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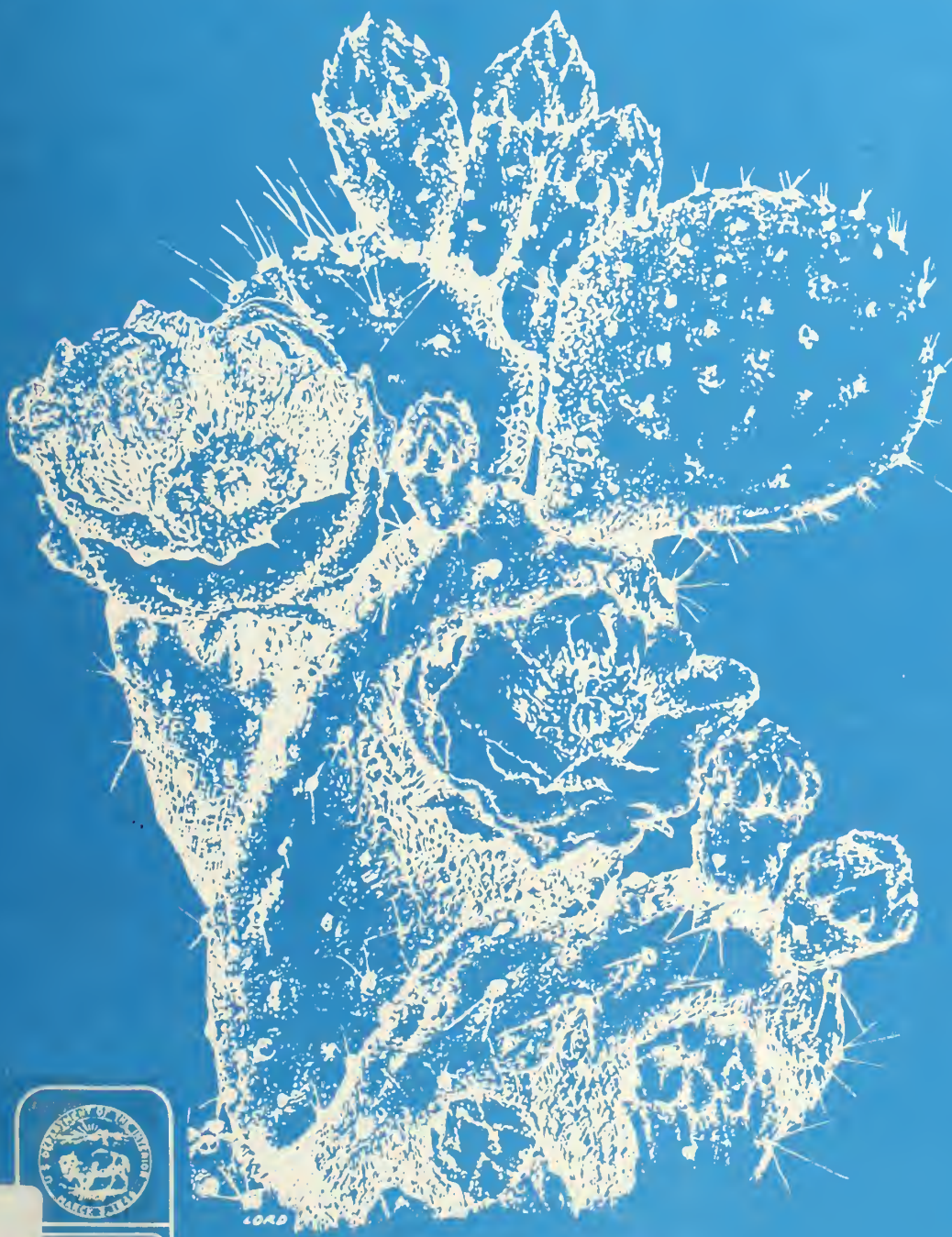


88019000

1988

PLAN AMENDMENTS

TO THE CALIFORNIA DESERT CONSERVATION AREA
PLAN OF 1980



Decision
Record



December 1989

California
Desert District

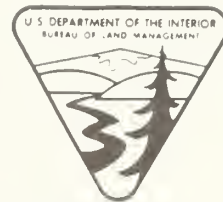
Bureau of Land Management
U.S. Department of the Interior

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United States Department of the Interior

BUREAU OF LAND MANAGEMENT
CALIFORNIA DESERT DISTRICT OFFICE
1695 SPRUCE STREET
RIVERSIDE, CALIFORNIA 92507-2497



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Memorandum

To: State Director (CA-910)
From: District Manager, California Desert
Subject: 1988 Amendment Decision

Enclosed is the Record of Decision for the 1988 amendment review of the California Desert Plan indicating my approval of the amendments.

The enclosed document is provided for your review and concurrence.

Enclosure

I concur with the California Desert District Manager's amendment decision.

E. J. Handley
State Director, California

1/11/90
Date



RECORD OF DECISION

The 1988 amendment review of the California Desert Conservation Area Plan was conducted in accordance with Bureau of Land Management Planning Regulations (43 CFR 1610.5-5), with the procedures set forth in Chapter 7 of the CDCA Plan (1980), and with the Council on Environmental Quality regulations for implementing the National Environmental Policy Act (40 CFR 1500).

Proposals for amendments were accepted during a 47-day period from January 28 to March 18, 1988. The thirty-three amendments proposed by the public and by the BLM staff were screened by BLM management and by the California Desert District Advisory Council according to the following criteria:

1. Is the proposed amendment based upon new data not considered when the plan was developed?
2. Does the information represent a change in legal or regulatory mandate?
3. Is the supporting detail sufficient and the problem clearly stated so that the request can be considered?
4. Does the information represent a formal change in State or local government or agency plans?

A public scoping meeting was held on April 9, 1988 in El Centro, and nineteen proposals were accepted for consideration in the environmental assessment (EA). Of the remaining fourteen proposals, seven were rejected from consideration or will be handled by methods more appropriate than the amendment procedure, as described in Appendix B of the EA. Consideration of seven proposals was deferred until a later date.

The public comment period on the EA extended from June 8 to August 21, 1989. Thirty-two written comments were received. Oral comments were accepted at the June 16, 1989 meeting of the Advisory Council in San Bernardino.

The preferred alternative for Amendment Two has been changed from that recommended in the EA. This amendment, which proposed an ACEC for the area adjacent to Red Rock Canyon, was rejected on the grounds that designation of an ACERC would not add to the area's current management and protection. This includes management agreements in which the BLM, the California Department of Parks and Recreation, the Audubon Society, and the Gear Grinders 4-WD Club take part.

Amendment 20, a change in range classification of the Pilot Knob grazing allotment, was brought back from deferred status into the 1988 amendment cycle. This amendment was introduced in the

1983 Plan Amendment cycle but was deferred due to insufficient resource and management information. It was to be reconsidered after the allotment management plan and environmental assessment were completed.

The preferred alternatives for all other amendments are the same as those described in the environmental assessment.

Each amendment is described below. All letters received from the public and responses to specific comments are given in the Comments and Response section of this Record of Decision.

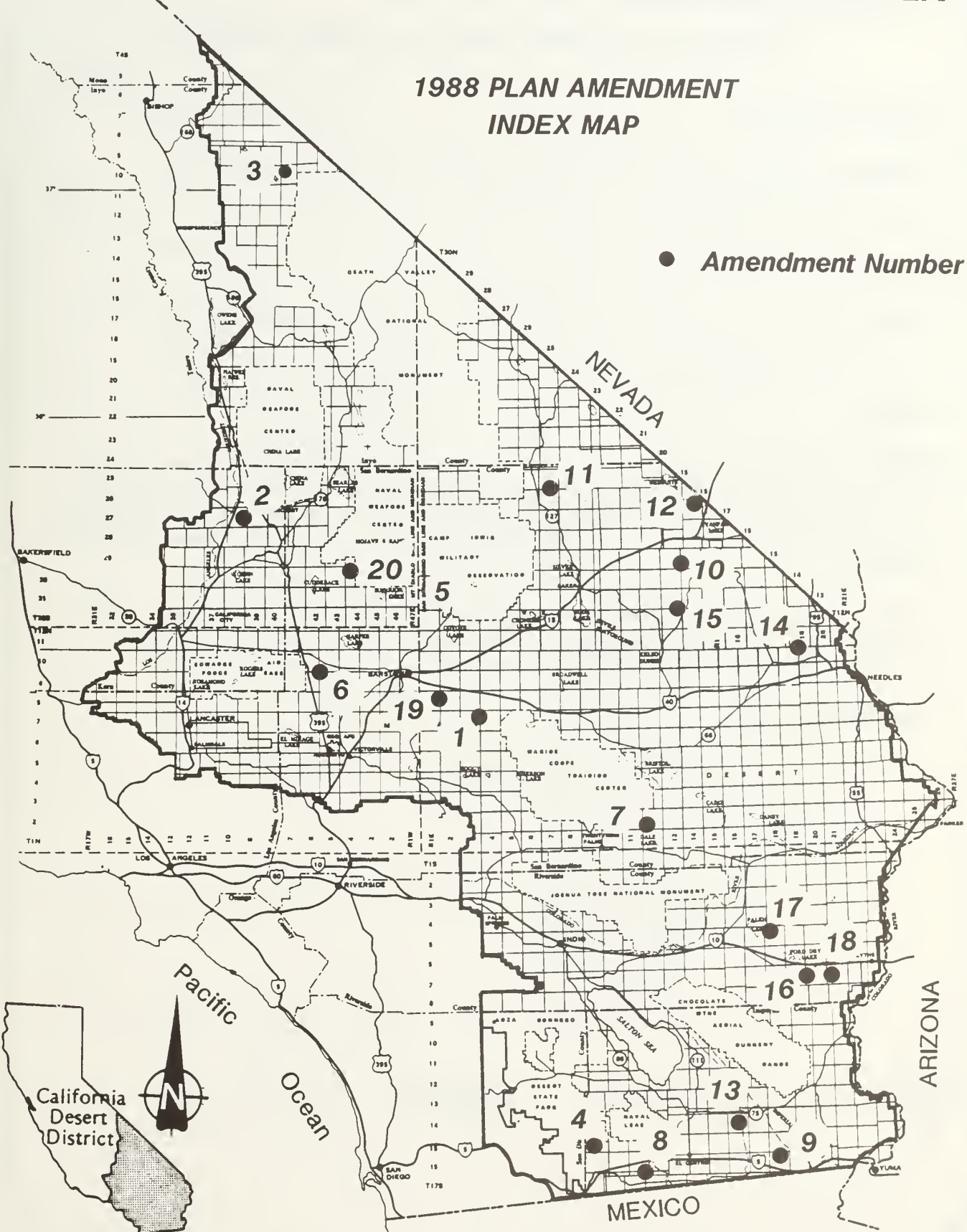
Finding of No Significant Impact

The environmental assessment identified no significant effects on the human or the natural environment. Therefore, an environmental impact statement is not required.

CALIFORNIA DESERT CONSERVATION AREA

1988 PLAN AMENDMENT INDEX MAP

● Amendment Number



AMENDMENT ONE

NEW ACEC AT RODMAN MOUNTAINS CULTURAL AREA

Proposed Amendment

Designate an ACEC for cultural resources at the Rodman Mountain Cultural Area.

Other Alternatives Considered

No Action

Decision

Accept Proposed Amendment.

Rationale

Rock art sites within this area have been listed on the National Register of Historic Places. These sites are significant because: they show a diversity of artistic styles and are associated with habitation sites, trails, and resource exploitation sites; they are conveniently located for public interpretation; and they are significant to the religious and spiritual concerns of Native Americans.

ACEC status will provide the mechanism to give this unique area the special management it needs. Since the ACEC area lies within a recommended wilderness study area, further protection will be provided if Congress designates this area as wilderness.

Implementation Needs



None

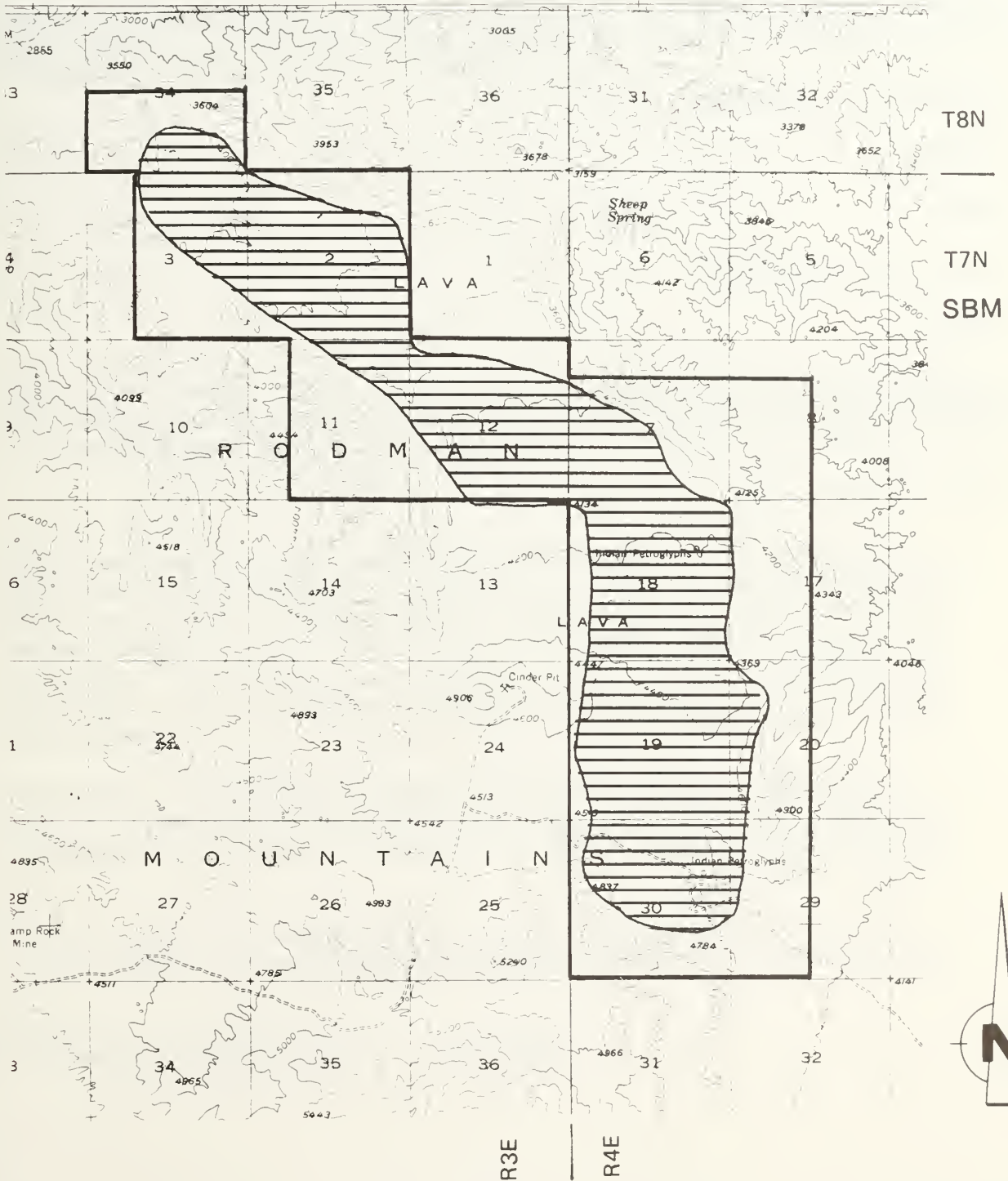

District Manager


Date

AMENDMENT 1

New ACEC RODMAN MOUNTAINS

-  PROPOSED ACEC
-  RODMAN MOUNTAIN CULTURAL AREA



AMENDMENT TWO

NEW ACEC ADJACENT TO RED ROCK CANYON STATE PARK

Proposed Amendment

Designate an ACEC for wildlife and botanical resources adjacent to Red Rock Canyon State Park in the land co-managed by the BLM and the California State Department of Parks and Recreation.

Other Alternatives Considered

No Action

Decision

Reject Proposed Amendment

Rationale

The area is already adequately protected by a number of management processes. Adding a new designation would not improve on the area's current management and protection. Further, though the area is adjacent to a State Park, its resources, in total, do not merit ACEC designation.

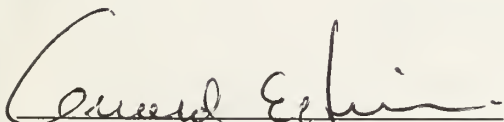
Current management includes the following:

1. A Memorandum of Understanding (MOU) between the BLM and the California Department of Parks and Recreation. The area of the proposed ACEC is managed by State Parks as part of Red Rock Canyon State Park, except that BLM manages mining and grazing. The Scenic Cliffs/Nightmare Gulch portion of the area is closed to vehicles from February 1 to July 1 to protect sensitive resources. From July 1 to January 31, vehicle use is allowed between the 16th day and the end of each month. Vehicle access is restricted to three designated routes. State Parks monitors and reports results to BLM.
2. A Cooperative Management Agreement (CMA) between State Parks, BLM and the Audubon Society. The Audubon Society monitors the Scenic Cliffs/Nightmare Gulch area and provides an annual report to State Parks and BLM, discussing the trend and conditions of sensitive resources.
3. A CMA between State Parks, BLM, and the Gear Grinders 4-WD Club. The Gear Grinders maintain the designated vehicle routes and keep them open for 4-WD use.

Better coordination of these three management efforts is needed. We will hold at least one annual meeting of the four parties to discuss the results of monitoring, new issues, and individual concerns. Current management should be evaluated and any needed changes should be implemented.

Implementation Needs

Annual meeting of BLM, State Parks, Audubon, and Gear Grinders.

