that the battle to achieve "Park Status" was successful.

Sincerely,

Robert Steward

Robert and Dian Steward

45-A – Thank you for your comments.

45-B – The National Park Service received Belle Mountain, the location of the microwave tower, from the Bureau of Land Management (BLM) as part of the California Desert Protection Act in 1994. The microwave tower was authorized under a BLM right-of-way. When the National Park Service received the land, we also inherited all the existing permits for the land and the conditions of those permits. We have discussed options to reduce the profile of the tower with the permittee, but any changes must be mutually agreeable. At this time, the permittee has not agreed to any modifications.

December 31, 1998 163

THIS LETTER CONTAINS:
PUBLIC REVIEW OF "SUPPLEMENT TO THE DRAFT GENERAL MANAGEMENT PLAN AMENDMENT & SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT"
-- *public response*

JOSHUA T
JAN - 4 1999
NATIONAL PARK

FROM:
Albert A. Hoffman, individual
10209 Nile Drive
Cupertino, CA 95014

TO:
Superintendent, Joshua Tree Park
74485 National Park Drive
Twentynine Palms, CA 92277

Dear Mr. Superintendent,

Thank you for sending me the Supplement. I have reviewed it and have the following responses to particular sections. My most important concerns have to do with (1) providing for growing park usage by creating additional and sorely needed facilities; (2) "reclamation" activities that remove important historical or cultural artifacts; (3) construction projects in wilderness zones.

I believe the plan needs correction and/or further refinement in these areas. I plan to write my senator regarding my concern that the Park Service is not providing recreational opportunities in proportion to the growing U.S. population, despite being given much additional land on which to do so.

Regarding NPS reclamation and wilderness projects, I hope park management is made aware of the downsides of these activities and reconsiders them.

I hope this input is relevant and helpful to you in your management of this important park. Please keep me informed.

46-A

Sincerely,

Albert A. Hoffman

Albert A. Hoffman 12/31/98 alhoffman@aol.com

46-A – Comments noted.

340

Automobile camping (pp. 3, 32) - The growth of the park is partly mandated by growth in the general population. To accommodate this and avoid overcrowding in existing campsites (already a severe problem due to park management's neglecting to provide for growth in demand), it is imperative to add new campgrounds, including in the new lands. Auto camping in the new lands, especially in the new southwestern section, should be studied and eventually permitted as a part of this plan. The new land should eventually be managed with the same rules as the pre-existing park land; otherwise, campgrounds and other developments will become *too crowded in old sections* and too sparse in new sections. A sentence on page 32 says the new land will be managed in the same way as old land; I don't see this being followed through in the rest of the document, which describes very little "spreading out" of the resources from old lands to new lands.

46-B

Reclamation - various sections - "Restoration" of old roads and trails, and removal of human artifacts, is actually a destruction of the visitor experience. Some visitors, including myself, relish discovering these old artifacts from pre-1900 miners, post-1900 ranchers, and even the more recent artifacts that will attract our descendants in the way old mines attract us. So, this "reclamation" is actually destroying the cultural heritage of the park. It is also *expensive*, *noisy* and *disruptive*, and impossible to do perfectly. Instead of an interesting historical artifact, therefore, one is left with a still-disturbed area that is probably uglier, in a subtle way, than the original.

There is plenty of park land where one can enjoy a pristine natural view (indeed, most of the park is wilderness); no need to spend money "reclaiming" areas that are best kept as historically or culturally enjoyable.

I am alarmed by and opposed to reclamation.

p. 18 - Lost Palm Canyon waterline
As a hiker whose enjoyment is the discovery of human artifacts of past use of the desert, I object to the removal of this waterline. With most of the park dedicated to wilderness, there is not need to either "restore" or designate as wilderness this interesting canyon.

p. 27 - roads
It will be very difficult to return a road to its natural desert hard pavement condition. This section makes it sound more like a landscaping project.

p. 44 - social trails
Many of these trails are so old they predate white men. It would be criminal to destroy our native heritage by eliminating these trails.

46-C

Albert A. Hoffman 12/31/98 alhoffman@aol.com

46-B – The development of new campgrounds within the Developed Zone lies beyond the scope of this document. It was addressed in the General Management Plan. The sentence referred to on page 32 states, "The land added in 1994 would be managed in the same way and to the same standards as the land in the former monument." Thus, the lands would be managed as the former Joshua Tree National Monument, not as Bureau of Land Management land. However, the plan does call for the study of a primitive auto camp within the Backcountry transition sub-zone, see page 46.

46-C – Prior to any reclamation activities, a comprehensive analysis according to the National Environmental Policy Act and the National Historic Preservation Act would occur. Cultural resources would be evaluated to determine if they were historically significant or eligible for inclusion on the National Register of Historic Places. If determined to be eligible, a variety of management prescriptions are available to the National Park Service. The comprehensive analysis evaluates all of the laws and policies under which the National Park Service manages Joshua Tree National Park.

