National Park Service
U.S. Department of the Interior

Pinnacles National Park General Management Plan & Environmental Assessment

Response to Substantive Comments
June 2013



Introduction

The planning team reviewed all comments submitted on the Draft Pinnacles National Park General Management Plan and Environmental Assessment (DGMP/EA). The following substantive comments were organized and analyzed by topic areas. The planning team grouped similar comments before providing the National Park Service response. A substantive comment is defined by NPS Director's Order 12 (DO-12, Section 4.6A) as one that does one or more of the following:

- questions, with reasonable basis, the accuracy of information in the environmental analysis
- questions, with reasonable basis, the adequacy of environmental analysis
- presents reasonable alternatives other than those presented in the environmental analysis
- causes changes or revisions in the proposal

Comments that contain substantive points regarding information in the DGMP/EA or comments that need clarification are extracted below. A concern statement has been developed to summarize the comments.

Alternatives

Alternative D, Preferred Alternative

Concern: Some elements of alternative B should be included in alternative D to advance biodiversity conservation goals.

Response: Alternative D includes the numerous restoration and other opportunities related to biodiversity conservation identified as common to all alternatives. In addition, alternative D would enhance educational opportunities, research, and restoration improving understanding of park resources and allowing the park to promote biodiversity goals and, a higher level of conservation in the long term.

Concern: Alternative B should be identified as the preferred alternative because it has fewer development impacts than alternative D.

Response: Although NEPA requires disclosure of the environmentally preferable alternative, there is no requirement to select that alternative. Selection of the preferred alternative identified similar beneficial effects from alternative B as well as additional enhanced beneficial effects from Alternative D. Although alternative B has smaller-scale development projects compared to alternative D, the replacement facilities and services that would be provided under alternative D would enhance educational opportunities, research, and restoration of resources at the park resulting in a better understanding of the park's resources without substantially increasing the park's development footprint.

Concern: The level of development in alternative D will impact the natural beauty of the area by including additional visitor centers, buildings, concessions and horse use.

Response: Development in alternative D is concentrated in existing areas of impact, such as the campground area and does not include public equestrian use. Instead of a new visitor center, alternative D would replace the east side visitor center and campground store. Similarly, a new concession office would replace the existing trailer. Minor new facilities, such as trails and picnic areas in alternative D would improve visitor access and opportunities.

Concern: Identify priority projects.

Response: Priority projects meet the mission of the NPS. The highest priority projects include deferred maintenance, natural and cultural resource protection, and providing visitor access and opportunities in the new lands.

Management Zones

Concern: On page 64 of the draft, applicable Management Zoning for alternative A is from the "Outdoor Recreation Review Commission." It is unclear how (or if) these zones relate to the "Management Zones" outlined on page 46 (and elsewhere).

Response: The previous zoning guidance by the "Outdoor Recreation Review Commission" would be superseded by the "Management Zones" described in this GMP.

Concern: Maps depicting the alternatives in both the Executive Summary and the GMP for alternatives B, C, and D show the road segment from the overflow parking to the Chaparral picnic area as an existing road. Commenter initially thought that no major changes were planned at Chaparral in terms of access.

Response: The action alternatives maps (alternatives B, C, and D) show the different management zones applied to different areas of the park. The management zones are applied in different ways based on the overall concept for each alternative. The management zone guidance on pages 45-55 identify the desired condition of resources and the types of visitor activities and facilities that would be allowed in each zone. The zoning maps show current facilities at the park. They do not depict potential future facilities. In response to this comment, the selected alternative zoning map has been updated to state "Locations of facilities shown were at the time the GMP was developed."

Environmental Consequences

Concern: The Draft GMP states on page 242 that "Large groups…climbing groups…sometimes adversely impact soundscapes on a short term basis." The Pinnacles landscape and climbing routes offer very few options for group climbing. Most climbing teams are pairs. They can be heard when partners are out of view and the wind comes up. Noise from kids and boom boxes can be more intrusive. Large groups of climbers should be counseled and directed to appropriate areas that won't disturb others.