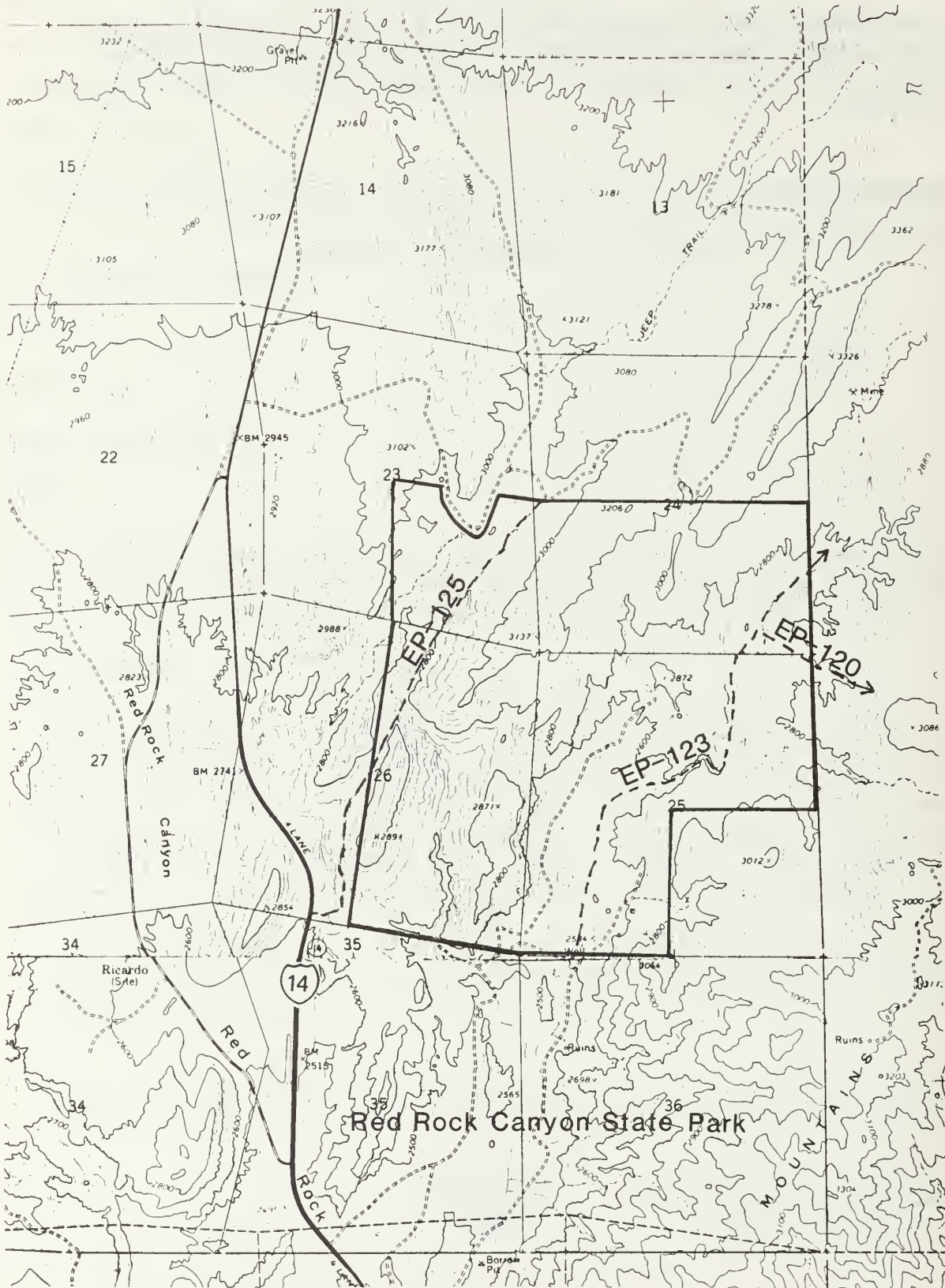

District Manager


Date

AMENDMENT 2

**New ACEC
Red Rock Canyon**

 **PROPOSED ACEC BOUNDARY**



T29S
T30S
MDM

R37E
R38E

AMENDMENT THREE

NEW ACEC AT DEDECKERA CANYON

Proposed Amendment

Designate an ACEC at Dedeckera Canyon and the adjoining area for botanical and other significant resources.

Other Alternatives Considered

No Action

Decision

Accept Proposed Amendment

Rationale

This canyon is an area of unusual values. Its dolomite cliffs provide habitat for unique plant assemblages, including Dedeckera eurekaensis and many species endemic to the Death Valley region. Its archaeological sites have yet to receive adequate study, but there is evidence that they should be protected from degradation. Raptors are present and, possibly, bighorn sheep.

A 4WD route runs through the canyon between Eureka and Saline Valleys. Camping in the canyon could be hazardous to both the natural resources and to the campers, as flash floods sometimes sweep down the canyon with great force. ACEC management could protect the botanical and archaeological resources and control human use of the canyon.

Implementation Needs

None.




District Manager



Date

AMENDMENT 3

New ACEC DEDECKERA CANYON

 PROPOSED ACEC BOUNDARY

R39E
R40E

Route F-1794

EUREKA
VALLEY

EUREKA DUNES
+ ACEC

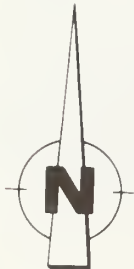
SAND
DUNES

Dedeckera
Canyon

T10S

T101/2S

T11S
MDM



AMENDMENT FOUR

EXPAND BOUNDARIES OF COYOTE MOUNTAINS ACEC (#62).

Proposed Amendment

Expand boundaries of Coyote Mountains ACEC (#62)

Other Alternatives Considered

No Action

Decision

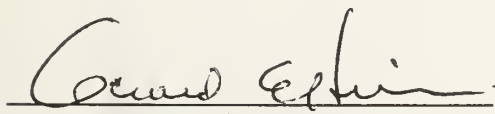
Accept Proposed Amendment

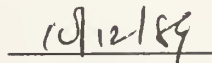
Rationale

The original boundaries of this ACEC included only a few paleontological areas in the Coyote Mountains. New research by the San Diego Natural History Museum, under cooperative agreement with the Bureau, has better defined the wider distribution of paleontological resources.

Implementation Needs

None

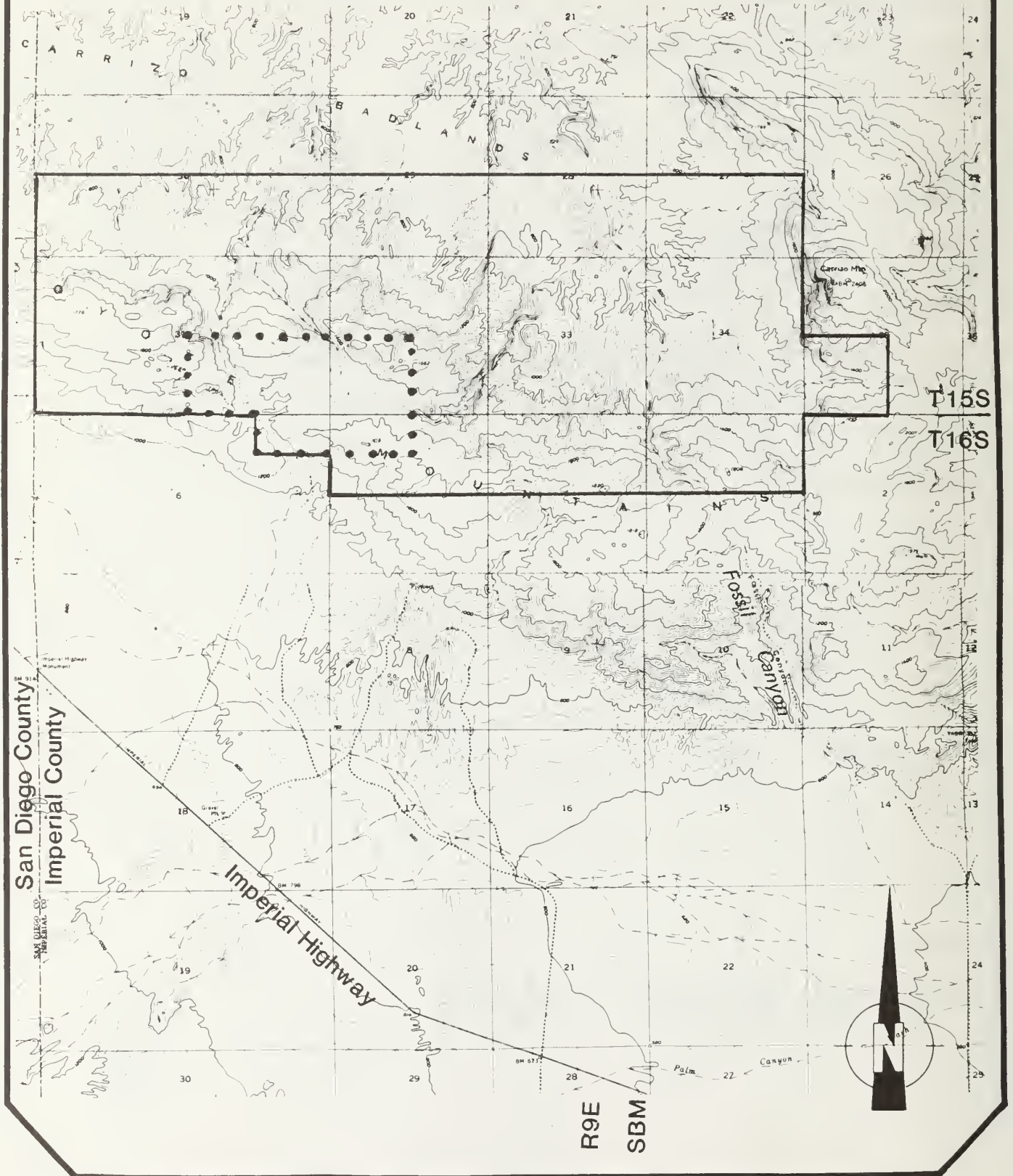

District Manager


Date

AMENDMENT 4

**ACEC 62
COYOTE MOUNTAINS
FOSSIL SITE**

..... ORIGINAL BOUNDARY
—— NEW ACEC BOUNDARY



AMENDMENT FIVE

DELETE CAMP IRWIN BOUNDARY ACEC (#28)

Proposed Amendment

Delete Camp Irwin Boundary ACEC (#28).

Other Alternatives Considered

No Action

Decision

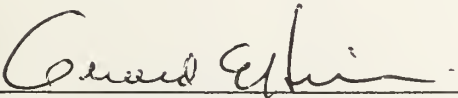
Accept Proposed Amendment

Rationale

Approximately 80% of the ACEC and 100% of the cultural resources are located within the Fort Irwin National Training Center, which is administered by the Department of the Army. The cultural resources on public lands under BLM administration do not warrant the special management provided by an ACEC designation.

Implementation Needs

None


District Manager


Date

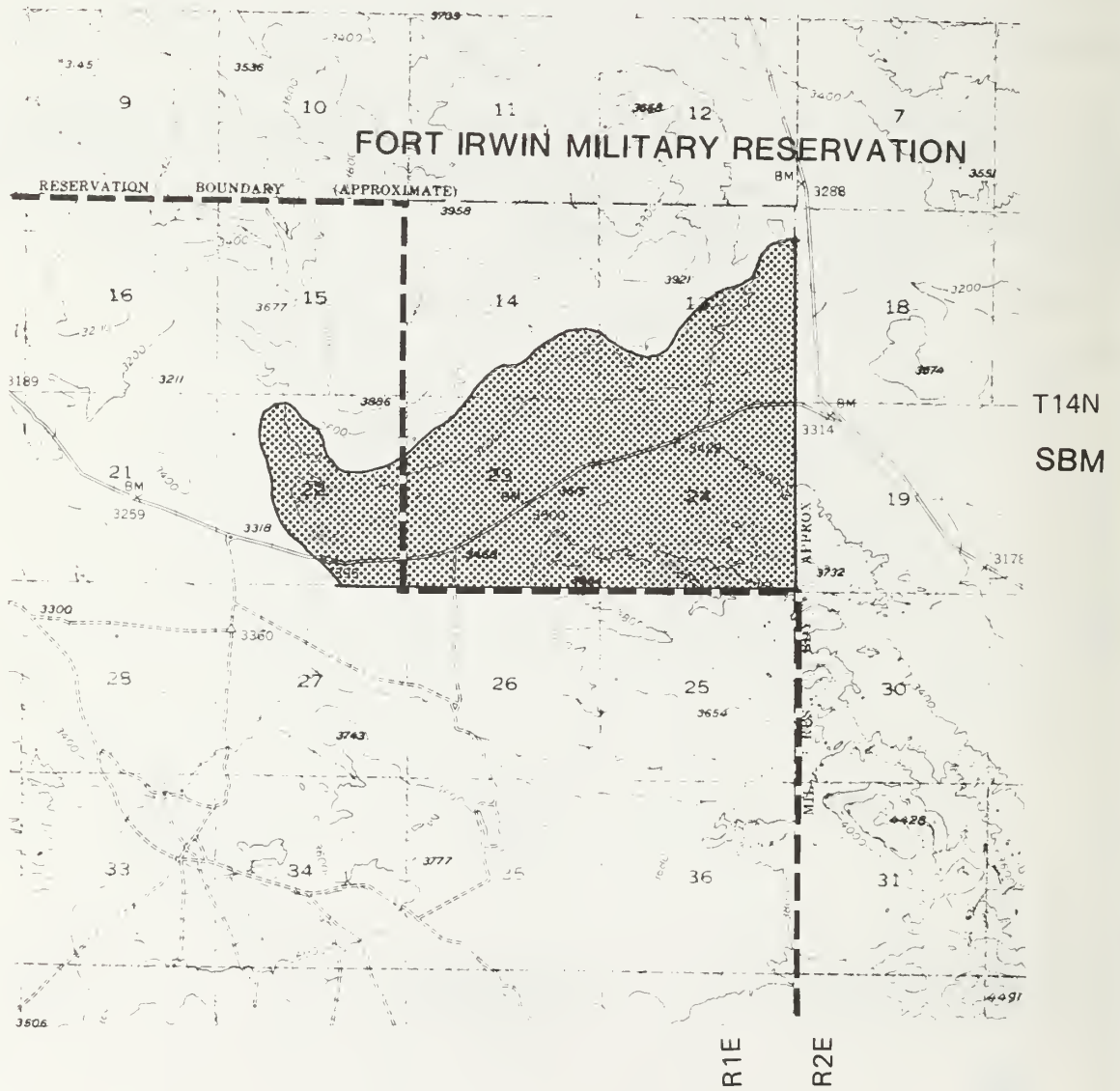
AMENDMENT 5

Delete ACEC 28

CAMP IRWIN MILITARY BOUNDARY



ACEC 28



AMENDMENT SIX

DELETE KRAMER HILLS ACEC (#38)

Proposed Amendment

Delete Kramer Hills ACEC (#38).

Other Alternatives Considered

No Action

Decision

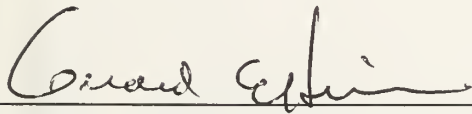
Accept Proposed Amendment

Rationale

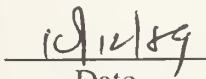
A 100% pedestrian survey of the ACEC in 1984 and again in 1986 failed to locate any cultural resources within the ACEC. The resources present in this area do not warrant the special management implied by an ACEC designation.

Implementation Needs

None



District Manager

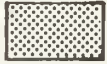


Date

AMENDMENT 6

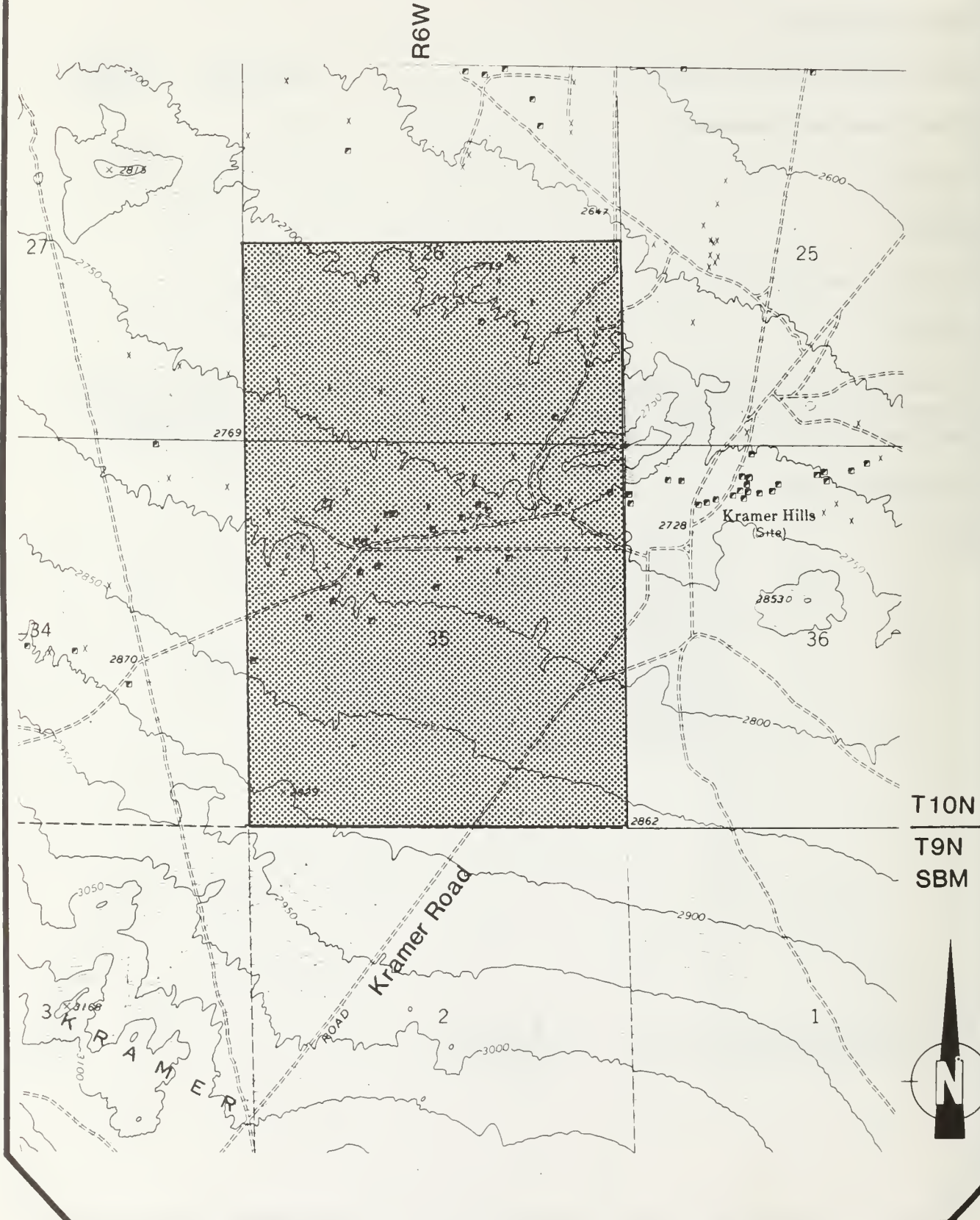
Delete ACEC 38

KRAMER HILLS



ACEC 38

R6W



T10N

T9N

SBM



AMENDMENT SEVEN
DELETE DALE LAKE ACEC (#57)

Proposed Amendment

Delete Dale Lake ACEC (#57)

Other Alternatives Considered

No Action

Decision

Accept Proposed Amendment

Rationale

A 100% pedestrian survey of the ACEC in January 1987 failed to locate significant cultural resources within the ACEC; previously recorded sites could not be relocated. The resources present in this area do not warrant the special management implied by an ACEC designation.