COMMENTS

NPS operations in wilderness areas (p. 19, 27) - NPS proposes to lock up most of the park for most public activities, yet desires to ruin the wilderness definition with its own wilderness trails and reclamation projects, and with its own motorized equipment, extensive soil disturbance, pollution, unsightly materials dumps, and mess. I have seen this in Yosemite: cables strung through pristine woods, shacks with piles of building materials, and lots of noise. I do not expect any less of these proposals in the Joshua Tree wilderness areas. These wilderness projects seem to perpetuate themselves to such a degree that there will never be any peace and quiet in the wilderness. Calling these projects needed for "safety" or "administration" is ridiculous in an area that has its natural dangers and is best administered by not disturbing it. The proposed wilderness trails are no less an evil than the *World War II tank tread* marks that inspired the 1994 growth of the wilderness areas in the first place. I most strenuously oppose all NPS activity in the wilderness areas to the same degree that all public activity is restricted. Otherwise, if one permits an NPS "exception", there will be no wilderness experience.

I also urge NPS to limit official park-related commercial vehicle traffic throughout the park. NPS's various projects in the park are likely to generate a stream of dump trucks, construction haulers, and other polluting and noisy vehicles traveling along routes where many people will be disturbed.

46-D

Wilderness (p. 19, etc.) - Some of the new wilderness designations do not make sense; in general, more land should be earmarked for future development.

Lost Palm Canyon - with most of the park dedicated to wilderness, this canyon would be best left as a hike to view an old waterline. I propose not removing the waterline and not designating the canyon as wilderness.

Wilderness addition #5 - since it contains roads, and is proximate to high-intensity and auto use, it would be best zoned as development or backcountry. It would be an excellent space for much-needed new auto campgrounds.

Cottonwood mountains proposed wilderness area- I strongly object to "locking up" this very favorable area, which is ideal for recreational and scenic development. Rather, a scenic drive should be allowed and eventually be constructed around its southwestern perimeter.

Albert A. Hoffman 12/31/98 alhoffman@aol.com

REMARKS

46-D – Comments noted.

COMMENTS

Growth in overall park usage demands these additional facilities; otherwise, there will be a "Yosemite" problem of too many visitors and not enough places to put them -- and that would be a very ironic problem in this expansive desert area!

Trails (pp. 19, 52) - Trail development in other national parks has proven obnoxious. Witness the cement sidewalks in Zion. They ruin the natural hiking experience. I do not know what the proposal means by a "defined tread", but I suspect the hiker will be guided along as if on an escalator, and dare not break a rule to walk over its boundary and see a flower. Federal rules will eventually require wheelchair access and the recreational experience will be over. I would urge that trails be maintained as natural paths. They could be marked with rock monuments, *not* logs, signposts, or white chains.

New trails will be developed around historically important cultural areas such as Lost Horse Mine. I strongly object to any disturbance of the soil, rocks, or landscape within sight of these historical areas. Such disturbances would degrade the esthetic experience and would ruin photographic opportunities -- as surely as would an airplane in a Western movie.

46-D

Backcountry camping (p. 20) - Registration and permit requirements, and parking restrictions, will cause unnecessary problems for backcountry campers. Backcountry campers sometimes arrive late at night. Registration boards are not always conveniently placed or made easily visible. Permits are not available at odd hours. Parking only in registration locations invites burglary and concentrates campers: this is antithetical to the backcountry camping experience, more akin to camping in the developed campsites. Cottonwood is an excellent camping area and its use should be encouraged, not restricted. All of these restrictions hinder the usage of the park without enhancing the preservation function.

46-E

Bicycle use (p. 24) - Cross-country bicycling is a valid form of recreation and should be permitted, at least in some area of the park. Development of bicycle trails, as described in the plan, is commendable.

Re-routing the .5 miles of Berdoo/Thermal Canyon bike trail away from the wilderness area: wouldn't this be expensive and disruptive, compared to simply excising this tiny and arbitrary corner from the wilderness designation? I object to this re-routing on the grounds that it will create yet another disturbance (see Wilderness impacts section).

46-F

Albert A. Hoffman 12/31/98 alhoffman@aol.com

REMARKS

46-E – Comment noted.

46-F – The new proposed action (alternative E) designates 14 backcountry self-registration boards. All overnight campers in the backcountry and wilderness would be required to park and register at one of the 14 backcountry board locations. Requiring visitors to park at these locations and register for backcountry use serves as least three critical functions: backcountry users have the opportunity to learn about the rules and regulations of the backcountry; the National Park Service can track and monitor backcountry and use; and probably most importantly, registration provides for visitor safety. If visitors do not return by the date listed on the permit, search and rescue operations can be launched.

COMMENTS

Bolts (p. 28) No comment except to say that my "visitor experience" has never been impacted by the sight of an ugly bolt. I would hope that bolt restrictions based on "visitor experience" impacts will be realistically evaluated.

[End]





Albert A. Hoffman 12/31/98 alhoffman@aol.com

46-G

REMARKS

46-G – Comment noted.

314

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LENHOFF & LENHOFF

December 19, 1998



Superintendent
Joshua Tree National Park
74485 National Park Drive
Twenty Nine Palms, CA 92277

22 1998
NAT

RE: BACKCOUNTRY AND WILDERNESS MANAGEMENT PLAN

Dear Superintendent,

My wife and I have several comments to your latest plan:

The Lost Palm Canyon site has waterlines that have been abandoned and rusting. Aside from the inherit dangerous and liabilities of lacerating a visitors skin and resulting in Tetanus, they are impacting the microhabitats, including flora and fauna. It has impacted our experience and conflicts with our wilderness values.