Response: This section has been revised by deleting the phrase "Large groups, including" from the beginning of the sentence (see Errata).

Concern: Mitigation measures common to all actions identified in Chapter 5 should include an evaluation of Pinnacles for significant wildlife connectivity and potential refugia for species related to climate change. When planning projects, such as infrastructure and visitor use, Pinnacles should consider impacts to the areas most important to habitat connectivity and adaptation to climate change.

Response: As required by law and NPS policy, the park will consider direct, indirect, and cumulative impacts to areas most important to habitat connectivity in the face of climate change when planning projects. The park has begun to address evaluation of Pinnacles for these issues through climate change scenario planning. This ongoing planning process could include a vulnerability assessment and adaptation plan to best meet monument mission goals under climate change scenarios, as will be proposed by the park's Resource Stewardship Strategy (in progress).

Concern: Analysis of increased traffic, from activities such as camping on the west side, would further affect overused areas and should be included.

Response: The potential increased traffic related to the proposed west side walk-in campground (approximately 10 sites) would be negligible.

Visitor Experience

Visitor Experience, General

Concern: Proposals to disperse visitor use at choke points (trailheads and parking areas) should be expanded, by promoting self-guided hikes and interpretation, especially about cultural resources, at Bear Valley School, the east and west entrances, and at Chalone Creek.

Response: Use dispersal was one of the key objectives in the alternatives, including the preferred alternative. The alternatives describe proposals to open access into new areas and make more trail connections between currently accessible areas. Many of the ideas expressed in the comment will be possible under the new management zoning. Implementation level planning will also address visitor dispersion.

Concern: There has been an increase in the number of park staff but no increase in service to the public. The public has lost space with some former public areas converted to staff use or closed to the public.

Response: The preferred alternative provides for access to several new areas and additional public programming and visitor services, including enhanced visitor facilities.

Concern: Consider allowing paragliding and or hangliding from North Chalone or South Chalone Peak.

Response: New recreational activities would be considered in the context of appropriate use as defined by NPS Management Policies (2006): appropriate uses are key to the enjoyment of parks and the appreciation and inspiration derived from these resources. "An 'appropriate use' is a use that is suitable, proper, or fitting for a particular park, or to a particular location within a park. Not all uses are

appropriate or allowable in units of the national park system, and what is appropriate may vary from one park to another and from one location to another within a park."

Backcountry Camping

Concern: The park cannot accommodate camping while maintaining the current wilderness character and sense of solitude in the park backcountry. Backcountry camping could have adverse effects on sensitive park resources, including wilderness quality, and this activity would be difficult to manage because of limited staffing.

Response: As explained in the GMP, establishing backcountry camping at Pinnacles would be considered in the wilderness stewardship / backcountry management plan(s). The first step would be to identify potentially suitable locations. This suitability determination would be based on an analysis of how potential sites would affect resources and social values. Among the considerations would be distance from sources of noise and light pollution, percent slope, need for infrastructure, distance from water, distance from hiking trails, ability to locate sites outside of the viewshed of roads and trails and sensitive habitats, and ease of accessibility for law enforcement and maintenance.

If a wilderness location was selected, a Minimum Requirement Analysis would determine if, when, and how actions that might impact wilderness character could be implemented.

The plan(s) would also include an analysis of the feasibility of managing backcountry camping.

If these analyses result in a determination that backcountry camping is feasible and would not likely result in significant impacts to resources and social values, then a small number of backcountry campsites would be established on a trial basis. Upon establishment, backcountry campsites would be closely monitored to determine whether unacceptable impacts on resources or social values were occurring. Pending this evaluation, backcountry camping could continue after the trial period only if impacts were adequately mitigated.

Concern: Consider locating backcountry campsites away from heavily trafficked areas, such as along the North Wilderness Trail or north of it, or off the South Chalone Peak trail, rather than locating these sites in the High Peaks area.

Response: As noted in the previous response, there are a range of factors that would be considered in the selection of possible locations for backcountry campsites. Factors such as distance from trails, location outside of viewsheds of roads and trails, and grade of site to allow for level tent pads would likely preclude selection of sites in the steep terrain of the High Peaks.