Implementation Needs


None

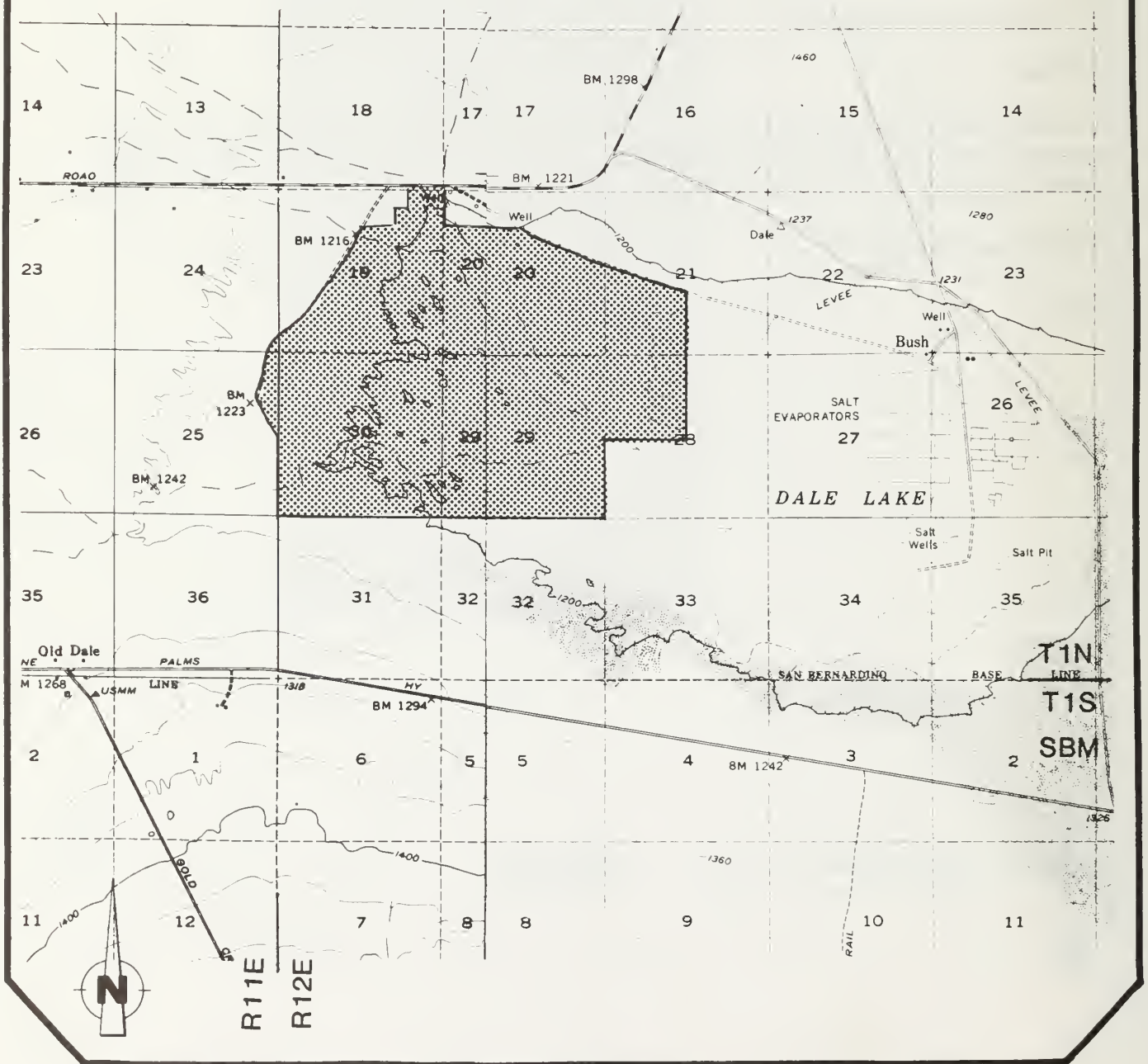

District Manager


Date

AMENDMENT 7

Delete ACEC 51
DALE LAKE

 ACEC 51



AMENDMENT EIGHT

CHANGE CLASS "M" TO CLASS "L" IN YUHA DESERT MANAGEMENT AREA

Proposed Amendment

Change the Multiple-Use Class (MUC) from "M" to "L" in the portion of the Yuha Desert Management Area between Highways 80 and 98 (excluding the Dunaway Staging Area).

Other Alternatives Considered

No Action

Decision

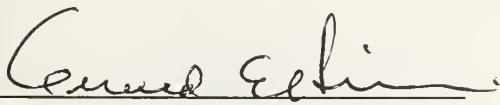
Accept Proposed Amendment

Rationale

Wildlife and cultural resource values in the Yuha Desert have deteriorated steadily since the late 1970s, in spite of many attempts to achieve management control. These included the formulation and implementation of the Yuha Desert Management Framework Plan (1975), the Yuha Basin ACEC Activity Plan (1981), the Yuha Desert Wildlife Habitat Management Plan (1983), and the Yuha Desert Management Plan (1985). A change to Class "L" would provide more protective management and would improve the Bureau's potential for halting the decline of resources in this sensitive area.

Implementation Needs

None



District Manager

09/22/89

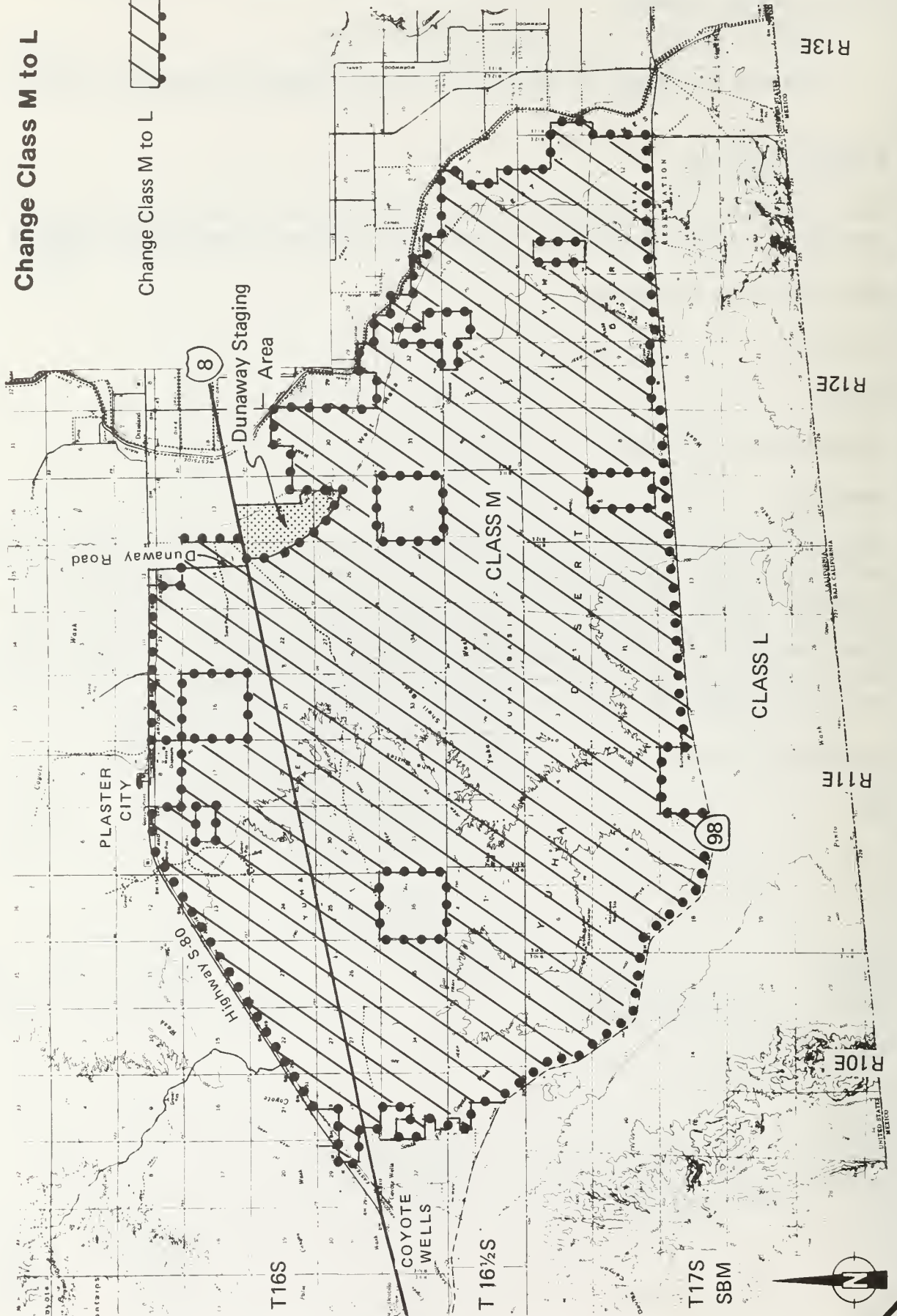
Date

YUHA BASIN

Change Class M to L



Change Class M to L



AMENDMENT NINE

CHANGE CLASS "M" TO CLASS "L" IN EAST MESA AREA

Proposed Amendment

Change the MUC from "M" to "L" in the East Mesa Desert between Highway 78 and the Mexican border, and between the East Highline Canal and the Old Coachella Canal. (Exclude Long Term Visitor Areas and the Gordons's Well Camp Site).

Other Alternatives Considered

No Action

Decision

Accept Proposed Amendment

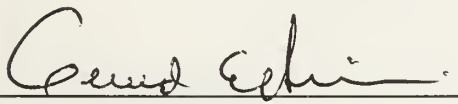
Rationale

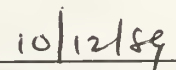
Since adoption of the Desert Plan in 1980, the population of the flat-tailed horned lizard (FTHL) has declined significantly in some parts of its range in southeast California, southern Arizona, and portions of Baja California. This decline led to the lizard's being designated as a "sensitive species" by the BLM and a candidate for listing by the U.S. Fish and Wildlife Service's Office of Endangered Species and the California Department of Fish And Game. The East Mesa is one of four crucial habitat areas in California, and the East Mesa ACEC was designated for protection of the species in 1980. Studies have shown that the crucial habitat extends west and north of the original boundaries.

Cultural resources along the Lake Cahuilla shoreline extend further to the east than originally indicated. These resources would also benefit from the added protection provided by changing the MUC to Class "L".

Implementation Needs

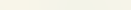



None

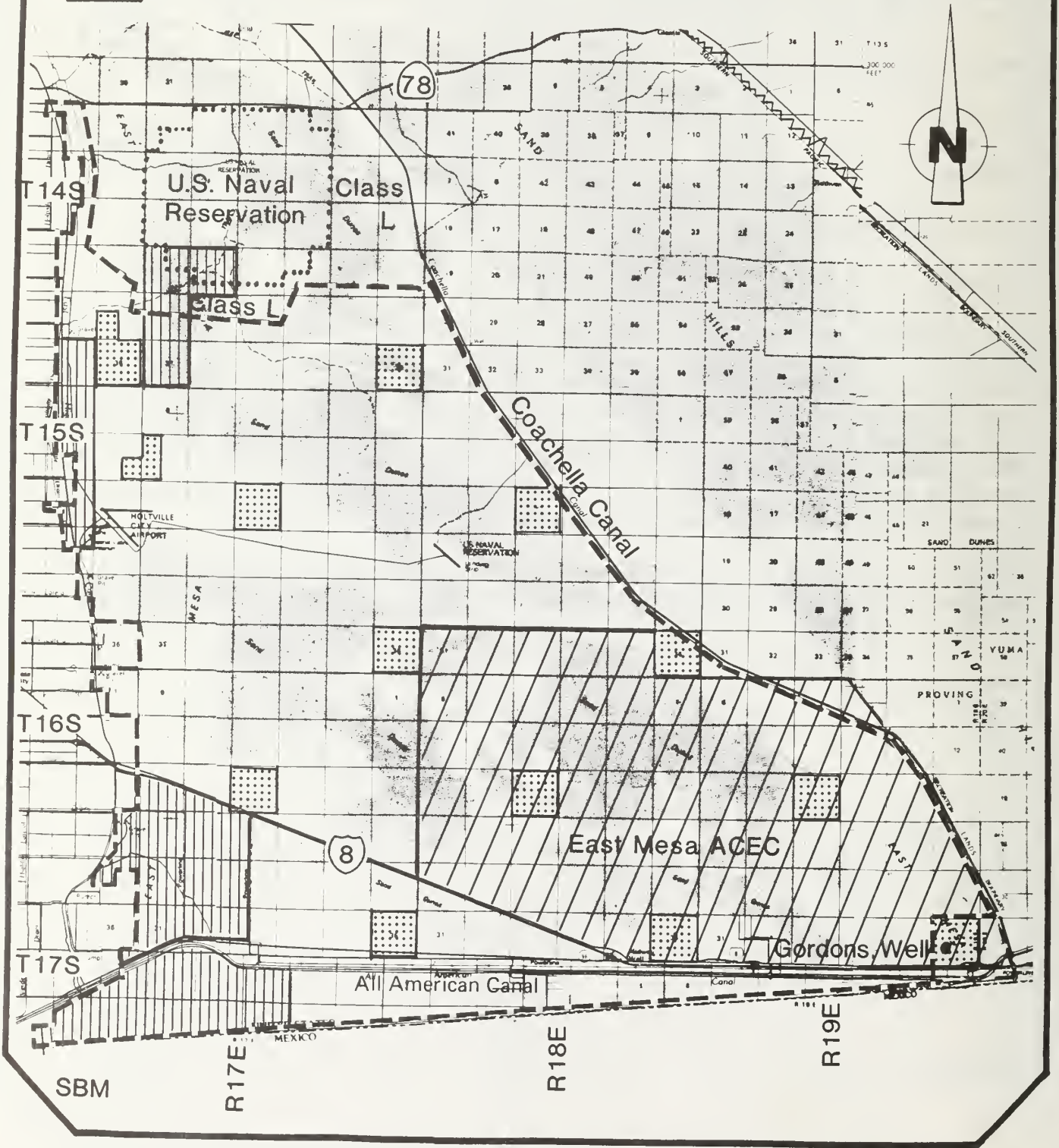

District Manager


Date

AMENDMENT 9

CLASS M TO L
EAST MESA

-  AMENDMENT BOUNDARY
-  EAST MESA ACEC
-  CAHUILLA ACECs
-  PRIVATE OR STATE LAND



AMENDMENT TEN

CHANGE CLASS "M" AREAS TO CLASS "L" IN EAST MOJAVE
NATIONAL SCENIC AREA

Proposed Amendment

Change all Class "M" areas within the East Mojave National Scenic Area to Class "L".

Other Alternatives Considered

B. Modify proposal to exclude the Mescal Range.

C. No Action

Decision

Accept Alternative A-(proposed amendment).

Rationale

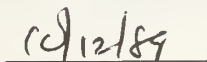
This action would meet the resource protection objectives of the East Mojave National Scenic Area Management Plan and would assure effective reclamation of impacts from mining and recreation use. The change would affect three areas (approximately 120,000 acres) which make up about 10% of the Scenic Area.

Implementation Needs

None



District Manager





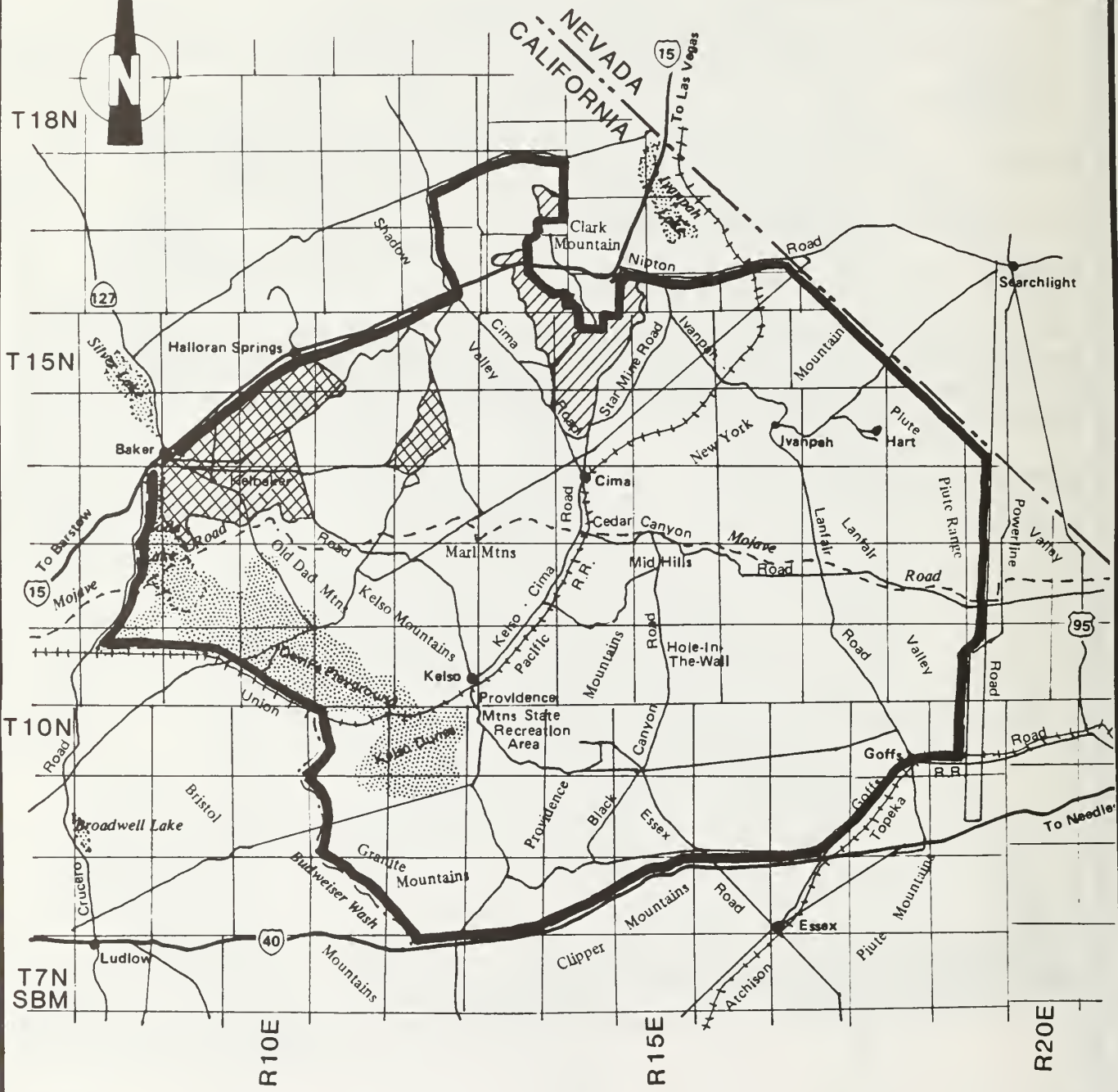
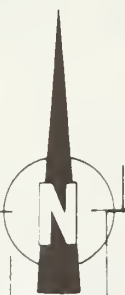
Date

EAST MOJAVE
NATIONAL SCENIC AREA
Change Class M to Class L

EMNSA Boundary

CHANGE FROM M TO L

- Alternative A 
- Alternative B 



AMENDMENT ELEVEN

CHANGE MUC FROM "M" TO "I" AND VEHICLE ACCESS FROM "LIMITED" TO "OPEN" IN AREA ADJACENT TO DUMONT DUNES OPEN AREA

Proposed Amendment

Change the MUC from "M" to "I" in the area adjacent to the Dumont Dunes Open Area (Area 1); change motorized vehicle access from "limited" to "open"

Other Alternatives Considered

- A. Add Area 2.
- B. Add Areas 2 and 3 to existing open area. Change Class "M" to Class "I" in Areas 2 and 3.
- C. Add Areas 2, 3, and 4 to open area. Change Class "M" to Class "I" in Areas 2, 3, and 4.
- D. No Action

Decision

Accept Alternative B.