We are opposed to any Stock Use on any trails because of Horse defecation. Horse defecation has degraded soil and vegetation resources, and is impacting the microhabitats, including flora and fauna. It has negatively impacted our experience and conflicts with our wilderness values. 47-A

We are opposed to any Four Wheel Drive Vehicle Use on any trails because of intensive use has degraded soil and vegetation resources. Four Wheel Drive Vehicle also disrupt the natural pattern of rock and lichen.

In closing, the new Backcountry And Wilderness Management Plan should treat any expansion, or revisions to the current plan, on a "favored-nations-basis" to any/all areas of expansion, revision, extension, renewal, modification, etc. The language should be consistent, clearly defined and applicable to every activity. Unfortunately, the current plan is too vague and prejudicial to Climbers.

Respectfully,

Lisa & Charles Lenhoff

9200 Sunset Boulevard, Suite 1026, Los Angeles, CA 90069
Telephone (310) 550-3900 Fax (310) 550-3985

47-A – Comments noted.

John Charles Woods
5192 Huntswood Cir.
La Palma, Calif. 90623
(714) 739-4514

1998

December 9, 1998

Superintendent, Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Thank you for forwarding a copy of the Joshua Tree Management Plan supplement. The proposed alternatives are evidence of your concerted effort to address some complex issues. My views on the bolting issue are already in your possession and need not be belabored, despite the inference from the several alternatives presented) that you have been heavily lobbied by pro bolting enthusiasts.

I will remind you of the one issue that seems to hold the greatest anti-bolting leverage: The liability of the Park Service for any accident involving sanctioned bolts or involving climbing routes designated by the existence of sanctioned bolts. It is simple for climbers to distance themselves from litigation in a bolt-involved accident and the Park Service will be left "holding the bag. Consider this carefully before bowing to pressure from those who have nothing to lose and will certainly refuse to accept responsibility for the bolts they place so capriciously.

48-A

I would recommend scrutinizing the other climbing issue alternatives within the context of enforcement. It is a fool's errand to initiate a policy, which from the outset, cannot be enforced. Most of the alternatives, particularly Alternative "E," fall into this category through the default of manpower and economic restrictions.

48-B

I would also suggest that the proposed climbing committee is a Pandora's box that the Park Service should be extremely reluctant to open. The precedent of validating vocal but minor special interest groups is a dangerous policy. Such input is better done on an irregular, per-need basis. You might refer to the elaborate and ineffective attempts to manage the Cave of the Winding Stair in the Providence Mountains. During the 1980's, strict and highly detailed vertical policies were instrumented using climbers as consultants. The result was a headache for both Park administrators and cave visitors that continued for years. Those policies were ultimately dropped.

48-A – The National Park Service recognizes that a portion of its mission is to provide for visitor enjoyment and that that enjoyment may also be potentially hazardous. The recreational activities of some visitors may be of an especially high-risk, high-adventure type and may pose a significant personal risk to participants. Park visitors must also recognize this, and they must assume a certain degree of risk and responsibility for their own safety when visiting areas that are managed and maintained as natural, cultural, and recreational environments. The very nature of climbing requires participants to assume responsibility for their safety. See page 46.

48-B – Comments noted.

COMMENTS

One climbing specific issue remains unaddressed in my previous correspondence. If a climber is allowed to utilize power drills to ease the labor of climbing, will I be allowed to use a chain saw to ease the labor of my wood cutting (wood brought in from outside the Park or course!) for my evening campfire? Will I be allowed to use power tools to ease the labor of setting up my tent, to inflate my air mattress? Being forced to walk through wilderness areas is certainly more difficult than driving and I might need the assistance of a number of labor saving devices. These are matters of convenience and not necessity, as is the use of power tools for bolting. A true wilderness experience is difficult enough to come by in Joshua Tree National Park without this nonsense. I also suggest that manual bolting is inherently self-restricting while power tools simply facilitate abuse.

48-C

While I have the "ear" of the Service, I wish to add one more proposal to your already overloaded agenda. One of the most common complaints of visitors to the Park (my informal survey), are intrusive noise and activities in campgrounds. I see an opportunity for Joshua Tree National Park to take the lead in addressing this problem. While implementation may be difficult, I suspect that the effort would prove worthwhile.

I propose that a single, primitive campground in the park be designated as a "quiet camp," "wilderness camp," or "courtesy camp." This means simply: No excessive noise, at any time for any reason. No radios that can be heard outside of a vehicle, no campfire songs, no parties, no barking dogs, no loud barbecues, no intrusive games (frisbee throwing, ball games etc.) and an early evening noise curfew which exempts only normal conversation and activities. This proposal does not target or limit R.V. or van camping in favor of tent camping, it limits only the intrusions that are common in ordinary campgrounds. Vans and R.V.s would not be allowed to run generators but could easily exist on battery power while in the camp. Batteries could be charged during normal Park activities away from the camp. This is an exclusion of noise, not people. It is an attempt to maximize the simple courtesies of good neighbors and the benefits of a true desert experience.