Camping – General

Concern: Consider providing more car camping opportunities, walk-in camping on both sides of the park and at the Pinnacles Campground.

Response: The preferred alternative would broaden the range of available camping opportunities, including both walk-in car camping and backcountry camping. The large east side campground currently provides over 149 sites. Walk-in camping opportunities could also be provided in the vicinity of the

existing campground footprint. The preferred alternative includes a 10-site walk-in campground on the west side.

Concern: Because the campground swimming pool only serves some visitors and local residents, retaining it does not provide many benefits since the majority of visitors don't have access to the pool. The impact of removing the swimming pool would have fewer beneficial effects on the riparian area and more beneficial effects for a small number of visitors. The EA should also mention use by local residents.

Response: Although day hikers occasionally cool off in park streams, campers are more likely to use streams to cool off because they may go hiking and then return to the campground for a few hours or may stay in the campground all day. As a result, campers are more likely to affect nearby creeks. Sandy Creek flows year round through the campground. Noticeable degradation of its banks from trampling is evident. Without the campground swimming pool, use of Sandy Creek would likely be much more extensive. Because this use affects prime endangered species habitat (for the California Red-legged frog) it is important to minimize these impacts as much as possible. Retaining the swimming pool will continue to provide some degree of beneficial effects by allowing another location for visitors to recreate that does not affect an endangered species. In comparison to use by campground occupants, use of the pool by locals is very slight.

Camping – West Side

Concern: Among the locations that should be considered for a new west side campground, include Jawbone Canyon, near overflow parking, near the North Wilderness Trail and current picnic area, and Double Gates (located between the west entrance and the overflow parking area).

Response: These locations will be considered in future planning.

Concern: There should be drive-in camping on the west side for those not physically able to access the proposed walk-in campground.

Response: Depending on the design and location of the walk-in sites, there could be accessible (drive-in) sites provided. This will be considered in future planning for the campground.

Concern: No fires should be allowed at the proposed walk-in campground. Wood smoke is hazardous and affects local air quality.

Response: General impacts to air quality from campfire smoke were addressed in the GMP. Analysis of site-specific impacts related to the proposed west side walk-in campground will be addressed in the planning process for the development of the campground.

Concern: More camping should be provided on the west side.

Response: Future implementation planning for the west side campground could consider the potential for expansion in the future.

Climbing

Concern: On page 143, the GMP identifies "Use of brown or gray webbing for anchors..." The current universal standard is commercially available stainless steel bolts and hardware - which are durable, long lasting and have the lowest visual impact.

Response: This section has been revised to replace “Use of brown or gray webbing” with “Use of low visibility materials” (see Errata).

Concern: A ban on rappel bolting should be implemented to promote higher quality climbing routes and to minimize resource damage because rappel bolting is easier to do and increases the development of new routes.

Response: Determining whether to ban rappel bolting will be considered in the climbing management plan. (Note: Because power drills are not allowed in designated wilderness, this may also effectively limit the effect of rappel bolting.)

Concern: Old, weak anchors should be replaced with modern anchors to enhance visitor safety. Consider permitting power drills to replace aging and dangerous fixed anchors.

Response: This will be considered in the climbing management plan.

Concern: Develop a plan to ensure that Pinnacles’ designated climbing routes minimize impacts on visitors, including climber safety, and wildlife while discouraging climbing in sensitive areas.

Response: This will be considered in the climbing management plan.

Concern: In addition to following the guidance in NPS Director’s Order #41: Wilderness Stewardship, the park should consult with Rocky Mountain, Zion, and Yosemite National Parks in developing the Climbing Management Plan. These parks have plans which successfully balance climbing access, including fixed anchors, while preserving wilderness characteristics.

Response: This will be considered in the climbing management plan.

Concern: The plan should show climbing as a traditional use of the park.

Response: Climbing is recognized an ongoing use on p. 143. The common-to-all-alternatives actions state that climbing use will continue (p. 56).