Rationale

It was originally intended that the Dumont Dunes OHV open area would include subareas 1, 2, and 3. Maps for the CDCA Plan were drawn incorrectly. This oversight was discovered during the planning effort for the Dumont area. The amendment will correct this oversight. Addition of Subarea 2 will incorporate the historically used camping and staging area for the main dunes, while Subarea 3 will add the area used by families and novice riders.

Implementation Needs

1. Install appropriate boundary markers, including:
 - Stage 1: Boundary signs, boundary collector routes, and barriers/fencing along Highway 127 and at the north boundary of Salt Creek ACEC.
 - Stage 2: If Stage 1 items are insufficient add additional barriers/fences at other parts of the boundary.
2. Provide information/education materials for users, including a brochure, signs, and an information kiosk.
3. Initiate the designation process for routes of travel in areas adjacent to the open area.


District Manager


Date

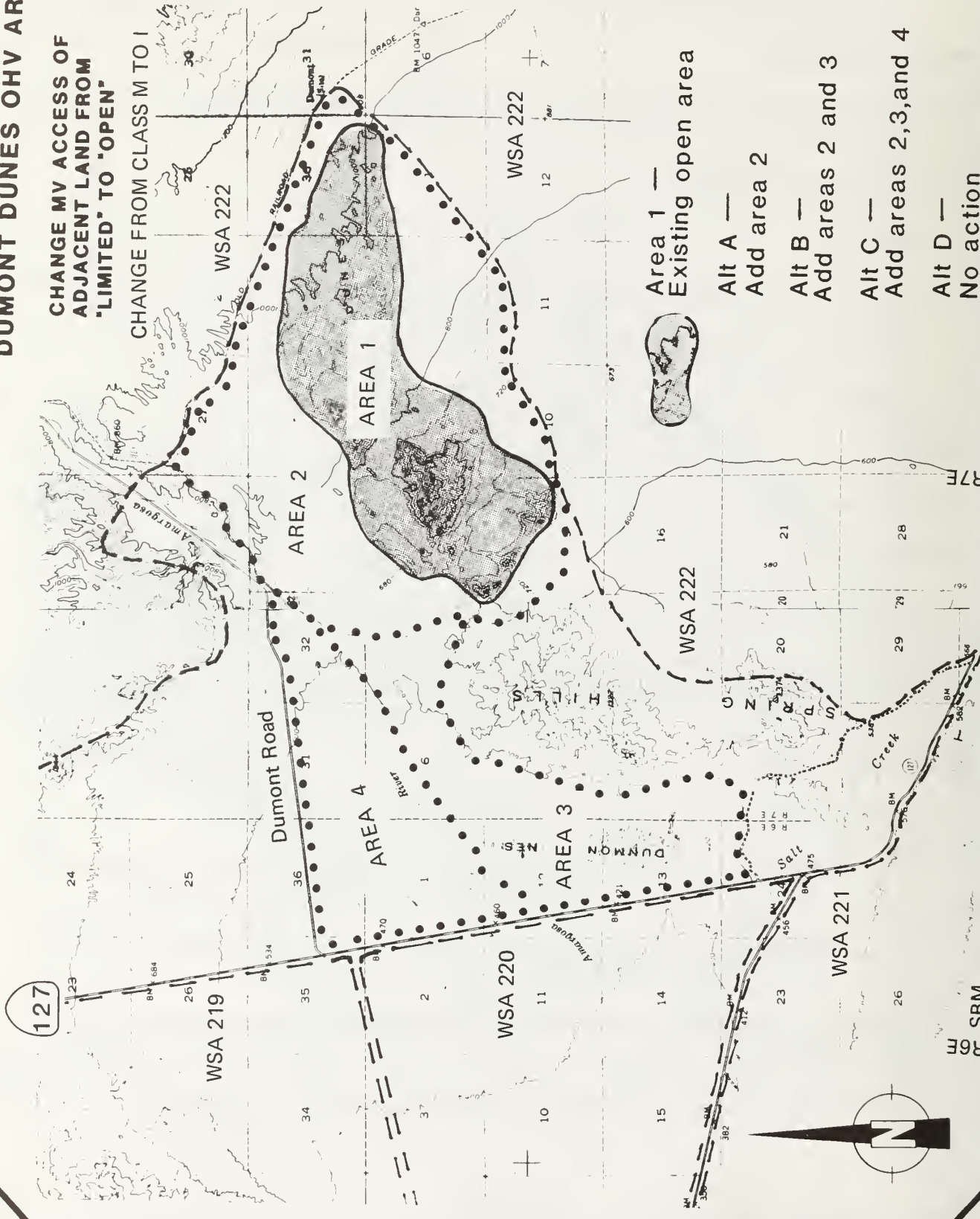
DUMONT DUNES OHV AREA

CHANGE MV ACCESS OF
ADJACENT LAND FROM
"LIMITED" TO "OPEN"

T19N

CHANGE FROM CLASS M TO I

T18N



AMENDMENT TWELVE

**CHANGE A PORTION OF IVANPAH DRY LAKE
FROM CLASS "L" TO CLASS "M"**

Proposed Amendment

Change the MUC of an area on the north end of Ivanpah Dry Lake, adjacent to Interstate 15 and the Nevada border, from "L" to "M" for construction of an airport.

Other Alternatives Considered

No Action

Decision

Reject Amendment

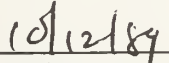
Rationale

Airport access to a Nevada casino would potentially increase aircraft traffic, necessitating restricted use of two interstate utility corridors for future transmission lines. The change would also result in "spot zoning" for a single, non-resident user which is not in accord with the Desert Plan. There would be impacts on soil and wildlife.

Implementation Needs

None

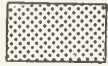

District Manager


Date

IVANPAH DRY LAKE



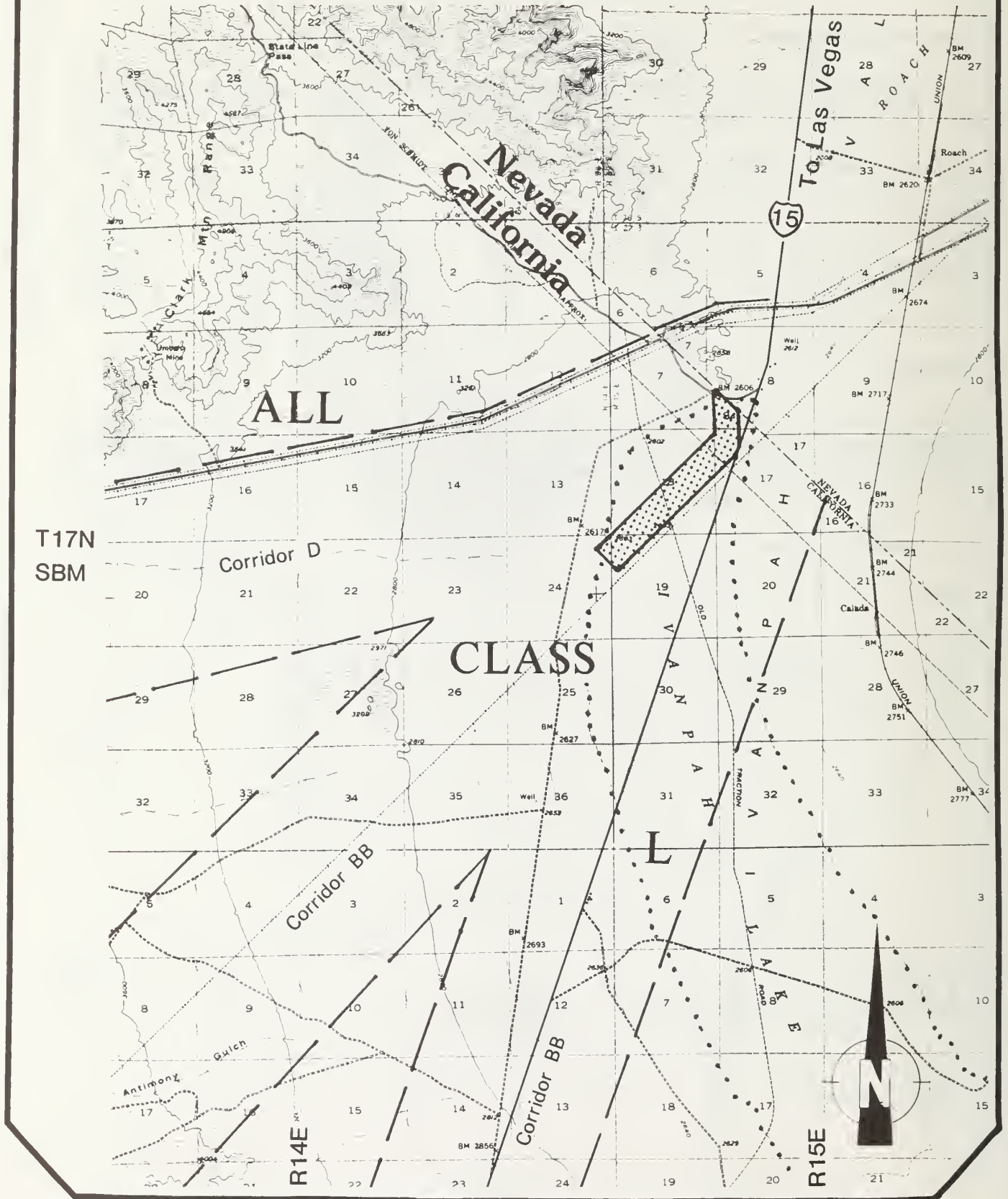
Ivanpah Dry Lake



Change From L to M



Utility Corridor (D and BB)



AMENDMENT THIRTEEN

DELETE A PORTION OF UTILITY CORRIDOR M

Proposed Amendment

Delete a portion of Utility Corridor M.

Other Alternatives Considered

No Action

Decision

Accept Proposed Amendment

Rationale

Since the Desert Plan was adopted in 1980, new data has been obtained about significant wildlife and cultural resources that occur along the ancient shoreline of Lake Cahuilla and adjacent areas. The County of Imperial has activated a utility corridor along the west side of the East Highline Canal for use by the Imperial Irrigation District as a route for a 230kv transmission project (Coachella Valley-Niland-El Centro). The cost and timeframe of mitigating the anticipated impacts of placing a transmission project within Corridor M would contraindicate use of the corridor as long as an alternative is available.

Implementation Needs

None



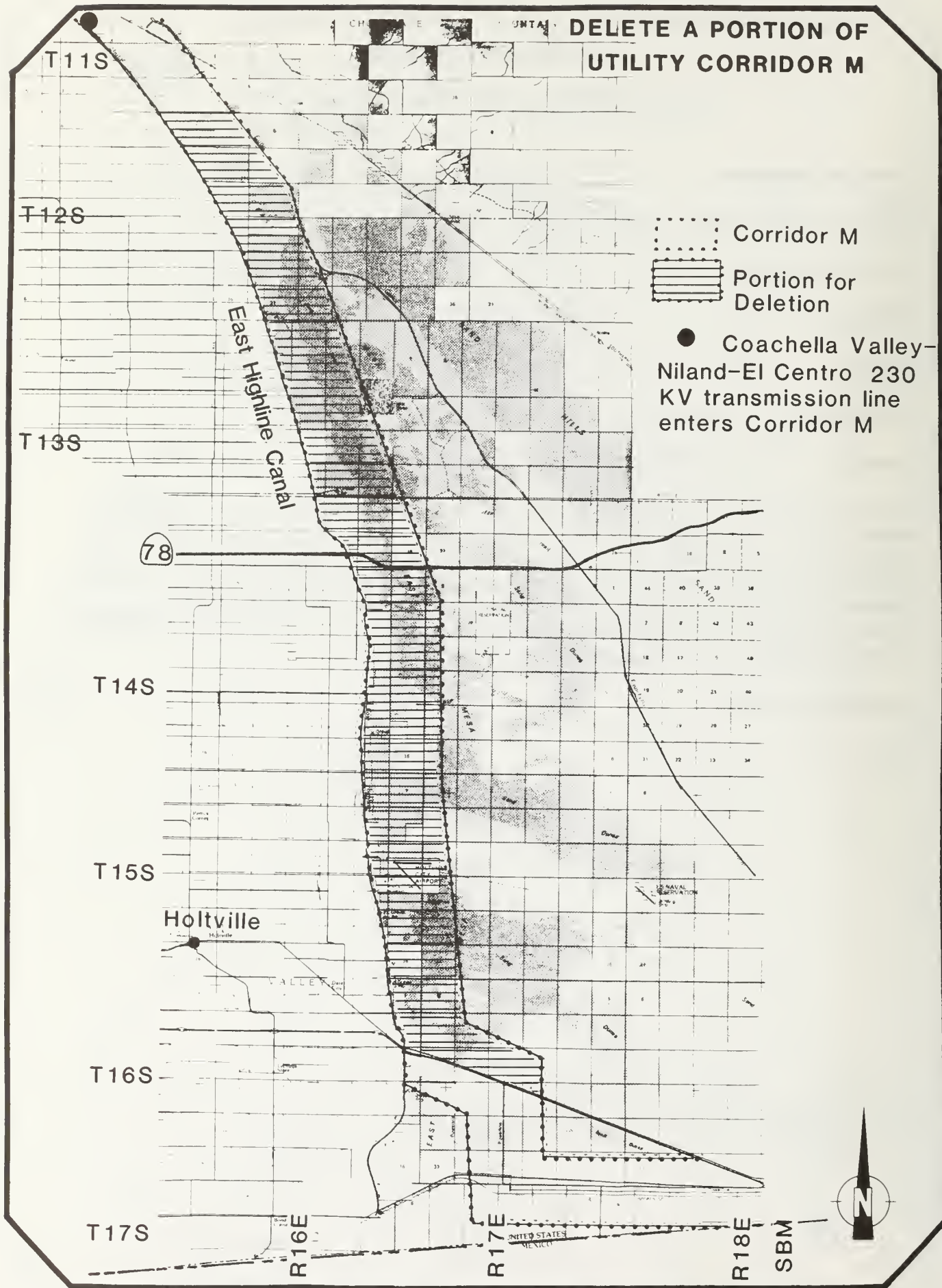
District Manager



Date

AMENDMENT 13

DELETE A PORTION OF
UTILITY CORRIDOR M



AMENDMENT FOURTEEN

DELETE A PORTION OF UTILITY CORRIDOR E

Proposed Amendment

Delete a segment of Utility Corridor E (1 mile by 9 miles) within the East Mojave National Scenic Area.

Other Alternatives Considered

No Action

Decision


Accept Proposed Amendment

Rationale

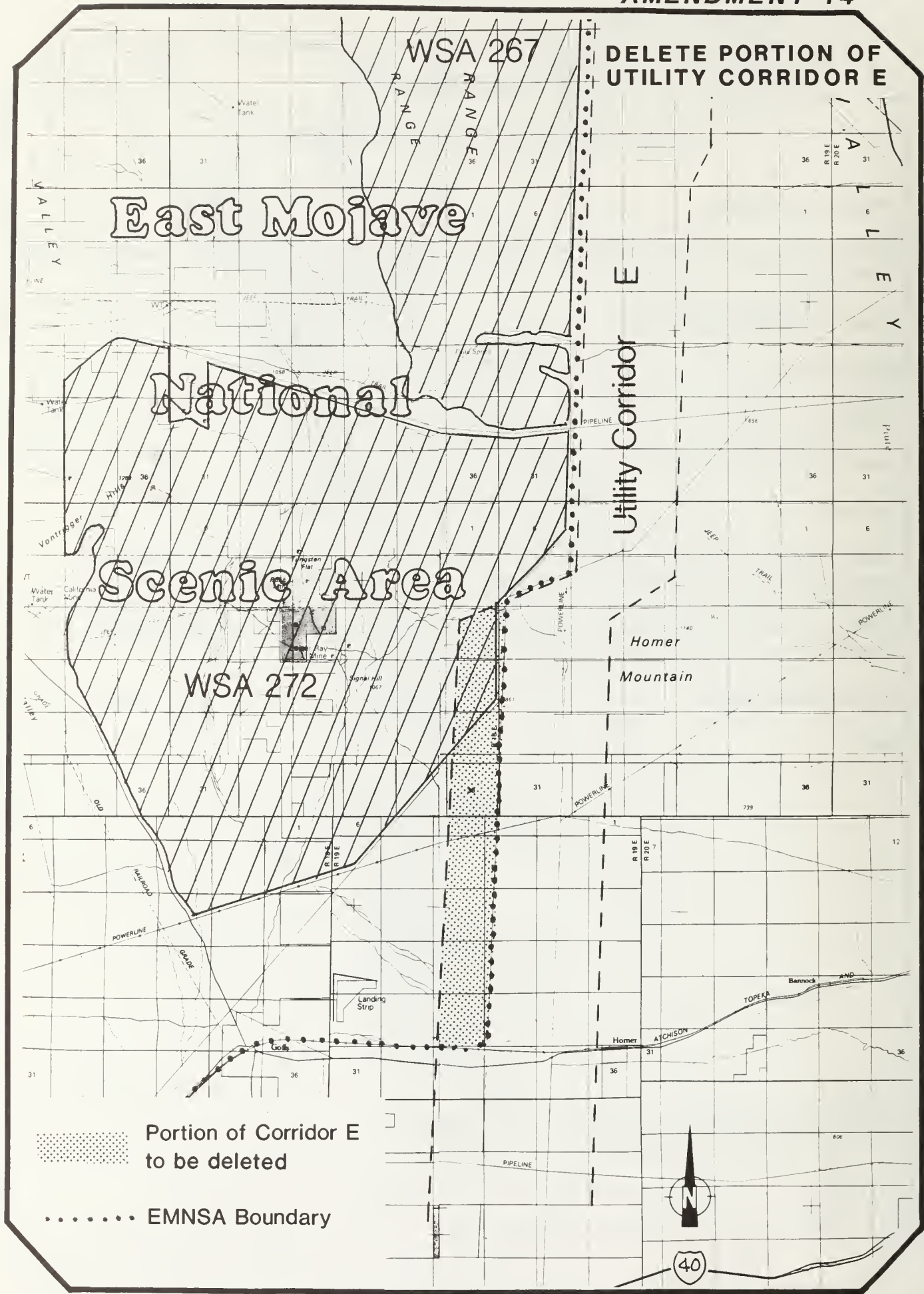
Utility Corridor E currently extends one mile into the Scenic Area along part of the eastern boundary. This proposal would delete that portion of the corridor, leaving a 2-3 mile-wide developable corridor. The proposal would conform to objectives of the East Mojave National Scenic Area Plan for visual resource management and would eliminate constraints imposed by a wilderness study area in this portion of the East Mojave.