48-D

I realize that most of what I propose is officially "on the books" already, but the Park reality is that without a specified area, most campers are still at the mercy of those who rely on the lack of a "resident" ranger, to abuse the rights of others. I cite the case of the South fork primitive camp in southern Sequoia National Park. For many years, a resident ranger was present during the summer months and the little known camp was eagerly sought out as a place of solitude. Trouble was virtually unknown and noise was not an issue, ever! When budgetary concerns forced the removal of the ranger, vandalism and noise problems forced the nearly daily presence of the ranger anyway. Nearby Clough Cave was severely damaged by vandals and the cost to the Park was excessive. I do not suggest that vandalism is the inevitable result of unsupervised campgrounds, but I do

REMARKS

48-C – Power drills are prohibited in wilderness. Only requests for the use of a power drill in the developed zone or the backcountry transition subzone will be considered on a case-by-case basis. Individual requests to use a power drill must obtain a special use permit from the Office of the Chief Ranger. The Chief Ranger will review the completed application and, if warranted, submit the permit to the Superintendent for review and approval.

48-D – The National Park Service is currently evaluating a number of options to address the issue of noise in campgrounds. A possible solution being considered is extending quiet hours from one hour after sunset to one hour before sunrise.

COMMENTS

REMARKS

suggest that a designated "quiet" camping area would provide a choice between a semi-wilderness experience and that of ordinary campgrounds, for car, R.V., and tent campers. I propose also that the incidences of illegal camping will be reduced if people have some assurance that they can look forward to some peace and quiet in a legal campground. A simple poll of campers might substantiate what I have so often heard: "I hate camping in the campgrounds. They're too noisy." The area near the Lost Horse ranger station might be one possible location for such a camp because the resident ranger facilities are already in place.

Many years ago, such a policy was initiated by the National Speleological Society to be implemented during their national conventions. These are attended regularly by thousands of people camping in close proximity. When a distinct "quiet camp" (as distinguished from the "noisy camp") was designated, it immediately became the camp of choice. As in Joshua Tree National Park, the noisy folk were in the vast minority.

Realistically, I would hope that one Park campground could be specifically and firmly designated as a haven from the noise of radios and the excesses of people who consider National Park campgrounds as an extension of their own backyard, rather than a co-operative, public place. The right to sit in a campground and read in peace, to enjoy the solitude of the desert, is the fundamental goal of this proposal and a fundamental right of those who visit a National Park. Those seeking such an experience should not be driven into the backcountry as a penalty for their desire for silence. I believe that given a clear choice, most campers would willingly agree to such restrictions. Most visitors not only practice such policies anyway, they crave them. It is also possible that if visitors were informed of the alternative, a guaranteed "quiet camp" might become the Park's first-choice campground. I also suggest that visitors would be willing to pay a reasonable fee (not now required at regular campgrounds) for the privilege to camp in guaranteed solitude - I would! At a minimum, this would be a very revealing experiment and might be a policy that would be adopted by other Parks "following the lead" of an innovation first attempted at Joshua Tree. Obviously, this would require a higher degree of regulation in the beginning, but once the precedent is set, those who desire a more social atmosphere, would use the ordinary campgrounds.

Thank you for taking the time to hear my comments. If I can be of service to the Park in any way, feel free to call or write.

Sincerely,

John Charles Woods

COMMENTS



59

P.O. Box 2277
Yucca Valley, CA 92286

December 19, 1998

Superintendent, Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

Dear Mr. Quintana:

I would like to take this opportunity to thank you and your staff for the fine work done in producing a good Backcountry and Wilderness Management Plan. As you are aware, my area of special concern has been the Hiking and Equestrian Trails portion of that plan. I am pleased with the outcome, but would like to offer the following comments in regard to the new proposed action alternative.

1) With the adoption of the West Access Loop, it would seem appropriate to move the end of the North Side Trail slightly east onto the tread which receives the majority of use, instead of using the connector to the Middle Burro Trail. Since the MBT is to be closed and that portion of the NST is used only for access to MBT, why direct users to that way?

2) There is no call-out of the "North Canyon" trail in the descriptions, but it is shown on the map. I presume that this is the 1.2 mile trail subject to maintenance and resource management review. Please note that this trail receives a lot of use and is in far better condition than the Boy Scout trail, which already is a dedicated horse trail. Equestrians in the Indian Cove area would be thrilled, as would others, if it was as good as North Canyon.

49-A

3) The revised proposed action still contains overlapping mileage of various trails, inflating the claimed total on the order of 50 miles. (Refer to my response to the previous draft for details). It also contains other errors, most previously mentioned, but still uncorrected. Please consider the following short list:

49-B

a) The Deerhorn Trail is accessible from mile 31.9 and 33.9 (not 32.94).
b) Covington Loop Trail, please rate it M due to several climbs.
c) Covington Crest, please rate it E. (The difficult portions were deleted)
d) West Access Loop- 1.7 E (The 1.2 miles given in the draft is the increase over West Access on the south side only, no longer listed).
e) Panorama Trail- 3.3 MS ... and ends at the Bigfoot trail 0.9 mile south of the south side connector trail.
f) Johnny Lang Corridor- 3.2 miles (E), ...ends at the end of the canyon where the Ryan Lang connector trail begins. (Not Ryan Mountain connector; is shorter and easier than specified).