Trails

Concern: The new visitor center near the Soledad entrance should be linked to other areas of the park via a trail.

Response: This trail is part of the preferred alternative.

Equestrian

Concern: Equestrian use should be part of the preferred alternative.

Response: The park did not include equestrian use in the preferred alternative for several reasons, including feasibility and cost. Equestrian use would have required new staging facilities, as well as an additional level of trail maintenance, facility upkeep, and administrative tasks. Because other public lands in the region currently provide these opportunities, the park determined the addition of this activity to a small area within the park was not worth the costs.

Interpretation / Education

Concern: Pinnacles should get more involved with local schools and curriculum development.

Response: The park would like to conduct more programs at local schools in rural San Benito County and for the southern Salinas Valley schools. The park is also working to improve communication to increase awareness of the opportunity for ranger visits in winter for area schools.

Concern: Consider re-establishing the Artist-in-Residence program, while expanding it to include living history crafts demonstrations.

Response: The Artist in Residence program at Pinnacles has been dormant for several years due to lack of funding. It is the park's intent to revive the program with a focus on local community members being able to share their ranching/homesteading domestic traditional arts. This removes the need for providing housing and transportation. The park also intends to work with park partners to raise funding to re-establish a more traditional Artist in Residence Program.

Facilities and Access Chapter

East Side Visitor Center / Entrance Station

Concern: The location of the visitor center before the fee booth is confusing. The park should relocate the fee booth.

Response: The preferred alternative includes moving the fee booth (entrance station) to a location before the visitor center. Replacement facilities would be designed and located in a coordinated manner. The park would work with California Department of Transportation in relocating the entrance station.

Administrative Facilities

Concern: Bear Gulch, where park administrative facilities are located, is prone to fire and floods. The buildings are also in need of rehabilitation to minimize existing hazards, such as from rodents. New modern administrative facilities should be constructed in defensible space near the campground.

Response: The GMP provides for relocating administrative facilities away from Bear Gulch to a location near the campground. This could include the possibility of relocating administrative facilities outside the park. Regardless, the existing historic buildings would be retained because they contribute to the Pinnacles East Entrance Historic District.

Recent (c. 2009) condition assessments identified the buildings as being in "good" condition. Non-historic structures, such as the resource management office trailer are proposed for removal, with their functions relocated.

Moses Spring Parking Lot

Concern: Removing facilities, such as the Moses Spring parking lot will reduce the ability of the park to accommodate potential increased visitation associated with the new national park designation.

Response: The preferred alternative includes developing a site plan for the Moses Spring picnic and parking area to improve the natural hydrologic conditions and habitat functions. This implementation planning process will determine whether it is necessary to alter or partially or wholly remove the parking area.

West Side Facilities

Concern: Although West side facilities were only partially destroyed by flooding, the floodplain is being used to recommend the removal of all West Side campsites, including those not affected.

Response: Retaining camping in a floodplain is a safety hazard and does not meet NPS policy. No camping currently exists on the West Side, as it was removed following flooding in 1995. Re-establishing a walk-in campground outside of the floodplain on the west side is included in the preferred alternative. Other facilities at Chaparral have also been relocated out of the floodplain.

Chaparral Parking Lot

Concern: The park should retain the Chaparral parking lot because it provides several benefits for visitors, including impressive views, shade, and easy trail access.

Response: Because Chaparral facilities, including the parking area are within the High Peaks viewshed, relocating these was identified as a priority in the 1976 Master Plan and West Side Development Concept Plan. In addition to the viewshed concerns, the parking area impedes natural drainage patterns. As a result, this action was retained in the GMP.

Concern: The Chaparral parking lot should be retained because it is flat and accessible to visitors with disabilities.

Response: Effective site planning can provide a level area for a new parking area outside of the floodplain (see also responses to previous comments). The existing overflow parking could also potentially be redesigned to provide additional parking. Accessible parking and access would be a required part of this redesign.

Concern: Consider retaining the Chaparral parking lot because it serves as a staging area with access to both sides of the park during a rescue.