Implementation Needs

None


District Manager


Date



DELETE PORTION OF UTILITY CORRIDOR E

East Mojave

National

Scenic Area

WSA 267

WSA 272

Utility Corridor E

Homer Mountain

Portion of Corridor E to be deleted

EMNSA Boundary



AMENDMENT FIFTEEN

ELIMINATE CONTINGENT CORRIDOR W

Proposed Amendment

Delete Contingent Utility Corridor W

Other Alternatives Considered

No Action

Decision

Accept Proposed Amendment

Rationale

The Desert Plan listed this corridor as having potential for future development, but required a plan amendment to designate it formally as a utility corridor. The East Mojave Plan determined that such development would not conform to resource management objectives and recommended that the corridor be eliminated from future consideration.

Implementation Needs

None



District Manager



Date

AMENDMENT SIXTEEN

CHANGE VEHICLE ACCESS FROM "LIMITED" TO "CLOSED"
IN CHUCKWALLA DUNE THICKET ACEC (#57)

Proposed Amendment

Change motorized vehicle access in the Chuckwalla Dune Thicket ACEC from "limited" to "closed."

Other Alternatives Considered

No Action

Decision


Accept Proposed Amendment

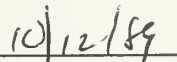
Rationale

The ACEC Management Plan for this ACEC recommended closure of the area of approximately 2,000 acres for protection of significant and sensitive wildlife values from inadvertant damage by motorized vehicles.

Implementation Needs

None


District Manager


Date

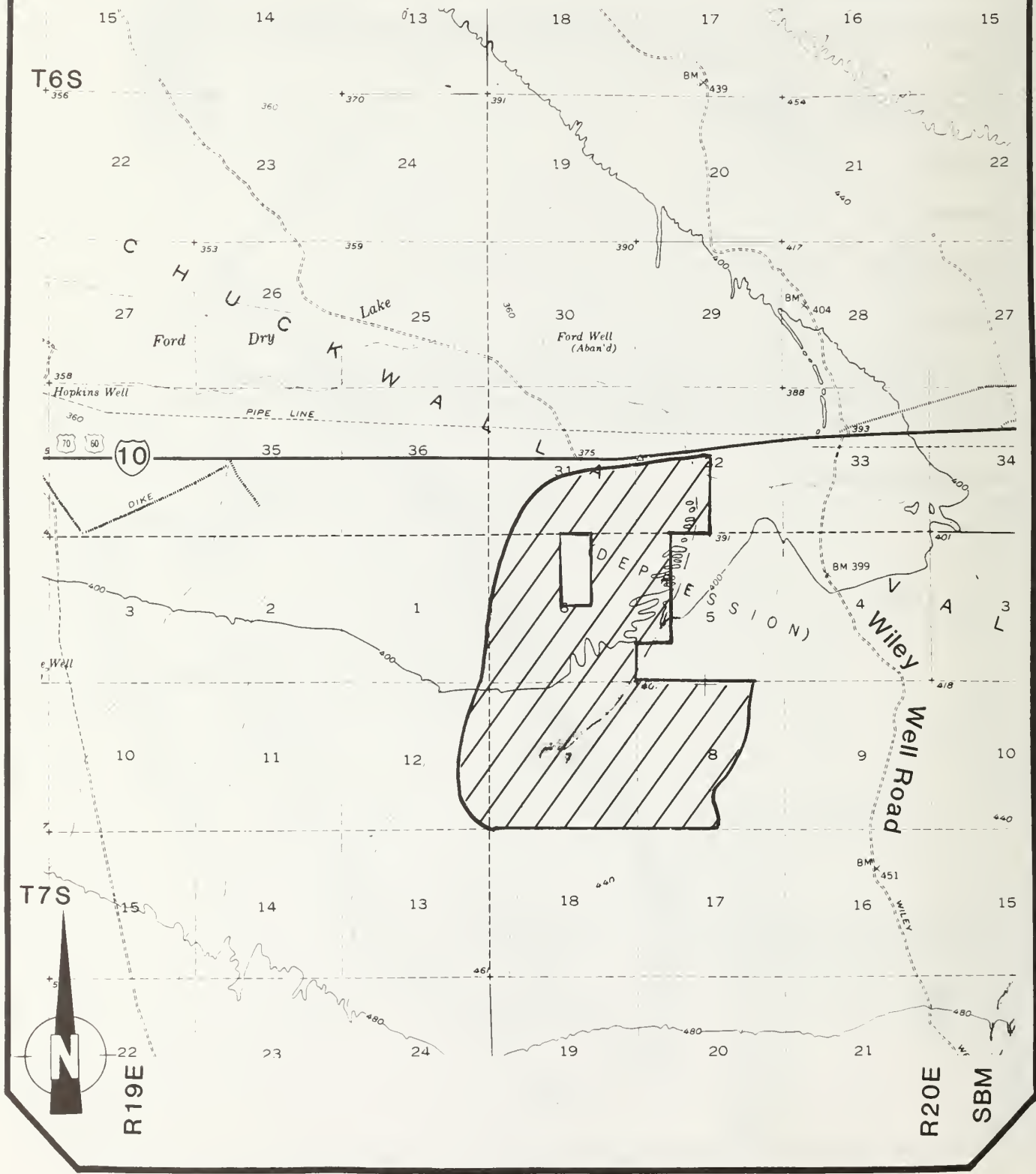
AMENDMENT 16

CHUCKWALLA VALLEY DUNE THICKET ACEC

Change Motorized Vehicle Access
from Limited to Closed



ACEC



AMENDMENT SEVENTEEN

CHANGE VEHICLE ACCESS FROM "LIMITED" TO
CLOSED" IN THE PALEN DRY LAKE AREA

Proposed Amendment

Change motorized vehicle access in the Palen Dry Lake ACEC from "limited" to "closed."

Other Alternatives Considered

No Action

Decision

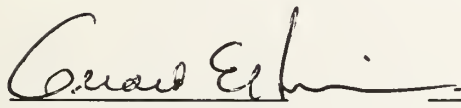
Accept Proposed Amendment

Rationale

The management plan for this ACEC recommended closure of the area for protection of cultural resources from motorized vehicle use.

Implementation Needs

None


District Manager

10/12/89
Date

AMENDMENT EIGHTEEN

PROHIBIT GRAZING SOUTH OF INTERSTATE-10
IN THE FORD DRY LAKE ALLOTMENT

Proposed Amendment

Prohibit livestock grazing south of Interstate-10 in the Ford Dry Lake Allotment.

Other Alternatives Considered

No Action

Decision

Accept Proposed Amendment

Rationale

Recent loss of the entire population of 50 mountain sheep in the Warner Mountains to pneumonia as a result of Pasturella hemolytica infection in combination with known recent contact with domestic sheep indicates a fatal infection was introduced by domestic sheep to the mountain sheep. Domestic sheep have also been documented as a source of infection. The California Department of Fish and Game plans to augment the bighorn sheep population in the Chuckwalla Mountains but would probably not do so if the Ford Dry Lake Allotment, which is ephemeral range and grazed intermittently, remains open to domestic sheep grazing.

Implementation Needs

None



District Manager



Date

FORD DRY LAKE
GRAZING ALLOTMENT

Prohibit Grazing
South of Interstate 10

Ford Dry Lake Allotment

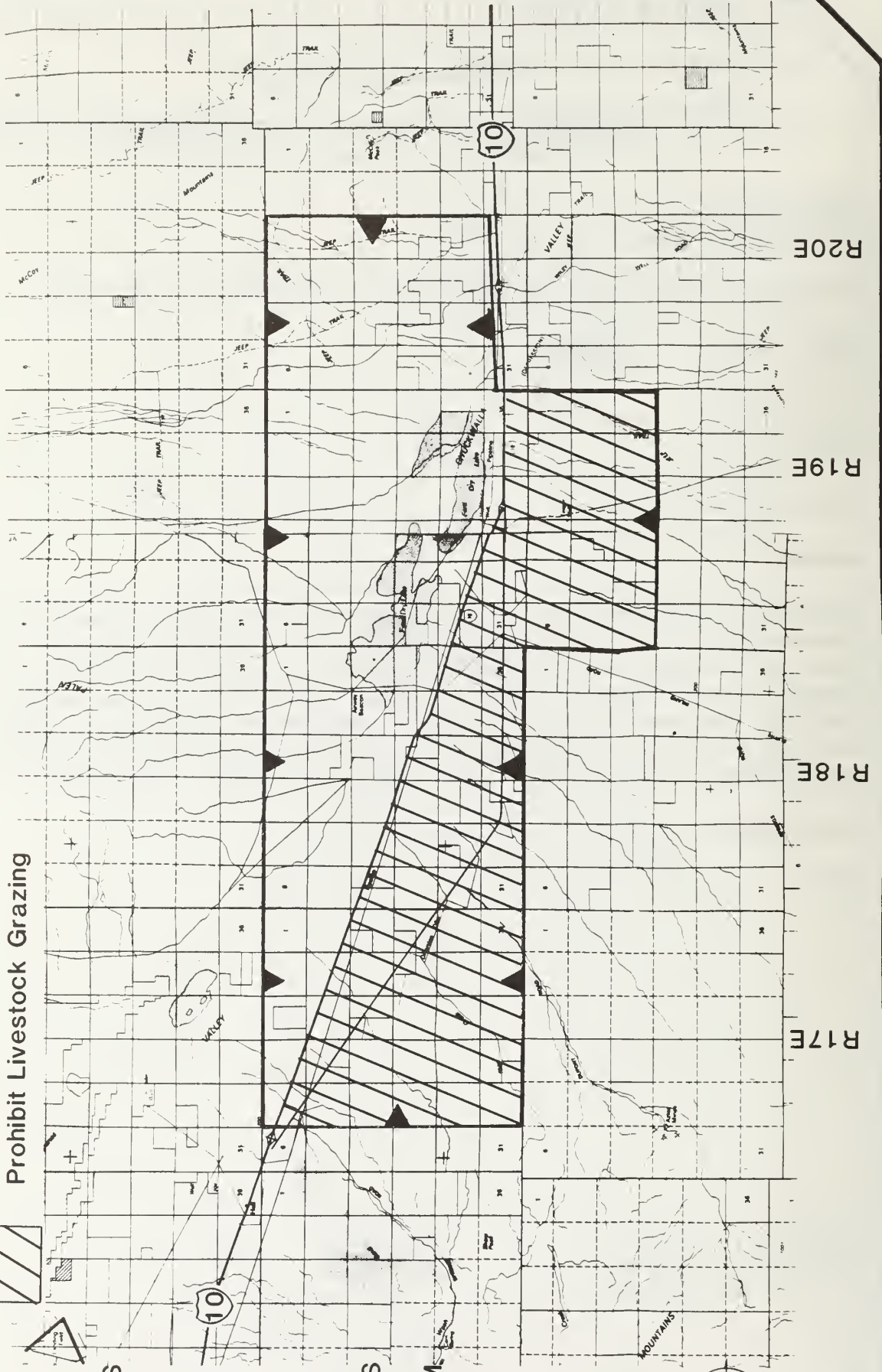
Prohibit Livestock Grazing



T5S

T6S

SBM



AMENDMENT NINETEEN

NEW GRAZING ALLOTMENT NEAR DAGGETT

Proposed Amendment

Establish a new ephemeral grazing allotment near Daggett.

Other Alternatives Considered

B. Modify proposal so that Camp Rock Road is the eastern boundary of the allotment.

C. No Action

Decision

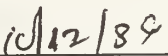
Reject Amendment

Rationale

The proposed allotment is within the range of the Newberry Mountain bighorn sheep herd. Insufficient information is available on this herd and on the possible effect of domestic sheep. In addition, the allotment would be within the habitat of the desert tortoise, which was given an emergency listing as an endangered species by the U.S. Fish and Wildlife Service on August 4, 1989. An additional grazing allotment in tortoise habitat would be inappropriate while this listing is in effect.

Rejection of the amendment would be consistent with the "I-40 Compromise" of the CDCA Plan, which designated that all range south of I-40 be managed to increase the habitat of the desert bighorn. Accepting the amendment would, in the best case, provide for maintenance of bighorn habitat, and, in the worst case, could adversely affect the bighorn, themselves. Nothing in this rejection shall effect on-going trailing authorizations to the extent that sheep skirt the edge of this range.


District Manager


Date

AMENDMENT 20

PILOT KNOB GRAZING ALLOTMENT CLASS CHANGE

Proposed Amendment

Change range classification of the Pilot Knob grazing allotment from ephemeral to ephemeral/perennial.

Alternatives Considered

- A. Allow year-round grazing (refer to environmental assessment).
- B. Allow use from March to October.
- C. No action.

Decision

Accept Alternative A with modification. Change range classification to perennial.

Rationale

As requested in the Record of Decision for the 1983 CDCA Plan Amendments, the Ridgecrest Resource Area completed the Pilot Knob Allotment Management Plan (AMP) and an environmental assessment (EA) of its proposed actions. The AMP and EA have been reviewed by the public. The Bureau has consulted with the U.S. Fish and Wildlife Service (USFWS) about the effect of implementation of the AMP on the desert tortoise, which was designated an endangered species under an emergency listing on August 4, 1989.

When implemented, the AMP will institute specific actions to reduce conflicts between cattle grazing and tortoises. Fences and other facilities will be constructed so that cattle can be moved to areas outside of tortoise habitat during the periods when tortoises are active and feeding. Cattle will be allowed inside tortoise habitat only when tortoises are inactive and underground. These actions will improve and stabilize perennial plant vigor by controlling livestock distribution throughout the allotment.

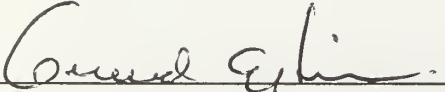
Implementation Needs

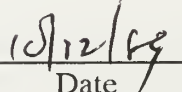
Construct fences, pipelines, and a well.

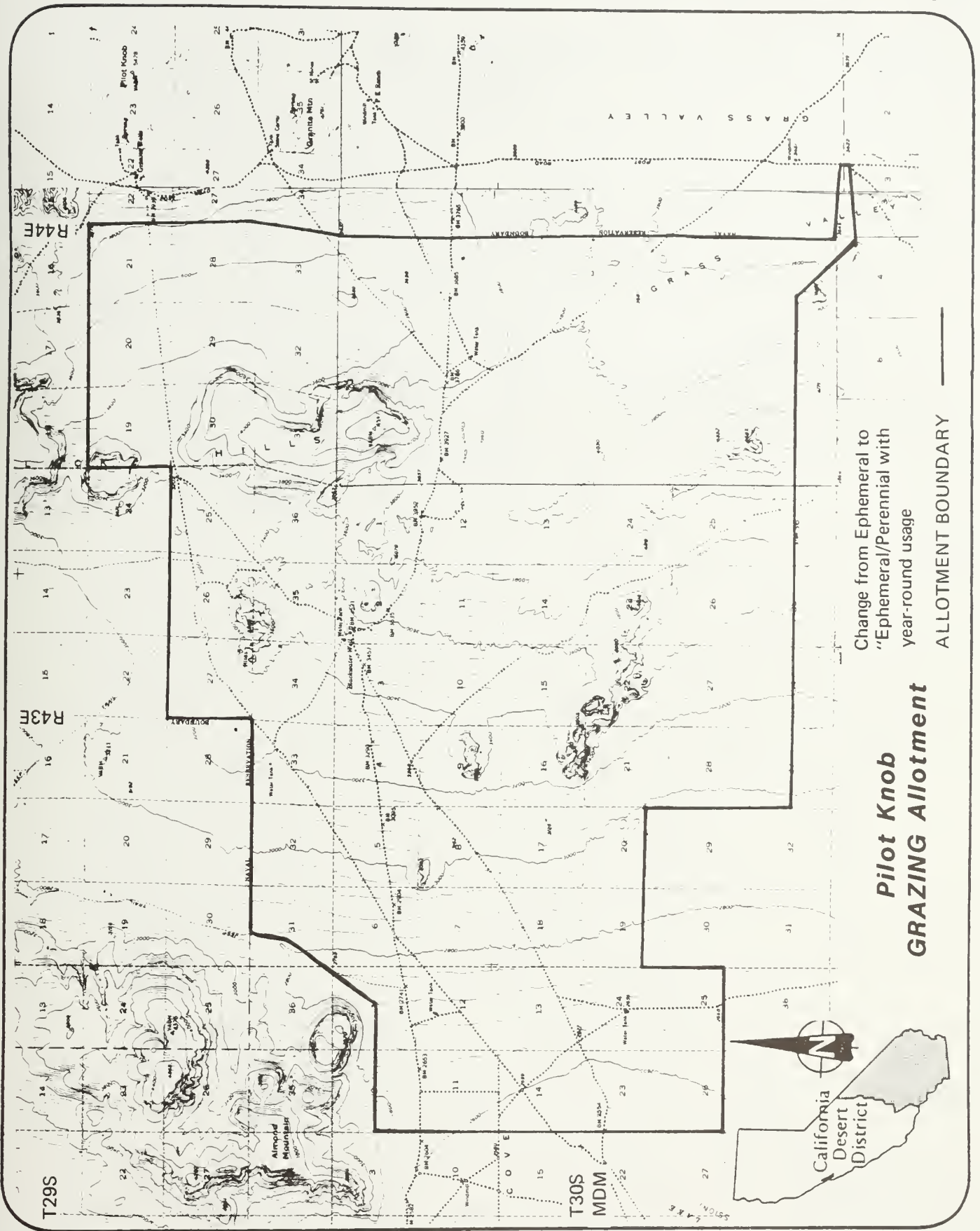
Since part of the allotment is within Wilderness Study Area 173 (recommended as non-suitable), preference will not be granted until after Congress decides on wilderness status. Until that time, AUMs will be allocated on a temporary non-renewable basis.