49-C

4) The stock regulations in regard to proximity to water sources appears to be a problem in Black Rock canyon, with the trail going right by the spring. While shown as dry on USGS maps, it does flow from time to time. The concern is that this will be used as an "excuse" to close the trail. Please make provision in the plan so that such will not occur. In very wet years, the potential for mass closures exist, especially if future park managers are bent on strict enforcement of the regulation.

49-D

*1. (not allowed to stop/stand within 200 ft of water)
2. (Trail Mtrs) Need to re-count miles

REMARKS

49-A – Comments noted.

49-B – Mileage for trials listed in Appendix A are for the specific trails being described, which is often measured from one trail intersection to another. The National Park Service recognizes that in some cases trails overlap, but the purpose of the trail descriptions in Appendix A is to give the user information about a specific trail.

49-C – Changes made.

49-D – Comment noted. This restriction is probably most needed during the wet years when the most potential for stock use resource damage exists. The plan provides for stock use within the confines of an established trail or corridor and prohibits stock use within 200 feet of any spring or artificial water source.

COMMENTS

Thank you for considering the public input on the draft plan, and again for this opportunity to comment on the revised proposed action alternative. Inclusion of the missing portion of the Cliff Trail (Black Rock vicinity); the West Access Loop, Cactus Cove View spur, viewpoint spurs on the Burro Loop and North View trails, minor rerouting of the Panorama and Quail Springs Historic trails, and serious consideration of North Canyon (West entrance vicinity); the Lost Horse mine, Wall Street mill, Fan Canyon view, and Face Rock spurs (Ryan vicinity), in addition to all the other good trails, is what has put it together for me.

I do regret the loss of Baseline Loop from Panorama heights, forcing access only through BLM section 5; the loss of the Cabin trail, the Queen Well historic road, and other routes of lesser importance, but find that I can support the park with the system as configured (with the inclusion of North Canyon). I look forward to being able to assist the park in maintaining, patrolling, and educating the public about the trail system as a National Park Service volunteer. Thanks again for your support.

Sincerely yours,

Howard Simpkinson

Howard Simpkinson

49-E

REMARKS

49-E – Comments noted.

ALAN SIRACO
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370 Grand Avenue, Suite 5
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(510) 836-2574

4

December 31, 1998

Superintendent, Joshua Tree Park
74485 National Park Drive
Twentynine Palms, California 92277

Re *SUPPLEMENTAL TO THE DRAFT MANAGEMENT PLAN AMENDMENT, SUPPLEMENTAL EIS*

To whom it may concern!

I am a desert hiker who enjoys minimum impact hiking and camping. I am a former rock climber, and a current member of Desert Survivors, a non-profit desert conservation and education organization. I have camped in Joshua Tree and hiked in the lands in and around the park. I have also participated in our organization's volunteer service projects the object of which is to remedy degradation to desert areas with high wilderness value. I am writing solely to provide comment regarding the climbing provisions contained in your new proposed alternative "E".

I wish to thank you for the opportunity to comment on the supplemental draft, and to commend what appears to be a valiant effort to accommodate vocal opposition from the climbing community while preserving some amount of regulation on the use of fixed anchors. However, I believe that your resolution of the issue ignores the fact that conceptually a fixed anchor is an improvement which is incompatible with wilderness values.

Your original draft proposed alternative achieved a balance which permitted use of fixed anchors with a graduated amount of regulation in developed and the back-country transition zones and in non-wilderness areas generally. It also recognized the need to distinguish between replacement of existing bolts and installation of new ones. Thus, while not providing maximum protection, overall, desert conservationists and wilderness protection organizations could be confident that under the proposed action, further incursion into wilderness areas would be minimized.

Your new proposed alternative appears to give much greater latitude to climbers who wish to use permanent bolts in wilderness areas. Replacement throughout the park will be allowed without permit, and new anchors will be allowed on a limited permit basis even in wilderness areas. This is fundamentally at odds with the concept of

50 – A more thorough discussion of wilderness, prohibitions in wilderness, and the exceptions to those prohibitions for the administration for the purpose of the Wilderness Act has been added to the wilderness subzone section on page 22. The National Park Service is considering a permanent fixed anchor to be more consistent with a trail through wilderness than paved road.

The permanent installation of bolts in wilderness may be considered an exception to the prohibition of permanent installations in wilderness if the bolts contribute to the administration of the area for the purpose of wilderness. Trails through wilderness can provide for user safety and confine impacts to defined areas as they provide access through wilderness and provide for the enjoyment of wilderness itself. Thus, the installation of bolts can provide for climber safety, limit impacts, and provide access to climbs of exceptional quality that enhance the user's ability to experience a primitive and unconfined type of climbing experience. This language has been added to the discussion of new bolts in wilderness on page 43.

wilderness.