Response: The overflow parking area will also provide a viable replacement emergency staging area.

Concern: National park designation will result in increased west side visitation. The GMP should address impacts related to the expectation for increased visitation on the west side (because it is closest to U.S. Highway 101).

Response: This issue will be addressed in implementation planning for west side visitor facilities, including for relocating parking and adding walk-in camping facilities.

Concern: Chaparral parking should be retained because flooding is rare.

Response: There have been more than six documented cases of flooding on the west side in the vicinity of the parking area. These floods have caused thousands of dollars in facility damage. Camping was discontinued in 1995 after flooding washed away several camp sites. In 1998, 20 of the 90 parking spaces at the Chaparral parking area were lost when the creek channel relocated through a portion the parking area. That same year, footbridges connecting the parking lot to the Juniper Canyon trail were also destroyed.

Concern: Rather than removing the entire Chaparral parking lot, analyze the benefits of the following changes to the Chaparral floodplain area:

- Remove and restore the walk-in picnic area only.
- Move restroom out of the floodplain.
- Investigate ways to channel/filter the water runoff from the parking lot.
- Remove row of parking closest to river, reducing the size and allow riparian restoration to filter water.

Response: Future implementation planning will consider a range of options including these ideas. Addressing resource concerns while providing visitor opportunities is a key goal for the planning process. As noted in the GMP, the overflow parking lot will be retained and could be expanded.

Concern: Why is the NPS proposing to remove development, such as the Chaparral parking area, within the floodplain on the west side while facilities on the east side, such as administrative buildings in Bear Gulch and a portion of the Pinnacles Campground, are being retained within the floodplain?

Response: The GMP provides for later relocation of facilities at Bear Gulch if affected by flooding (or fire) and for eliminating campsites in the floodplain within the Pinnacles Campground through reconfiguration. As stated earlier, the existing historic buildings at Bear Gulch would be retained because they contribute to the Pinnacles East Entrance Historic District.

Shuttle

Concern: To accommodate peak use, the park needs a robust and well-advertised shuttle system, with improved signage at stops and a posted schedule.

Response: The preferred alternative provides for enhancing the existing shuttle system with additional amenities. The NPS will seek funding to improve shuttle staging areas as well as to increase operations that provide for more connections between trailheads.

Concern: Consider a shuttle from Hollister to the park. It could be staffed with a ranger or volunteers to prepare visitors for their park experience.

Response: If a shuttle service was provided by an outside entity from Hollister to the park, the park could potentially allow a ranger or volunteer to provide information to visitors. There is already a very successful model for such a program on a larger scale with rangers and highly trained volunteers riding on Amtrak trains and informing the public about the history of the western United States. Pinnacles could also explore the opportunity to provide this service on a smaller day trip scale.

Access / Accessibility

Concern: Connecting the east and west sides of the park should be considered to improve public access, safety, and firefighting.

Response: The center of the park between Highway 146 on the east side and west side is designated wilderness. In 1976, congress designated 12,952 acres of federally protected wilderness within Pinnacles National Park. At the time, this wilderness included 80% of the Pinnacles National Monument. The only areas excluded from wilderness designation were then existing road corridors. Because the Wilderness Act specifically prohibits permanent and temporary roads, as well as motor vehicles, and mechanical transport unless it is "necessary to meet minimum requirements for the administration of the area for the purpose of this Act," the park cannot provide bicycle or motor vehicle use in the park interior. Connecting the east and west sides of the park has arisen repeatedly through various planning processes and has continued to be considered but dismissed (see also "Alternatives Considered but Dismissed from Detailed Consideration" section in the GMP).

Wilderness

Concern: The 2,715 acres proposed for addition to the Pinnacles Wilderness should be managed as wilderness.

Response: This area is zoned as either primitive or semi-primitive in the GMP selected alternative. These zones are compatible with wilderness because they would preclude development.

Concern: The preferred alternative would degrade the wilderness experience because actions to manage backcountry camping would require roads or other actions that would reduce remoteness and solitude for backcountry travelers and disturb wildlife.