Supplemental Information

This amendment was introduced in the 1983 Plan Amendment cycle. However, due to insufficient resource and management information at that time, the decision to accept the amendment was deferred until completion of the allotment management plan and environmental assessment.


District Manager


Date



COMMENTS & RESPONSES

WRITTEN COMMENTS AND RESPONSES

The BLM received a total of 32 letters addressing the proposed amendments during the public comment period. All letters were reviewed. Those letters that had substantive comments (i.e., questions or issues that had a direct bearing on a proposed amendment) were given a response. Table 1 lists each comment letter in order of receipt and designates a reference number. Within the letter the substantive remarks are noted and the response is keyed to the appropriate comment.

All comment letters have been reprinted verbatim and substantive comments addressed. Letters that did not address substantive issues but presented an opinion are acknowledged by their inclusion.

TABLE I
COMMENT LETTERS

Letter Number	Source of Letter
1	Beverly Childs McIntosh, Riverside County Planning Dept.
2	H.G. Wilshire, Mountain View, CA
3	Peter Burk, Citizens for Mojave National Park, Inc.
4	Dale A Musegades, U.S Border Patrol
5a	Pete Bontadelli, CA. Department Fish and Game
5b	Dennis J. O'Bryant, CA Division of Mines and Geology
6	Mary Ann Henry, Ridgecrest
7	Richard Spotts, Defenders of Wildlife
8	Edward Karapetian, Dept. of Water & Power, City of L.A.
9	Fred Simon, Kern County Planning & Development, Bakersfield
10	Robert D. Johnstone, U.S. Air Force, Edwards Air Force Base

TABLE I (CONT.)

- 11 Donald W. Moore, Audubon Society, Yuma Chapter
- 12 Edwin L. Rothfuss, Death Valley National Monument
- 13 Brooks Harper, U.S. Fish & Wildlife Service, Laguna Niguel
- 14 Elizabeth Forgey, Boron, CA
- 15 John R. Swanson, Minneapolis, MN
- 16 Vincent Yoder, CA Native Plant Society, Bristlecone Chapter
- 17 Jay B. Wilson, California Woolgrowers Association
- 18 Donald W. Moore, Audubon Society, Kerncrest Chapter
- 19 William E. Rinne, U.S.D.I., Bureau of Reclamation
- 20 Emery Henrich, Mojave, CA
- 21 Kenneth B. Jones, CA Dept. Parks & Recreation, San Diego
- 22 Jeffery J. Tunnell, Gear Grinders Four Wheel Drive Club
- 23 Cary W. Meister, Audubon Society, Yuma Chapter
- 24 Elden Hughes, Whittier, CA
- 25 Mary L. Grimsley, Ridgecrest, CA
- 26 Jerry D. Grimsley, Ridgecrest, CA
- 27 Elden Hughes, Whittier, CA
- 28 Judith Anderson, Sierra Club - So. Cal. Reg'l. Conserv. Comm.22
29. Patrice Davison, CA Assn. 4-WD Clubs
30. Hi Desert Multiple Use Coalition, Ridgecrest
31. Wayne Rettig, Ridgecrest
32. Suzanne Shettler, CA Native Plant Soc, Carmel Valley, CA

188EA 002

RECEIVED
BUREAU OF LAND MANAGEMENT

1989 JUL 13 PM 2:52

July 9, 1989

CALIF. DESERT DISTRICT
RIVERSIDE, CA.

California Desert District
Bureau of Land Management
ATTN: Plan Amendments
1695 Spruce St.
Riverside, CA 92507


2

Dear Sirs,

I favor Alternative A for Amendments 1-4, 8-10, and 13-18; Alternative B for Amendments 7 and 12; Alternative D for Amendment 11, and Alternative C for Amendment 19.

2-1 [If, as indicated for Amendment 11, "manageable boundaries" is the principal criterion for expanding Dumont Dunes ORV Open Area, it would seem to me that complete closure of the area would go even farther toward accomplishing that end.

Sincerely,



H.G. Wilshire
1348 Isabelle Ave.
Mtn. View, CA 94040

Response to H. G. Wilshire

Response to 2-1

In 1973, the Interim Critical Management Program for Recreation Vehicle Use on the California Desert established the Dumont Dunes Open Area, based on historical recreational use. In 1980, the Desert Plan continued that designation. Because of the popularity and longtime use of this area, closure of the dunes without adequate environmental grounds would be unfair to many recreationists and could result in difficulties in enforcing the closure.



CITIZENS FOR MOJAVE NATIONAL PARK, INC.
P.O. BOX 106 BARSTOW, CALIFORNIA 92312

ESTABLISHED 1976

California Desert District
Bureau of Land Management
ATTN: Plan Amendments
1695 Spruce Street
Riverside, CA 92507

3

Dear Mr. Hillier;

21 June 1989

Thank you for sending us a copy of the the proposed 1988 plan amendments to the Desert Plan. Below are our comments on the Proposed 1988 Amendments to the CDCA EA.

We support Alternative A of Plan Amendment #10. All Class M areas in EMNSA should be redesignated Class L. It is contradictory that National Scenic Area lands should be anything less than Class L. All the areas, including the Mescal & Ivanpah mountains merit Class L status due to their wildlife, scenic, botanic and cultural values.

We are opposed to Plan Amendment #12. We support Alternative B--reject the amendment. We see no need for an airport on Ivanpah Dry Lake. Our public lands do not exist for Whiskey Pete's Casino's profits. If Whiskey Pete's wants to build an airport, let them build it on private land in Nevada. The proposed airport would be a nuisance, add noise pollution, and be a visual disaster to the wonders of East Mojave National Scenic Area. The proposed airport lies in and near crucial desert tortoise habitat and the proposed airport would decimate tortoise populations in the area.

We support Alternative A of Plan Amendment #14. By deleting a segment of Utility Corridor E within the southeast corner of EMNSA, visual and scenic resources will be preserved. The utility corridor will still exist but will be moved outside EMNSA, slightly to the east. By eliminating this segment of the utility corridor, the Signal Hill WSA can be better protected and managed.

We support Alternative A of Plan Amendment #15. By deleting Contingent Utility Corridor W, a great amount of EMNSA's scenic quality will not be threatened. New transmission corridors are not appropriate in a National Scenic Area.

Outside the EMNSA area, we are opposed to plan amendment #19. We support Alternative C to reject the amendment to establish a new ephemeral grazing allotment near Daggett. We want to see bighorn sheep protected from the diseases of domestic sheep and cattle.

Thank you for your consideration of our responses. We believe that "Take Pride in America" means managing our public lands to protect natural and cultural resources.

Sincerely,

Peter Burk
Peter Burk, President

U. S. BORDER PATROL

Immigration & Naturalization Service

1111 North Imperial Avenue

Post Office Box 60

El Centro, California 92244

Office of the Chief Patrol Agent



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1989 JUN 21 PM 2:35

CALIF. DESERT DISTRICT
RIVERSIDE, CA

4

ROUTING TO:	DATE:	INIT:
ADM	2/6/25	JA
SA		
FIPE		
P&EC	1/6/22	EC
PA		
Admin		
QPS		
RES		
INLV		
AMS		
ACTION BY:		
RETURN TO: copy to EC		

June 20, 1989

ELC 40/92-C

Mr. Gerald Hillier, District Manager
 California Desert District
 Bureau of Land Management
 1695 Spruce Street
 Riverside, California 92507

Dear Mr. Hillier:

We received a copy of the Proposed 1988 Plan Amendments for the California Desert Conservation Area and noted a couple of proposals which trouble us.

Proposal numbers 8 and 9 involve changing the multiple class use from "M" to "L". We have no objections to the change as it affects the general public. However, our responsibility for patrolling the International Boundary should warrant a specific exemption. Illegal alien and drug traffickers cannot be given free reign because of restrictions which could potentially limit our ability to carry out our congressional mandate.

4-1

We would like to go on record as opposing the change in class from "M" to "L" unless we can be given assurances that it would not limit our operations. ✓

Thank you for the opportunity to provide comments on this issue.

Sincerely,

Dale A. Musegades
 Dale A. Musegades
 Chief Patrol Agent

Response to U. S. Border Patrol

Response to 4-1

The proposed change in multiple-use classification from "M" to "L" is based on new information and is intended to enable BLM to better manage the wildlife and cultural resources present in the Yuha Desert and the East Mesa areas. Congress has mandated the protection of severely declining species such as the flat-tailed horned lizard which occurs in these areas.

The change will not affect vehicle use on existing roads. In order to protect sensitive resources, the Bureau allows cross-country travel only where it is absolutely necessary; e.g., law enforcement and life-threatening situations. We plan to continue our program of mutual cooperation with the U.S. Border Patrol.



State of California

88EA 005

GOVERNOR'S OFFICE
OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814

GEORGE DEUKMEJIAN
GOVERNOR

(916) 323-7480

DATE: July 13, 1989

TO: U. S. Bureau of Land Management
California Desert District
ATTN: Irene Rice
1695 Spruce Street
Riverside, CA 92507

FROM: Office of Planning and Research
State Clearinghouse

RE: Environmental Assessment, Proposed Plan Amendments to the California
Desert Conservation Area, Plan of 1980 (SCH 89061602)

As the designated California Single Point of Contact, pursuant to Executive Order 12372, the Office of Planning and Research transmits attached comments as the State Process Recommendation.

This recommendation is a consensus; no opposing comments have been received. Initiation of the "accommodate or explain" response by your agency is, therefore, in effect.

Sincerely,

Robert P. Martinez
Director

Attachment

cc: Applicant

Resources Building
1416 Ninth Street
95814

(916) 445-5656
TDD (916) 324-0804

California Conservation Corps
Department of Boating and Waterways
Department of Conservation
Department of Fish and Game
Department of Forestry
Department of Parks and Recreation
Department of Water Resources

GEORGE DEUKMEJIAN
GOVERNOR OF
CALIFORNIA



THE RESOURCES AGENCY OF CALIFORNIA
SACRAMENTO, CALIFORNIA

Air Resources Board
California Coastal Commission
California Tahoe Conservancy
California Waste Management Board
Colorado River Board
Energy Resources Conservation and Development Commission
San Francisco Bay Conservation and Development Commission
State Coastal Conservancy
State Lands Division
State Reclamation Board
State Water Resources Control Board
Regional Water Quality Control Boards

U. S. Bureau of Land Management
California Desert District
ATTN: Irene Rice
1695 Spruce Street
Riverside, CA 92507

July 13, 1989

Dear Ms. Rice:

The State has reviewed the Environmental Assessment, Proposed Plan Amendments to the California Desert Conservation Area, Plan of 1980, submitted through the Office of Planning and Research.

We coordinated review of this document with the California Highway Patrol, State Lands Commission, Lahontan and Colorado River Regional Water Quality Control Boards, Colorado River Board, and the Departments of Conservation, Fish and Game, Parks and Recreation, and Transportation.

The Departments of Fish and Game, and Conservation have provided the attached comments for your consideration.

Thank you for providing an opportunity to review this document.

Sincerely,

for Gordon F. Snow, Ph.D.
Assistant Secretary for Resources

Attachments

cc: Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814
(SCH 89061602)

Memorandum

To : The Honorable Gordon K. Van Vleck
Secretary for Resources
1416 Ninth Street
Sacramento, CA 95814

Date : July 7, 1989

Attention Gordon F. Snow, Ph.D.
Projects Coordinator

5a

From : Department of Fish and Game

Subject : Proposed 1988 Plan Amendments to the California Desert
Conservation Area, Bureau of Land Management (BLM), SCH 89061602

The Department of Fish and Game has reviewed the Draft Environmental Assessment (EA) for the proposed 1988 amendments to the California Desert Plan. The EA describes the environmental effects of accepting or rejecting each of the 19 proposed amendments accepted by the BLM for review. We have the following comments on the proposed amendments:

Amendment 3, Designate an Area of Critical Environmental Concern (ACEC) at Dedeckera Canyon and the Adjoining Area for Botanical and Other Significant Resources.

We support adoption of the proposed amendment.

Amendment 5, Delete ACEC No. 28, Camp Irwin Boundary.

We support adoption of the proposed amendment.

Amendment 6, Delete ACEC No. 38, Kramer Hills.

We support adoption of the proposed amendment.

Amendment 8, Change the Multiple Use Class from "M" (Moderate) to "L" (Low) in the Portion of the Yuha Desert Management Area between Highways 80 and 98 (Excluding the Dunaway Staging Area).

We support adoption of the proposed amendment.

Amendment 9, Change the Multiple Use Class from "M" to "L" in the East Mesa Desert between Highway 78 and the Mexican Border, the East Highline and the Old Coachella Canals (Excluding Long-Term Visitor Areas and the Gordons's Well Camp Site).

We support adoption of the proposed amendment.

Amendment 10, Change all Class "M" Areas within the East Mojave National Scenic Area to Class "L".

We support adoption of the proposed amendment.

The Honorable Gordon K. Van Vleck -2-

July 7, 1989

Amendment 11, Change the Multiple Use Class from "M" to "I" (Intensive) in the Area Adjacent to the Dumont Dunes "Open Area"; Change Motorized Vehicle Access from "Limited" to "Open".

5a-1

We support adoption of the preferred alternative (adoption of Alternative B; add areas 2 and 3) provided that boundary fences are established between areas 2 and 3 and the Salt Creek Hills and Salt Creek ACEC. Off highway vehicle activity is currently impacting the west side of the Salt Creek Hills.

Amendment 12, Change the Multiple Use Class of an Area on the North End of Ivanpah Dry Lake, Adjacent to Interstate 15 and the Nevada Border, from "L" to "M" for Construction of an Airport.

We support adoption of the preferred alternative to reject the proposed amendment. The placement of an airport in this area could negatively impact the Ivanpah Desert Tortoise Crucial Habitat Area through cumulative impacts to the tortoise caused by increased traffic and development within the region of the airport.

Amendment 15, Delete Contingent Utility Corridor W.

We support adoption of Alternative A.

Amendment 16, Change Motorized Vehicle Access in the Chuckawalla Dune Thicket ACEC from "Limited" to "Closed".

We support adoption of Alternative A. Motorized vehicle access into this area is an inappropriate use.

Amendment 17, Change Motorized Vehicle Access in the Palen Dry Lake ACEC from "Limited" to "Closed".

We support adoption of Alternative A. Motorized vehicle use in this area is an inappropriate use.

Amendment 18, Prohibit Livestock Grazing South of Interstate 10 in the Ford Dry Lake Allotment.

We support adoption of Alternative A. The Department has previously recommended the elimination of livestock grazing in the area due to the potential of spreading disease to bighorn sheep from contact with domestic sheep. Potential negative impacts to the desert tortoise caused by the grazing use within its habitat is another major consideration in our support of this alternative.

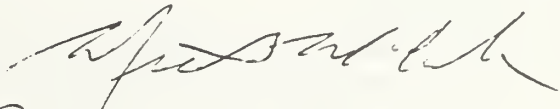
Amendment 19, Establish a New Ephemeral Grazing Allotment near Dagget.

We support the selection of adopting Alternative C to reject this amendment.

The Honorable Gordon K. Van Vleck -3-

July 7, 1989

Thank you for the opportunity to review and comment on the EA. If you have any questions, please contact Fred Worthley, Regional Manager of Region 5, at 330 Golden Shore, Suite 50, Long Beach, CA 90802 or by telephone at (213) 590-5113.



Pete Bontadelli
Director

Response to California Department of Fish and Game

Response to 5a-1

The Dumont Dunes Management Plan will indicate a tiered set of management actions to deal with encroachments into areas surrounding the OHV area. Signing routes closed and monitoring is the first step. If signing is not effective, the next step will be fencing. The Salt Creek Hills ACEC Management Plan has been amended to include a fence on the northern boundary of the ACEC near the Little Dunes. Construction is scheduled for 1990.

Memorandum

To : Dr. Gordon F. Snow
Assistant Secretary for Resources

Date : July 10, 1989

Ms. Irene Rice
U. S. Bureau of Land Management
1695 Spruce Street
Riverside, California 92507

Subject: Environmental
Assessment for the
Proposed 1988 Plan
Amendments to the
California Desert
Plan, SCH# 89061602

From : Department of Conservation—Office of the Director

5b

The Department of Conservation's Division of Mines and Geology (DMG) has reviewed the Environmental Assessment (EA) for the Proposed 1988 Plan Amendments to the California Desert Plan, and we offer the following comments for consideration.

Amendment 3

5b-1

The proposed Dedeckera Canyon Area of Critical Environmental Concern (ACEC) includes areas where the potential for economic industrial minerals has been recognized by DMG's Mineral Land Classification Program. DMG's work in this area (Taylor and Joseph, 1988) has determined that portions of the proposed ACEC are underlain by carbonate and siliceous rocks that elsewhere have comprised economic resources of limestone and silica. We recommend that consideration be given to the mineral potential of this area before adopting this ACEC.

If you have any questions concerning these comments, please contact Zoe McCrea, Division of Mines and Geology Environmental Review Officer, at (916) 322-2562.



Dennis J. O'Bryant
Environmental Program Coordinator

DJO:TM:efh

cc: Zoe McCrea, Division of Mines and Geology
Timothy McCrink, Division of Mines and Geology

Reference:

Taylor, G. C., and Joseph, S. E., 1988, Mineral Land Classification of the Eureka-Saline Valley Area, Inyo and Mono Counties, California: California Division of Mines and Geology Open-File Report 88-2.