No development or improvement should be permitted in wilderness areas.. A fixed anchor route is no less an improvement than a ladder, paved walkway, or even a road. The difference is merely in degree of improvement. That is, while there may be a *quantitative* distinction, there is no *qualitative* distinction between a fixed-anchor route and a road, from the perspective of wilderness preservation.

This concerns me, because once the exception is made for improvement for climbers, then OHV users may feel justified in making slight incursions into wilderness or roadless areas. Additionally, those *requiring* improvements to access back country wilderness, such children or the elderly may also feel justified in demanding paved pathways. It is a slippery slope, that once embarked upon can ultimately lead to the elimination of wilderness.

If this sound alarmist, just try to make the logical distinction between a climber that needs permanent technological assistance to ascend a route and a geriatric who needs a walker to traverse a valley. If we agree that wilderness preservation is desirable, then we must face the possibility that some people will be limited in their ability to enter deeply into it. There is sense to the view that one should not be attempting to go where he or she is physically incapable of going without permanent technological assistance. That view should apply equally to climbers as to anyone else.

The climbing community would not be adversely impacted by this policy, because there are ample routes available to climbers using temporary protection pieces that rely on naturally occurring cracks in the rock. Indeed, I know climbers who eschew the use of any type of protection. While free climbing may not be for everyone the line should be drawn at the use of temporary anchors, and no replacement of existing anchors or installation of new ones should be permitted in wilderness areas.

For these reasons, I urge you to adopt the climbing provisions of alternative C for maximum protection, or at least those of your original draft proposed action (alternative A).

Sincerely,

Alan Siraco

COMMENTS

REMARKS

923

mm

February 26, 1998

Joshua Tree National Park
74485 National Park Drive
29 Palms, CA 92277

Subject: Comments on Draft Backcountry and Wilderness Management Plan, Supplemental Environmental Impact Statement

I have reviewed the above referenced document and have the following comments:

1. The document should analyze the effect of the increased visitor usage on the ecosystem in a quantifiable manner. This would include the increased air emissions including dust, traffic, noise, and night lighting resulting from millions of visitors per year. — 51-A

2. The document should analyze the effect of increased visitor usage on the peace and solitude available in the Park. — 51-B

3. The document should discuss the difference in how wilderness and non-wilderness lands are managed. What impacts are permissible in wilderness areas as compared to non-wilderness areas? Is noise and night lighting acceptable in non-wilderness areas? — 51-C

4. What impact will implementation of this plan have on surrounding non-Park lands? Will it inhibit or stop development? What cost will this have? An analysis should be done. — 51-D

5. What effect will increased visitor usage have on the desert tortoise? Is it acceptable to have household pets in the Park? How should they be controlled? — 51-E

6. What effect will the trash and debris left by millions of visitors have on the ecosystem? Please quantify? — 51-F

51-A – Impacts to air quality were evaluated during the development of the 1995 *General Management Plan.* Air quality problems in Joshua Tree National Park are associated with the regional airshed, which contains major population centers and power plants. Dust from dirt roads is not significant in comparison to the regional problems. Although visitation is projected to increase, none of the proposals under any alternative in the *General Management Plan* would significantly alter air quality.

51-B –Implementation of overnight group size limits in the backcountry transition of 25 and wilderness subzones of 12 will provide for the opportunity to find solitude in the park's backcountry. The Superintendent retains the discretion to adjust numbers based upon impacts to the resources or special needs. The Superintendent also retains the discretion to monitor day use and to establish group size limits for day use. See page 46.

51-C – Unless otherwise noted, rules and regulations for backcountry use apply to the developed zone and the backcountry transition and the wilderness subzones.

51-D – Impacts to surrounding communities were considered during the preparation of the park's 1995 *General Management Plan.* That process determined that impacts would be minimal and were not further analyzed.

51-E – The new proposed action (alternative E) implements the *Desert Tortoise Recovery Plan* and designates all of the natural zone within the park as a Desert Wildlife Management Area. All pets must be restrained while in the park at all times.

51-F – See 51-D.

7. The Desert Tortoise Recovery Plan (DTRP) recommends the use of tortoise fencing and culverts in areas of critical habitat. The DTRP indicates that much of the Park is considered a Desert Wildlife Management Area (DWMA) and has a high concentration of desert tortoise. This Draft Backcountry Wilderness Management Plan also indicates that the Pinto Basin has a high desert tortoise concentration. Since the DTRP recommends the use of fencing and culverts in such areas why does the Park not use such mitigation on existing roads in the Park to protect the tortoise population? 51-G

8. Why has the Park not made the tortoise monitoring data available to the public? 51-H

Thank you for your consideration of these important issues.

Sincerely,

Rick Morris

Rick Morris
72-631 Homestead Road
Palm Desert, CA 92260

51-G – The *Desert Tortoise Recovery Plan* states that "If fencing is not permitted within the Monument, expand the boundary of the Desert Wildlife Management Area to the boundary of the Monument." The new proposed action extends the boundary of the DWMA to the boundary of the national park. Thus, fences are not necessary to fulfill the *Desert Tortoise Recovery Plan*. The National Park Service will continue to monitor road mortality, especially in areas of high density. If warranted, additional mitigation measures may be implemented.

51-H – Tortoise monitoring data may be made available to the public upon request.