Response: There would be minimal management actions associated with managing backcountry camping. No administrative roads are proposed for managing potential backcountry campsites. NPS staff would hike into backcountry campsites to manage these.

Natural Resources

Concern: The GMP/EA should be revised to include a plan to reduce the number of pigs within the park. The goal should be to eliminate all pigs from the park to help protect resources.

Response: Managing the nonnative pig population was identified in the GMP as common to all alternatives. Eliminating this nonnative species continues to be a high priority for the park.

Concern: Efforts to preserve the portion of the Pinnacles Volcanics near Los Angeles should occur.

Response: Although the Neenach Volcanics lie near the present day town of Lancaster, California, outcrops of this formation are currently located on private land.

Cultural Resources

General

Concern: The emphasis in Alternative D should be on the natural resources, which are unique, dramatic, precious, and very fragile, rather than on cultural resources.

Response: While natural resources at Pinnacles are abundant and significant, recent national park designation also recognizes the significance of cultural resources at Pinnacles.

Concern: Place signage throughout the park to inform visitors that cultural resources found should not to be removed, but rather reported to the park.

Response: The park currently provides educational / interpretive signs that encourage respect for cultural resources and discourage collecting or moving artifacts. Because the preferred alternative increases both the cultural resource and interpretation/education staff, additional information will likely be provided, such as how the Amah Mutsun define cultural resources (to include all plant life, animal life, fish life, bird life, waterways, springs, caves, mountain tops, bird flight paths, as well as artifacts that were made by their ancestors).

Concern: Please describe how resource monitoring is related to providing access to McCabe Canyon.

Response: The park will regularly monitor visitor use impacts on natural and cultural resources, including in McCabe Canyon. Thresholds for management action will be established. User capacity monitoring protocol will also address the number of observed disturbances to cultural sites.

Concern: Expanded cultural resources interpretation should emphasize the full significance of the cultural resource. For example, interpreters often tell visitors that grasses and plants were used by Native people to make baskets, but do not identify the spiritual importance of the basket and the spiritual offering/purpose of the plant. The Amah Mutsun recommend that a more concerted training program related to the Native people, who occupied the Park for over 10,000 years, be developed.

Response: The selected alternative calls for increasing cultural resources interpretation and this could be integrated into that expansion.

North Chalone Peak Fire Lookout

Concern: The North Chalone Peak Fire Lookout should be preserved and adaptively reused for administrative purposes and/or visitor interpretation and education in the preferred alternative (as in Alternative C). Adaptive reuse could include use as a solar-powered camping destination.

Response: The preferred alternative allows for preservation and adaptive reuse of the North Chalone Peak Fire Lookout if funding for its rehabilitation can be secured within approximately five years. The NPS would also be willing work with historical preservation organizations to preserve this structure.

Concern: Consider updating the following statement in the Draft GMP: "When removal [of the fire lookout], as a preliminary alternative, was presented to the public, the concept did not generate controversy." There was public interest during the Draft GMP public meetings in finding ways to avoid removal of the Fire Lookout.

Response: During the review of the preliminary alternatives, removal of the fire lookout was included in the range of alternatives. This idea did not generate controversy. Removal of the fire lookout is included in alternative B and is also an option in the preferred alternative if funding and partner assistance is not found. During review of the Draft GMP, a few members of the public expressed interest in working with the park to preserve the fire lookout. This is in line with the preferred alternative. There has not been any controversy; rather, the GMP has generated positive interest that could help the park move forward to rehabilitate the fire lookout.

Concern: The GMP should describe the significance of the fire lookout which has an association with the other historic CCC structures in the park as well as an artifact deposit related to the fire lookout.

Response: There are other fire lookout towers in California. These are described in "Historical Significance Evaluation of the California Department of Forestry and Fire Protection" report to the California Department of Forestry in 1991 and "Management Plan for CDF's Historic Buildings and Archaeological Sites by D.G. Foster and M.V. Thorton in 2001 (CDF Archaeological Reports Number 22).