Response to California Division of Mines and Geology

Response to 5b-1

Cliff wall and talus slopes within the upper portions of the canyon are composed of Paleozoic age carbonate and siliceous rocks (Department of Conservation, Division of Mines and Geology, 1988, Mineral Land Classification of the Eureka-Saline Valley Area, Inyo and Mono Counties, California, Open File Report 88-2, geologic map). These rocks, due to lack of interest in the area, distance to markets, and environmental restrictions in the area existing at this time, are recognized as having a low potential for development. This potential was considered in the review of the purpose of the ACEC. While the ACEC does not segregate the area from entry under the United States mineral laws, it is recognized that measures placed in operating plans, or modification of operating plans to protect natural and cultural resources in accordance with the prescriptions in the ACEC plan may limit access to these minerals. These tradeoffs are part of our consideration in the development and implementation of the ACEC plan.

RECEIVED

FIREARMS

329 Perdew
Ridgecrest, CA 93555
July 23, 1989

1989 JUL 25 PM 3 14

CALIF. DESERT DISTRICT
California Desert District
Bureau of Land Management
ATT: Plan Amendments
1695 Spruce St.
Riverside, California 92507

6

I have studied the 1988 Plan Amendments to the Calif. Desert Conservation Area Plan of 1980 and wish to make the following comments:

Amendments #1 to #7: I support ALL of the changes in ACEC designations.

Amendments 8, 9, 10: I support changing Class M areas to Class L in the Yuha Desert Management Area, the East Mesa Area and East Mojave Scenic Area.

6-1 [I oppose Amendment #11 to Class change at Dumont Dunes. ORVs do not need any more areas to rip-up and exclude non-vehicle oriented recreationists. ORVs drift into the Amargosa riparian area, and we do not need any more of that.

I oppose Amendment #12 to have an airport on Ivanpah Dry Lake and to change the Class from L to M. Create an airport for a casino because they do not want to drive cars. Too bad!

I support #16 and 17 changing Class L to Closed the Chuckwalla Dune Thicket ACEC vehicle access and Palen Dry Lake ACEC vehicle access.

I support #18 to prohibit grazing south of Interstate 10 on the Ford Dry Lake Allotment.

I am opposed to #19, to establish a new ephemeral allotment near Daggett. No more cattle or sheep allotments on the desert.

Mary Ann Henry
Mary Ann Henry

Response to Mary Ann Henry

Response to 6-1

The riparian habitat of the Amargosa River is within the Amargosa ACEC (#13) and begins approximately 4 miles north of the OHV area. Any problems will be resolved by signing, fencing, and ranger patrol.

See also response to 2-1.

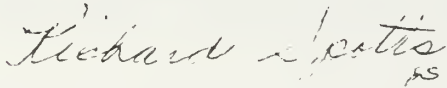
Defenders
OF WILDLIFE

2.

adoption of Amendments #8 and #9. Implementation of these Amendments would improve protection for the flat-tailed horned lizard. Defenders of Wildlife is greatly concerned at the continuing decline of this species and its habitats. Consequently, we are pleased that BLM is willing to take steps to increase its conservation. We hope these Amendments #8 and #9 will be adopted soon.

Thank you very much for considering our views.

Sincerely,

Handwritten signature of Richard Spotts in cursive script, with the initials 'RS' written below the name.

Richard Spotts
California Representative
Defenders of Wildlife

RS/js

cc: Interested parties

Mr. Gerald E. Hillier

- 2 -

July 25, 1989

DWP agrees with the Bureau of Land Management's (BLM) recommended preferred alternative to reject the adoption of Amendment 12 and further concurs with the cited rationale in support of this recommendation.

8-1 If Amendment 12 were to be adopted, DWP believes that the airport should be relocated at least 3/4 of a mile northwest of the current proposed location and the runway reoriented to parallel existing corridors and transmission lines. The relocation would help to minimize potential conflicts between low-level flying aircraft and the transmission lines.

Amendment 15 would delete contingent Corridor W from the Desert Plan. Contingent Corridor W, along with other utility planning corridors, was identified in the planning process for the Desert Plan by the Joint Utility Advisory Committee in the late 1970s "to establish a network of joint-use planning corridors capable of meeting projected utility needs to the year 2000." Further, this utility corridor element will serve as a guide for future decision making, beyond the year 2000.

8-2 The elimination of contingent Corridor W will further limit possible energy transmission routes through the California Desert for utility companies. Corridor BB and Corridor D will continue to be important transmission routes for DWP as well as other utility companies for future transmission projects, but the elimination of contingent Corridor W may contribute to the congestion of these two utility corridors. We feel that the time is approaching for BLM to reexamine the existing corridor network within the California Desert. We would be available to work with the BLM in this effort.

If you have any questions regarding our comments or would like to meet with our staff, please contact Mr. George P. Nino at (213) 481-4047.

Sincerely,



EDWARD KARAPETIAN
Manager of Environmental and
Governmental Affairs

c: Mr. Richard Fagan, Manager
Needles Resource Area
101 West Spikes Road
Needles, California 92363

Mr. George P. Nino

Response to Los Angeles Department of Water and Power

Response to 8-1

We are essentially in agreement concerning Amendment 12 and thank you for the additional information and suggestion for possible relocation of the airstrip. Due to other factors, we could not consider that alternative location.

Response to 8-2

Your comments on Proposed Amendment 15 are well taken. When Contingent Corridor W was identified, it was to officially recognize that location as a potential corridor. With that designation, it would still have been necessary to amend the CDCA Plan in order to activate the corridor.

Removing the designation will encourage utility companies to seek transmission routes outside the East Mojave Scenic Area. However, if it should become necessary to use this route in the future, an amendment to the CDCA Plan could be proposed.

88EA 009

RANDALL L. ABBOTT
DIRECTOR
David Price III
Assistant Director

2700 M Street
Suite 100
Bakersfield, CA 93300
(805) 861-2615

DEPARTMENT OF PLANNING AND DEVELOPMENT SERVICES

July 21, 1989

9

California Desert District
Bureau of Land Management
Attention Plan Amendments
1695 Spruce Street
Riverside, CA 92507

RECEIVED
CALIFORNIA DESERT DISTRICT
BUREAU OF LAND MANAGEMENT
RIVERSIDE, CA
JUL 29 PM 2:44

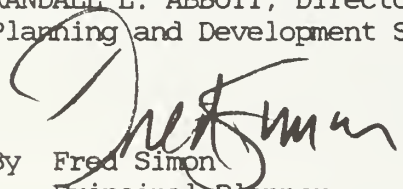
Re: Environmental Assessment, Proposed 1988 Amendments to the California Desert Conservation Area Plan

Ladies and Gentlemen:

Thank you for the opportunity to comment upon the above-noted project. One of the proposed Areas of Critical Environmental Concern (ACEC) is located in Kern County: the Red Rock Canyon ACEC. We concur in the analysis presented and have no further comments at this time.

Very truly yours,

RANDALL L. ABBOTT, Director
Planning and Development Services



By Fred Simon
Principal Planner

slb

Response to U. S. Department of the Air Force

Response to 10-1

The Bureau recognizes that military aircraft training and testing activities in the California Desert are an important part of the national defense system of the United States. Overflights of military aircraft at low levels over the proposed ACECs are expected. ACEC designation will not affect this activity.

Response to Kerncrest Chapter, National Audubon Society

Response to 11-1

The Kramer Hills ACEC is located in an area which has been proposed as Category I desert tortoise habitat. The tortoise was given an emergency listing as an endangered species on August 4, 1989. It will be protected as required by the Endangered Species Act. Deletion of the ACEC designation will not affect management of the tortoise in this or any other area. A mine operator will be subject to the requirements of the Endangered Species Act for operations on public lands.

A plan of operations has been filed for heap leaching within the area, but so far there has been no activity on public lands. ACEC status would not affect the process, if mining should occur.

See also responses to 14-4 and 28-7.

12-3 Valley National Monument. Within the Monument the Amargosa River supports a significant population of Amargosa River Pupfish (Cyprinodon nevadensis amargosae). We believe there is a strong probability that OHV use will spill over into Area 4 and degrade the Amargosa River within the Dumont Dunes area, and those impacts may extend into the Monument and adversely impact the habitat of the pupfish through degraded water quality. We assume that the only effective method of keeping OHV use out of this sensitive area is fencing. Are there any data on the occurrence of unlimited OHV use outside the boundary of the existing open area?

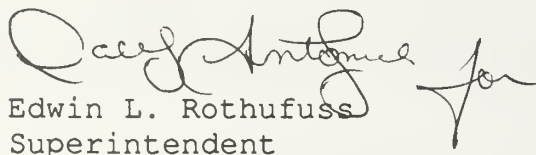
12-4 It is difficult to comprehend that impacts to archaeological resources over such a large area can be adequately mitigated. To do so would require a complete survey of the entire area proposed to be open to unlimited OHV use. The proximity of Salt Creek, the Amargosa River and Saratoga Spring causes us to believe there would be a high probability that significant archaeological resources exist throughout the area.

12-5 The environmental assessment does not address potential impacts to the two species of dune beetles known to inhabit the area. Has additional study of their distribution been made since the work of Andrews and Hardy in 1976? Expansion of OHV use in the area seems questionable if these two beetles are endemic and are already experiencing impacts due to the existing OHV use. Perhaps additional work on the significance of these two species of beetles is in order before the environmental assessment can be completed.

12-6 We believe some OHV use in the Dumont area "spills" over into Death Valley National Monument, especially in the Saratoga Spring and Ibex areas. We would like to work with the BLM staff in the Barstow Resource Area Office in controlling any such illegal use through a public education program using signs and patrolling rangers.

Thank you for the opportunity to comment on the environmental assessment for the 1988 CDCA Plan Amendments. If you have any questions please contact us.

Sincerely,


Edwin L. Rothufuss
Superintendent

Response to National Park Service, Death Valley National Monument

Response to 12-1

It is not anticipated that enlargement of the OHV area will adversely affect Death Valley National Monument. The draft Dumont Dunes Management Plan includes education of the OHV public concerning street legal use of vehicles within the Monument. The plan also calls for additional BLM and volunteer personnel to provide visitor services.

Response to 12-2

The only dust generated in the area is along the access road. Dust abatement measures proposed in the Management Plan should prevent any increase in dust.

Response to 12-3

See responses to 5a-1, 6-1, and 13-1.

Response to 12-4

Areas 2 and 3 are mostly devoid of cultural sites. However, there is a small area which may contain cultural resources. It will be surveyed along with the Tonopah and Tidewater Railroad grade and its associated town sites (Sperry, Dumont, and Valjean). The survey will determine the area's eligibility for inclusion in the National Register of Historic Places. A mitigation package will be prepared for eligible sites, followed by consultation with the State Historic Preservation Officer, as required by Section 106 of the National Historic Preservation Act. Mitigation will be accomplished through data recovery.

See also response to 5a-1.

Response to 12-5

The Bureau's legal mandate is to conserve listed threatened or endangered species. No such species exists in the Dumont Dunes area. References to unclassified species of beetles (Hardy and Andrews, 1976) are preliminary and incomplete. The lone report did not address other nearby dune areas (only six of 40 in California were visited) nor was sampling intensity stated. If these beetles do constitute endangered species, the California Department of Fish and Game and the U.S. Fish and Wildlife Service are the appropriate agencies to initiate a formal listing process. The BLM will cooperate with such actions by allowing research to be conducted. In the interim, other nearby dune systems are protected through either closure to OHVs (Kelso and Ibex) or OHV use on limited or existing trails (Devil's Playground and Cadiz).

Response to Death Valley National Monument (cont.)

Response to 12-6

Use of existing routes outside the OHV area is legal. If a specific problem is identified, signing and fencing of the Monument boundary and patrols by BLM and National Park Service (NPS) rangers will be considered. A cooperative agreement between BLM and the NPS could be prepared for handling any problems which may arise.

88EA013



30 JUL 2 1989
CALIFORNIA DISTRICT

United States Department of the Interior

FISH AND WILDLIFE SERVICE
LAGUNA NIGUEL FIELD OFFICE
24000 Avila Road
Laguna Niguel, California 92656

17/27

In Reply Refer To:
FWS/LNFO (1-6-89-TA-944)

13 July 26, 1989

MEMORANDUM

To: District Manager, California Desert District, Bureau of Land Management, Riverside, California

From: Acting Field Supervisor

Subject: Proposed 1988 Plan Amendments to the California Desert Conservation Area, California

The Fish and Wildlife Service (Service) has reviewed the environmental assessment for the proposed 1988 Plan Amendments to the California Desert Conservation Area. The proposed amendments include the creation of three new Areas of Critical Environmental Concern (ACEC), deletion of three existing ACECs, one boundary adjustment to an ACEC, five multiple use class changes, deletion of portions of three utility corridors, three changes in motorized vehicle access, and two changes in the Livestock Grazing Element. Under the Bureau of Land Management's (Bureau) preferred alternative, 17 amendments would be accepted and two would be rejected.

The Service offers the following comments on those amendments which we believe have potential the affect fish and wildlife resources:

Amendment 2. New ACEC Adjacent to Red Rock Canyon. The Service concurs with the Bureau's assessment that this proposed amendment will provide additional protection to nesting and foraging raptors and to numerous Federal candidate species, such as the desert tortoise (Xerobates agassizii), Mohave ground squirrel (Spermophilus mohavensis), and Red Rock tarweed (Hemizonia arida). Therefore, the Service supports the adoption of this amendment.

Amendment 3. New ACEC at Dedeckera Canyon. ACEC designation in this area would lead to increased protection for desert bighorn sheep (Ovis canadensis nelsoni) and the Federal candidate species, July gold (Dedeckera eurekaensis), as well as other plant

District Manager

2

species endemic to the Death Valley region. The Service supports adoption of this amendment.

Amendment 8. Change Class "M" to Class "L" in the Yuha Desert Management Area. This amendment has been proposed in response to deteriorating habitat values for the flat-tailed horned lizard (Phrynosoma mcallii), which is a category 1 candidate for listing under the Federal Endangered Species Act (Federal Register 54:559; January 6, 1989). The change to Class L would permit the Bureau to place greater environmental constraints on mining, off-road vehicle use, and other activities which could occur in this region and allow for management actions which would benefit the conservation of the flat-tailed horned lizard. For these reasons, the Service supports the adoption of Amendment 8.

Amendment 9. Change Class "M" to Class "L" in the East Mesa Area. The Service supports adoption of this measure for the same reasons advanced for Amendment 8.

Amendment 10. Change Class "M" Areas to Class "L" in East Mojave National Scenic Area. This proposed amendment would increase the Bureau's ability to manage wildlife on approximately 120,000 acres within the East Mojave National Scenic Area. Included among the resources found in this area are numerous species of raptors, desert tortoises, bighorn sheep, mule deer (Odocoileus hemionus), and four candidate species of plants. Alternative B would exclude the Mescal Range area from the land use classification change and result in fragmentation of wildlife habitat management actions. Therefore, the Service recommends that Alternative A, which would involve the land use change on the entire 120,000 acre area, be adopted by the Bureau.

Amendment 11. Change Class "M" to Class "I" and Vehicle Access from "Limited" to "Open" in Areas Adjacent to Dumont Dune Open Area. Alternatives A, B, and C would add varying amounts of land to the Dumont Dunes Open Area in an effort to "acknowledge historic use patterns and ... provide manageable boundaries for the open area," as stated on page 4-12 of the environmental assessment. Alternative A would set a Wilderness Study Area as a boundary for off-road vehicle use, while Alternatives B and C would allow use of areas near and at the Salt Creek ACEC and the Amargosa River, respectively.

13-1

The environmental assessment identifies several wildlife species of concern in the area of the proposed expansions. Two Bureau sensitive fish species, the Amargosa pupfish (Cyprinodon nevadensis amargosae) and the Amargosa speckled dace (Rhinichthys osculus nevadensis), are known to occur upstream from the Open Area, while the Dumont Dunes support two new, unclassified, and potentially endemic species of beetles, Eucilinus sp. and Trigonoscuta sp. Despite the fact that these wildlife

District Manager

3

13-2 resources occur within or near the proposed expansion areas, there is no discussion of the potential impacts of Alternatives A and B in the Environmental Consequences section of the assessment. Furthermore, the environmental assessment does not contain any information on means by which impacts to Wilderness Study Area 222 would be prevented. Although the Service is not mandated to evaluate the impacts of projects to wilderness areas per se, the management of these areas in a manner that excludes many activities that are detrimental to wildlife can provide numerous benefits to many species. Therefore, we are concerned about the resulting impacts should off-road activity be permitted to the borders of a Wilderness Study Area. The Service believes that potential adverse impacts to wildlife habitat within Wilderness Study Areas 219, 220, and 221 can also result from adoption of this amendment. Although these areas have been recommended as nonsuitable for wilderness, they are currently being managed under the Interim Management Policy and Guidelines for Lands under Wilderness Review to retain their wilderness values.

13-3 The rationale given for expanding this particular Open Area may create or perpetuate a management strategy that results in a spiraling downward trend of loss of habitat. Legalization of the unauthorized activity that has had an impact on wildlife resources will not solve this problem. Although this amendment may not increase the overall use of the Open Area, it will legitimize currently occurring dispersed recreation. A potential outcome of this type of management would be continued spread of the illegal activities to areas outside of the proposed boundaries.

13-4 Finally, the environmental assessment should provide a more thorough analysis of the impacts that could occur to the two endemic beetles and the native fish species and of means that could be used to avoid these impacts. With particular regard to the beetles, permitting any actions which could result in the extirpation of species prior to their scientific descriptions indicates a lack of sensitivity to these natural resource values and does little towards contributing towards a true multiple use strategy that maintains a balanced approach to resource management.

Amendment 12. Change a Portion of Ivanpah Dry Lake from Class "L" to Class "M". As the environmental assessment indicates, Ivanpah Dry Lake is surrounded by Category 1 desert tortoise habitat and development of an airport and its ancillary features would very likely lead to degradation of this habitat. Therefore, the Service concurs with the Bureau's recommendation that this amendment be rejected.

District Manager

4

13-5

Amendment 13. Delete portion of Utility Corridor M. The Environmental Consequences section of the environmental assessment indicates that adoption of this amendment may have a minor impact on the Yuma clapper rail (Rallus longirostris yumanensis), a federally listed endangered species. We are unable to determine from the document how the rail might be affected, as the proposed amendment is to remove the utility corridor from potential rail habitat. However, Section 7 of the Federal Endangered Species Act requires that all Federal agencies consult with the Service, either formally or informally, should any action undertaken by that agency have the potential to affect a listed species. Therefore, we recommend that the Bureau contact the Service with regard to this amendment to ensure compliance with the Endangered Species Act.

Amendment 14. Delete One-mile Wide and Nine-mile Long Segment of Utility Corridor E. The Service recommends the adoption of this amendment, which would remove the potential of utility construction within 5,760 acres of Category 1 tortoise habitat in the East Mojave National Scenic Area.