324

95

24 February 1998

Superintendent,
Joshua Tree National Park,
74485 National Park Drive,
Twentynine Palms, CA 92277

Dear Superintendent Quintana:

I have studied with considerable interest your well-prepared Back Country and Wilderness Management Plan. My comments are largely influenced by my daytime enjoyment of the Park on an average of four to seven times a month, nine months of the year, since we moved to Palm Desert two years ago. I have become familiar with much of the Park and contiguous areas under BLMmanagement. I have utilized virtually all of your open vehicular routes with my 4WD utility vehicle to drive= park-hike-explore destinations off the beaten track, especially those areas and sites involving old mines and geologic features.

52-A

52-A – Comments noted.

I find myself to be in virtually complete agreement with the "Proposed Action" alternative as delineated in the Study. Most significantly, in my estimation, that "Proposed Action" alternative provides Park Management with requisite flexibility and authority as it utilizes its initiative and available professional expertise to meet its challenges and responsibilities over a continuing period of many years and changing situations.

In my estimation the "No Action" and "Minimum Protection" alternatives would not provide Park Management with sufficient approved and promulgated policy and authority to effectively plan, protect and regulate this very rare ecological system. Conversely, the "Maximum Protection"alternative would not only unrealistically limit human enjoyment of the Park's attractions, but would also similarly seriously restrict Park Management's ability to fashion Park development over the years.

"Flexibility" - is the mandatory essential element, and only the "Proposed Action" alternative effectively provides it along with the necessary concomitant promulgated policy and authority.

Now, a few strictly personal observations and comments.

(1) Visitation

Visitation statistics can be deceiving if utilized in unweighted fashion to measure impact upon the whole Park area, as well as allocation of resources of all types.

52-B

52-B – Comments noted.

I note that a highly significant percentage of Park visitation makes a direct, virtually non-stop "motor tour" via its paved highways. This group clearly does not understand nor greatly appreciate the uniqueness and splendid opportunities of this Park. A large number do not even stop to view the roadside Exhibits. This is most unfortunate since they are uniformally informative, excellently presented and essential to an appreciation of the Park. Nevertheless, this category will continue to

COMMENTS		REMARKS
constitute large numbers of a continuing growth of visitation. Although they will continue to deserve full consideration and service, they will have relatively little effect upon the wilderness areas which will continue to be primarily utilized by considerably fewer, yet generally, more knowledgeable and appreciative Park "users" vis-a-vis simply "viewers".		
(2) Trails I agree with the "Proposed Action" alternative. However, for the paramount consideration of the safety of hikers, bicycles should be restricted to paved roads and so-called "road-trails" which are generally wider. Bicyclesrcan be especially dangerous to pedestrians on narrow trails. The Trail System as outlined in Figure 5 and Appendix D appears to be sufficiently comprehensive as well as predominantly located in areas of most common useage and interest. Possible exception is in the Cottonwood southern area of the Park. (See Addendum #1 re: Coyote Mine Trail). It would seem logical that by effective development, identification, description and marking of the mentioned selected trails (especially those described in various widely-used publications available in the Visitor Centers) a considerable reduction of aimless "social" and cross-country trails would result. This would also produce better protection of both the Park ecology and its visitors, many of whom being inexperienced with dealing with its sometimes potentially dangerous physical conditions -- less "wandering".	52-C	52-C – Comments noted.
(3) Roads I agree with all provisions of the "Proposed Action" alternative as outlined in Figure 6 and pages 35-36, albeit with a minor modification (See Addendum #2 re: Suggested Additional Open Roads). The Geology Tour Road is a fine example of what can be accomplished with these roads. Coincidentally, the availability of a reasonably simple geologic chronological "history" of the entire Park, for sale at the Visitor Centers, would be most useful and welcome.	52-D	52-D – Comments noted.
(4) Auto Camping Experience at other National Parks (as Yosemite) dramatically evidence that such campsites must not be allowed to proliferate since they will invariably continue to generate effective demands for further additional auto campsites to the detriment of the physical attributes, capabilities and purpose of the Park. Stick to what you already have---these sites tend to "breed". While there will always be a very vocal demand for further extension of auto campsite facilities, it must be constantly borne in mind that this Park has serious physical and ecological limitations directly pertinent to further auto campsite development. Additionally,	52-E	52-E – Comments noted.

COMMENTS

a significant percentage of Park visitation will remain to be of the "drive-through" category.

(5) Climbing Management

Closures

Group Size

Desert Tortoise Recovery

I believe that in all these cases the "Proposed Action" alternatives appear as reasonable compromises that appear to best meet this Park's purpose and continuing unique ecological and physical constraints and overall capabilities.

52-F

Finally, from my own personal and professional background viewpoint, it appears that the permanent addition of an appropriate sized and configured helicopter must be considered. It is essential for the purposes of effective patrol for protection and policing of this Park's extensive area, rugged physical and natural terrain features, as well as recovery of inevitable casualties, survey, observation and general utility (e.g. trail maintenance). These essential capabilities far outweight any objections of "noise pollution" and deprivation of "privacy".