Bear Valley School

Concern: Describe how the Bear Valley School will be used and identify the timeline for rehabilitation.

Response: As described in the draft GMP, the Bear Valley School will be rehabilitated for adaptive reuse. It is also intended to be available for community use. Actions to understand the significance of the building have begun (research and documentation). A Historic Structures Report (HSR) to provide an

analysis of its current condition, a history of its past use, maintenance and construction details is currently being researched, and a prescription for stabilization that retains the building's integrity is being written by an NPS historical architect. The HSR will be completed by the end of 2013. Later this year a National Register nomination will be prepared.

Native American Resources and Collaboration

Concern: The draft GMP should include more definitive language regarding the relationship between the Amah Mutsun and the NPS.

Response: This section has been revised to state: "Ongoing collaboration between the NPS and the Amah Mutsun and other tribes will continue to be important in managing McCabe Canyon."

Commercial Services

Concern: Alternative D (and alternative C) should include the additional commercial activities consistent with the GMP and national policies referred to in Alternatives B instead of only the "commercial interpretive tours."

Response: This section in the draft GMP has been modified to include "and other commercial activities" after "commercial interpretive tours" because the intent was to describe commercial interpretive tours as additive to the "other commercial activities" described in alternative B.

Concern: Because certified or accredited guides receive a wide variety of key training, such as Leave No Trace, ™ strong consideration should be given to Commercial Use Authorization (CUA) applicants who are AMGA certified guides or accredited programs, or that certification and / or accreditation be made a prerequisite for rock climbing CUAs. This would ensure the highest standard of resource protection and safe climbing practices, as well as public education about the cultural sensitivities and the unique ecosystem of the park.

Response: The park may require that guides possess additional certifications and training beyond what is required by law, regulations or NPS policy as special conditions to providing the visitor services specified under the commercial use authorization. Requirements beyond what is required by law, regulations or NPS policy are at the discretion of the superintendent and may change over time.

Concern: Climbing gear rentals would be a liability to NPS and concessioner and increase the physical and financial burden on SAR resources - due to inexperienced/first-time climbers.

Response: The campground concessioner is authorized to sell climbing gear. The concessioner currently does not rent climbing gear. Having to buy gear may deter inexperienced/first-time climbers.

Partnerships / Outreach

Concern: The NPS should partner with the Hollister Arts Council, Monterey Aquarium, and Soledad Health Care District, among other organizations.

Response: As noted in the draft GMP, the park would establish partnerships with various agencies and organizations that support park goals regarding outreach and resource preservation.

Operations

Concern: The park should ban the sale of single use plastic water bottles. Many NPS administered sites have implemented this and have used interpretive displays to foster an awareness of the impact of single use plastic water bottles. Shuttle stops with water filling stations identified in the plan would also support this.

Response: The park is in the process of working with its concessioner and cooperating association on this issue.

Staffing

Concern: Staffing needs at the park should be reviewed.

Response: As described in the draft GMP, the park and planning team identified staffing necessary to carry out the goals of the plan. In addition, current staffing shortfalls are also included in the overall proposed staffing discussion.

Boundaries

Concern: Rock Springs Ranch should be added to the park to protect nationally significant resources. Acquisition should be from a willing seller only. If purchase of this significant area cannot occur, the park should collaborate with the managers and owners of Rock Springs Ranch to achieve ecological conservation goals that benefit Pinnacles that support the existing uses of the Ranch.

Response: The National Park Service considered the addition of Rocks Springs Ranch in the GMP, but determined that addition of Rocks Springs Ranch does not appear to be economically feasible. The GMP includes guidance for working cooperatively with surrounding neighbors, including the managers and owners of Rock Springs Ranch to protect regional resources.

National Park Status

Concern: The GMP should address the potential for national park status to result in increased visitation, adverse impacts on resources, and access.

Response: Potential changes associated with the change in national park unit designation from a national monument to a national park are outside the scope of the GMP; however, the proposals in the preferred alternative require implementation planning and the potential for increased visitation, impacts and other changes associated with this new status will be taken into consideration as these are developed.