Many thanks for this singular opportunity to express my views. I do enjoy this Park, and have learned to appreciate and "think brown" vis-a-vis "green" as appropriate to other areas.

Sincerely,

W.J. Howatt

Col. W.J. Howatt USMC (Ret'd)
167 Camino Arroyo South,
Palm Desert, CA 92260

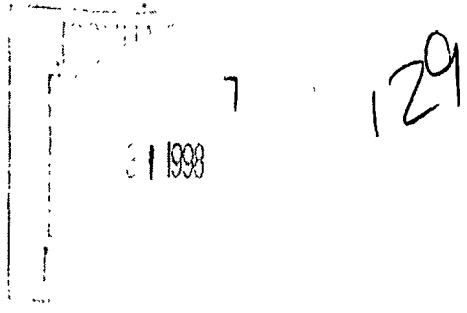
(760) 776-8064

REMARKS

52-F – Comments noted.

COMMENTS		REMARKS
ADDENDUM #1: Development of a Trail to Coyote Mine Recently I hiked to Coyote Mine site (NE¼ Sec 21 T5S-R11E). There is little functional remaining about its site, but it is a "destination" that is identifiable and holds the sometimes nebulous but always intriguing connotation of "mine". The scenery however, particularly on the higher ground, is quite interesting. The road-trail remnants (see Cottonwood Spring 15 minute series topo map) are in generally good, recognizable shape, and provide for reasonably safe hiking of moderate difficulty for all ages. It only requires marking by a few trail posts. It would certainly add an easily established, additional, needed inventory to the Cottonwood general area. It starts at a locked service road gate about one and seven-tenths miles S of Cottonwood Visitor Center (to I-10), thence WNW up ravine approximately one and one-half miles, thence S and then SSE on high ground about nine-tenths mile to the mine site.	52-G	52-G – This trail has not been included in the designated trail system, but that does not prevent visitors from travelling to it cross-country.

COMMENTS		REMARKS
ADDENDUM #2 Suggested Additional Open Roads		
(1) Snow Canyon Mine Spur Snow Canyon Mine is a somewhat interesting identifiable "destination", as well as providing some interesting natural geologic features somewhat nearby;	52-H	52-H – We have no knowledge of a "Snow Canyon Mine," however, the spur road to the "Snow Cloud Mine' is designated as open to vehicular use
(2) Rockhouse Canyon Road Is in an existant Back Country Transition Subzone, and unless significant flora or fauna ramifications dictate otherwise makes for a very effective link between Berdoo Canyon - Thermal Canyon - Pinkham Canyon Roads. As a link it could reduce roundtrip traffic and wear on those roads by allowing single trip of these "outback" interesting areas.	52-I	52-I – The Rockhouse Canyon Road received a great deal of consideration to be left open. Based upon to conditions of the road, the potential for resource damage, and safety concerns, the new proposed action (alternative E) closes the road to public use.
(3) Mission Well to Mystery Mine Reopening of a former road (PintoBasin 15 minute topo map 1963) from Mission Well to vicinity Mystery Mine - with trail E and S to Placer Canyon could provide a safer route for long vehicles to that area than utilizing the sandy wash portions of the Grubstake Canyon Road. (NW¼ Sec 35 T2S.R12E - to - vic center Sec 16 (projected) T3S.R13E)	52-J	52-J – The road from the Mission Well to the Mystery Mine transits congressionally designated wilderness and is by law closed to vehicular traffic.
Besides the Mystery Mine complex, Placer Canyon -both within and without the Park Boundary contains a significant number of mining sites as interesting "destinations", which although apparently containing no mineral assests of commercial value are always interesting to hike to in order to observe previous mining activity and to observe (not remove) interesting mineral specimens; BLM Chuckwalla Map does indicate a portion of this to be privately owned (at least as of the date of that map), the absence of other roads and trails into the area (especially from the former Kaiser holdings) would indicate that this is not a significant factor.		
(4) Geologic Tour Road Recommend that its apparent two-way portion to continued to the BackCountry Registration point in Pleasant Valley. This would preclude the necessity of continuing on the one-way portion for those whose activities were in the Pleasant Valley area.	52-K	52-K – Comments noted.



Superintendent
Joshua Tree National Park
74485 National Park Drive
Twentynine Palms, CA 92277

RE: Alternative E of the Backcountry Management Plan – New Proposed Action

Dear Sir:

I am writing on behalf of the Arizona Mountaineering Club, a rock climbing club whose members spend every Thanksgiving and several other weekends at Joshua Tree. We have over 430 members in our club and have enjoyed the climbing experience in Joshua Tree many times. 53-A

I have read Alternative E as printed on your web site. I support this alternative over Alternatives A-D in the Backcountry and Wilderness Management Plan (or General Management Plan). I want to continue to enjoy the climbing experience at Joshua Tree for many years to come, and want the experience to be there for future generations, while protecting the quality of the experience at the same time. I hope that the Climbing Committee concept will work well, and look forward to its implementation.

I support the other recommendations in the plan, also, with particular attention to the hiking, camping, trail use and designation, and tortoise recover provisions.

Thank you,

Charlene J. Todd

Charlene Todd
Member, Arizona Mountaineering Club

53-A – Comments noted.

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