Amendment 15. Eliminate "Contingent" Corridor W. The Service also recommends adoption of this amendment because of benefits to the desert tortoise within the East Mojave National Scenic Area.

Amendment 16. Change Motorized Vehicle Access from "Limited" to "Closed" in Chuckwalla Dune Thicket ACEC. The Chuckwalla Dune Thicket is dominated by large palo verdes (Cercidium floridum) and ironwoods (Olneya tesota) and provides important habitat for numerous species of wildlife, including many migratory birds. Eliminating vehicle access through this area will benefit these species. Therefore, the Service concurs with the Bureau's recommendation that this amendment should be adopted.

Amendment 18. Prohibit Grazing South of Interstate 10 in the Ford Dry Lake Allotment. The Service recommends adoption of this amendment which will enhance opportunities to manage bighorn sheep in the Ford Dry Lake area.

Amendment 19. New Ephemeral Grazing Allotment near Daggett. Adoption of this amendment would adversely affect bighorn sheep through potential disease transmission and competition for forage, while the desert tortoise would be affected by competition for the annual plant species upon which it feeds. The Service recommends against adoption of this amendment for these reasons.

In conclusion, the Service commends the Bureau for presenting a set of amendments which, on the whole, will enhance wildlife values in the California desert. We support the Bureau's recommendations on those amendments which could affect wildlife with the exception of Amendment 11, the Dumont Dunes proposal.

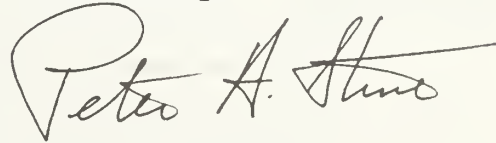
District Manager

5

Additionally, we urge the Bureau to fully consider its responsibilities under Section 7 of the Endangered Species Act which requires all Federal agencies to consult with the Service if a federally funded, permitted, licensed, or constructed project could affect a listed species. Given the current situation with the desert tortoise, we recommend that the Bureau fully consider the tortoise in its planning activities in the event this species is listed in the near future.

If you have any questions concerning these comments, please contact Ray Bransfield of my staff at FTS 796-4270 or (714) 643-4270.

Sincerely,

A handwritten signature in cursive script that reads "Peter A. Stone". The signature is written in dark ink and is positioned above the typed name.

for Brooks Harper
Acting Field Supervisor

Response to U. S. Fish and Response to U. S. Fish and Wildlife Service

Response to 13-1

The Amargosa River is an intermittent water way through the Dumont Dunes OHV area. This stretch of the "river" does not lend itself to effective management of fish species, including the Amargosa pupfish and the Amargosa speckled dace. Both of these species are being managed in the Amargosa Canyon Natural Area/ACEC.

See also responses to 6-1 and 12-5.

Response to 13-2

The final Dumont Dunes Management Plan will provide procedures for signing the boundary of the adjacent WSA (four signs per mile), trail crossings, and designated routes. The WSA will continue to be monitored according to the Interim Wilderness Management Policy. One BLM ranger currently provides law enforcement in the area, and the Dumont Dunes Management Plan calls for an additional Visitor Services Ranger to work at Dumont and Rasor. Volunteers will be organized into a dune patrol, distributing information on rules, regulations, and the proper use of public lands. A brochure will be distributed providing information on the use and boundary of the area, and the sensitivities of the WSA. If signing of the boundary and education is not effective in preventing unauthorized activity in the WSA, the next management action will be fencing.

Response to 13-3

The rationale for expanding the OHV area is based on use which has occurred historically, as well as the recognition of the unmanageability of an ambiguous boundary. Due to the shifting sands, the boundary was unestablishable; thus, unintentional unauthorized activity has occurred historically. Establishing a definite boundary will leave no room for misinterpretation and will provide the tool for proper management. The outcome of this management decision is not the spread of illegal activities, but the recognition of historical use and the establishment of a manageable boundary.

See also response to 5a-1.

Response to 13-4

See responses to 12-5 and 13-1.

Response to 13-5

The Bureau regrets that there was a typographical error in this section. We believe that adoption of the amendment will, in fact, have a minor positive effect on the Yuma Clapper Rail (Rallus longirostris yumanensis) through removing the possibility of impacts along that portion of Corridor M which is proposed for deletion.

Rec'd July 28
1:17 PM

P.O. Box 307
Boron, CA 93596
July 27, 1989

California Desert District, BLM
ATTN: Plan Amendments
1695 Spruce Street
Riverside, CA 92507

14

COMMENTS ON THE PROPOSED 1988 AMENDMENTS FOR THE COCA PLAN

- 14-1 Amendment Two
But in proposing a new ACEC for Red Rock Canyon do you continue to allow restricted OHV use in Nightmare Gulch? The tortoises don't know when the raptors are nesting! The OHV route should be eliminated. To make this an ACEC and leave the routes open is an obvious submission to the pressure of the Gear Grinders.
- 14-2 Amendment Three
Again, the Gear Grinders will keep their trail through DeDeckera Canyon. This trail is very similar to the Nightmare Gulch trail and only serves the purpose of getting 4WDs from point A to point B. Any and all ACECs should be closed to vehicle use!
- 14-3 Amendment Five
I suspect that with the proposed Fort Irwin Expansion you have little choice but to delete the Camp Irwin Boundary expansion....
- 14-4 Amendment Six
But what are your plans for class designation once you delete the Kramer Hills ACEC? Please advise if this will be made a Class L area to protect Category 2 tortoise populations.
- 14-5 Amendment Seven
How will you class the Dale Lake area once you have deleted the ACEC?
- 14-6 Amendment Nine
How can you justify windpowered generating facilities on Class L lands? The acres and acres of land surface disturbed in the installation and service of windmachines is contradictory to Class L designation. Furthermore steel trees are a big "0" in visual quality!
- 14-7 Amendment Ten
But you propose to authorize 1900 cattle yearlong in the "Mojave National Scenic Area". Do cattle understand the constraints of limited use? Must BLM make bighorn sheep compete with domestic animals for forage?...and tortoises? To allow cattle grazing in the MNNSA is a mockery of good management.
- Amendment Twelve
If Category 1 desert tortoise habitat was a primary reason for the original Class L designation, then with the state and (emergency) federal listing, shouldn't this be a separate issue?...separated from livestock grazing and recreational activities?
- Amendment Sixteen
I support the Chuckwalla Dune Thicket ACEC
- Amendment Eighteen
There should be no grazing (not even day use) south of I-10. If domestic animals are infecting mountain sheep, then why do you believe there would be no transmittal of pathogens on a day use basis? I support Alt. B
- Amendment Nineteen
Here again bighorn sheep will be impacted. I support Alternative C

Sincerely,
Elizabeth Forgey
Mrs. Warren W. Forgey

Response to Elizabeth Forgey

Response to 14-1

Vehicle use is already restricted in the proposed ACEC under a memorandum of understanding (MOU) between the BLM and the California Department of Parks and Recreation. The area is managed by State Parks as part of Red Rock Canyon State Park, except that BLM manages mining and grazing. The Scenic Cliffs/Nightmare Gulch portion of the area is closed to vehicles from February 1 to July 1 to protect sensitive resources. From July 1 to January 31, vehicle use is allowed between the 16th day and the end of each month.

Response to 14-2

The Desert District has recommended that the 4-WD route between Eureka Valley and Saline Valley should remain open. This decision was in response to a large number of requests from the public during review of the CDCA Plan and during later route designation. The ultimate decision will be made by Congress when it takes action on wilderness designation.

ACECs are not closed to vehicle access, although routes may be closed when necessary.

Response to 14-3

The reason for deletion of the Fort Irwin ACEC was that the portions of the ACEC within the jurisdiction of the BLM contain no known cultural resources. There is no relationship to the proposed expansion of Fort Irwin.

Response to 14-4

The Kramer Hills ACEC area will remain in the same multiple-use class as the surrounding area, Class M, or moderate use. The entire area is within the Consolidation Zone of the Land Tenure Adjustment Project (LTA). When the LTA Record of Decision is signed, Class M land within the Consolidation Zone will become Class L.

Response to 14-5

The Dale Lake ACEC area will continue to be designated Class M, the same as the surrounding lands.

Response to 14-6

The Multiple-Use Class Guidelines of the CDCA Plan specify that wind-generation power plants may be allowed in Class L areas. The Class L designation also highlights the presence of sensitive resources and insures that these areas will receive greater management attention. Proposed actions are subject to environmental review according to the requirements of the National Environmental Policy Act.

Response to Elizabeth Forgey (cont.)

Response to 14-7

Livestock grazing is compatible with limited use (Class L) in the East Mojave National Scenic Area. Cattle numbers and their use of forage are monitored regularly. The majority of the scenic area has been identified as being in "good" condition; the remaining areas are being managed to improve their condition.

The CDCA Plan allocated forage to bighorn sheep before allocating any to cattle, in order to reduce the chances of competition between the two. Competition for forage between bighorn and cattle is usually not an issue in desert ranges, where water is often the limiting factor for sheep. We are currently trying to ascertain whether or not there is competition of any kind between cattle and tortoises. We will act to minimize these conflicts wherever possible. There are many resources in the EMNSA; finding equitable solutions for balancing them is a goal of the Bureau's multiple use mandate from Congress.

JOHN R. SWANSON
P. O. Box 6554
Minneapolis, Minn. 55406

88EA 015

15

July 24, 1989.

Bureau of Land Management
1695 Spruce Street
Riverside, California 92507.

Dear Sirs;

Please accept my comments, as follows, concerning the
Proposed 1988 Plan Amendments.

- ↳ Support the changes in ACEC designations, including:
Rockman Mountains, Red Rock Canyon, DeDecker Canyon area and
Coyote Mountains.
- ↳ Do, urge that ACEC designations remain at ~~Camp~~ Dr. Dr. Dr. Dr., Kramer Hill
and DeDecker.
- ↳ Oppose ORV use at Summit 5 area.
- ↳ Oppose airport on Ivanpah Day Lake.
- ↳ Oppose motor use in the Palen Day Lake and Chuckwalla Dune Thicket
areas.
- ↳ Oppose grazing in the Sand Day Lake and Desert areas.

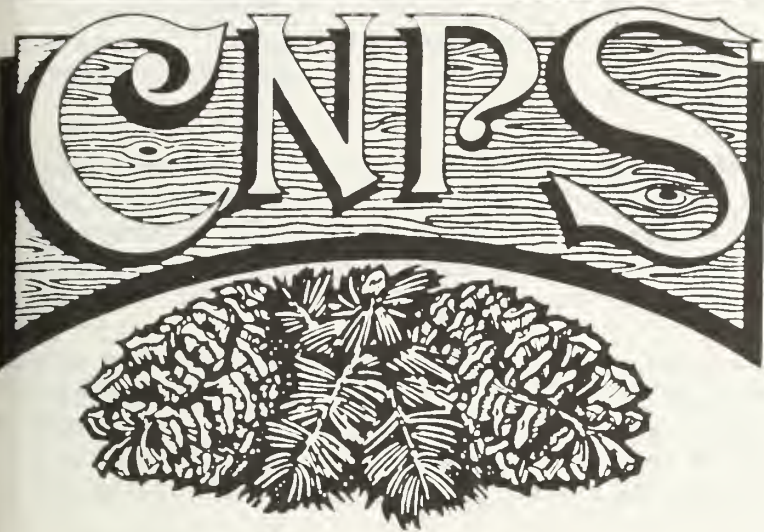
Sincerely,
John R. Swanson.

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CALIF. DESERT DISTRICT
RIVERSIDE, CA

(88 EA 016)

BRISTLECONE • CHAPTER

DEDICATED TO THE PRESERVATION
OF THE CALIFORNIA NATIVE FLORA



P.O. Box 330
Lone Pine CA, 93545
July 26, 1989
In re: 1600
(C-060.23)

California Desert District, BLM
ATTN: Plan Amendments
1695 Spruce Street
Riverside CA, 92507

16

Gentlemen:

The following is in regard to your Environmental Assessment of the Proposed 1988 Amendments to the California Desert Conservation Area Plan.

We are most pleased to be able to say that we agree with each of your preferred alternatives for the 19 proposed amendments.

Thank you for providing us with the opportunity to comment upon the proposed amendments.

Yours very truly,
Vincent Yoder
Vincent Yoder, Conservatyion Chair
Bristlecone Chapter
California Native Plant Society

RECEIVED
BUREAU OF LAND MANAGEMENT
1989 JUL 28 PM 2:46
BLM DESERT DISTRICT
RIVERSIDE, CA

(SBEA 017)

CALIFORNIA WOOL GROWERS ASSOCIATION

RECEIVED
BUREAU OF LAND MANAGEMENT

1988 JUL 31 10:28

CALIF. DESERT DISTRICT
RIVERSIDE, CA

July 27, 1989

Gerald E. Hillier, District Manager
California Desert District
Bureau of Land Management
ATTN: Plan Amendments
1695 Spruce Street
Riverside, CA 92507

17

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Dear Mr. Hillier:

The California Wool Growers Association appreciates the opportunity to submit comments on the 1988 proposed amendments to the California Desert Conservation Area Plan. The plan, and the continuing amendment process, has been an ongoing and efficient mechanism to manage the numerous resources of the desert for the groups who utilize those vast renewable resources for recreation and their livelihood. CWGA continues to support the Multiple use management of public lands.

CWGA would like to comment on proposed amendments number 18 and 19. The BLM decisions to accept amendment 18 and reject amendment 19 are based in part on the interaction of domestic livestock and bighorn sheep. It is therefore appropriate to address that issue first.

The bighorn fatality in the Warner Mountains is cited as one of the principal reasons for acceptance of alternative A (amendment 18) and acceptance of alternative C (Amendment 19). Dr. William J. Foreyt is cited as the principle reference to that event. There have been other works published on that event including a BLM Technical Review Team's report which followed their meetings the following summer. There are several important facts that were brought out in those TRT meetings which are not brought forth in the literature cited in the plan amendment.

First: It was unclear, at best, as to whether or not there had ever been contact between domestic livestock and the bighorn sheep.

17-1



Don Torell
President
Ukiah California

Joe Esnoz
Vice President
Lost Hills California

Jay B Wilson
Executive Vice President
Sacramento California

Unifying the Voice of the California Sheep Industry Since 1860
1221 H Street, Suite 101 • Sacramento, California 95814-1910
(916) 444-8122

Page 2, Plan Ammendments
July 27, 1989

7-1 Second: The weather conditions that winter were severe. The snow was abnormally deep combined with extremely cold temperatures over an extended period of time. The snow depth limited the mobility of the bighorn and covered much of the available forage. These factors alone placed a great deal of stress on the animals.

Third: After the Fish and Game Department realized that a serious problem existed in the Warner Mountain bighorn sheep population, they decided to capture the surviving animals by helicopter and place them on feed. The roundup and change from their familiar surroundings placed additional stress to the surviving bighorn.

AMENDMENT 18

CWGA would like to oppose the acceptance of alternative A (Adopt amendment) and support adoption of Alternative B (Reject Amendment).

AMENDMENT 19

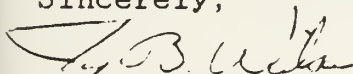
CWGA supports adoption of alternative A. The potential permittee has demonstrated a willingness to resolve any potential conflicts in the development of an allotment management plan.

-2 The plan identifies a potential impact of grazing on the Sand Lananthus and the Monkey Flower. It is commonly accepted, and so stated in the plan amendment, that these plants are not very palatable to domestic sheep. Sheep, by nature, are very selective in their grazing behavior, having the ability to selectively remove only the part of any plant that they find desirable. If 200 lbs. of forage are required per acre on this ephemeral allotment, and the customary grazing restrictions are followed in the forthcoming allotment management plan, there would be an abundance of palatable feed available and subsequently, no reason for sheep to disturb the aforementioned plants which they find undesirable. It can not be expected that sheep would utilize this vegetation if more palatable vegetation is available.

It is premature and erroneous to base this decision on the possible conflict between bighorn sheep and domestic sheep or the presence of a plant which domestic sheep find unpalatable.

Once again, we appreciate this opportunity to comment.

Sincerely,



Jay B. Wilson
Executive Vice President

Response to California Wool Growers Association

Response to 17-1

The California Department of Fish and Game maintains that both the Warner Mountains and Lava Beds National Monument bighorn sheep die-offs were preceded by contact with domestic sheep. The causative organism in both cases was found to be Pasturella sp. bacteria. Regardless of the Warner Mountains case, potential impact to wild sheep from domestic sheep is also documented by Sandoval (1988), in addition to the three references given in the environmental assessment. In brief, the California Wool Growers Association provides no new information to support rejection of Alternative A (adopt amendment).

Response to 17-2

The conflict between bighorn sheep and domestic sheep is documented and must be considered as an impact. Potential impact to sensitive plant species from grazing or, secondarily, from trampling cannot be ignored.

1/ CA Dept. Fish and Game, 1988. Summary regarding bighorn sheep, infectious diseases, and livestock. State of California, the Resources Agency, Dept of Fish and Game (3pp.)

2/ Sandoval,A.V., 1988. Bighorn sheep die-off following association with domestic sheep: case history. Desert Bighorn Council Transactions 32: 36-38.

88EA 018

Kerncrest Chapter National Audubon Society

P.O. Box 984
Ridgecrest, CA 93556

RECEIVED

1993 JUL 31 PM 3:50

CALIF. DESERT DISTRICT

18

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July 27, 1989

California Desert District
Bureau of Land Management
1695 Spruce St.
Riverside CA 92507

Attn: 1988 Plan Amendments

Dear Mr. Hillier,

This is an addition to our July 25 comments.

18-1

Concerning Amendment #6 Kramer Hills ACEC deletion - would it be possible to adjust the ACEC boundaries to exclude a possible gold mine rather than deleting the entire ACEC? We would like to work with you on a mutually agreeable compromise if you delay action on this Amendment.

Thank you for your consideration.

Sincerely,

Donald W. Moore

Donald W. Moore, President

Response to Kerncrest Chapter, National Audubon Society

Response to 18-1

Deletion of the Kramer Hills ACEC is not related to the mining operation in the area. The subject gold mine is proposed for privately-owned land that is not under BLM jurisdiction. The ACEC deletion is based on the finding that the area does not contain the significant cultural resources for which it was originally designated.

(88EA 019)



United States Department of the Interior



1989 JUL 31 PM 3:51
BUREAU OF RECLAMATION
LOWER COLORADO REGIONAL OFFICE
P.O. BOX 427
BOULDER CITY, NEVADA 89005

IN REPLY
REFER TO

LC-159
ENV-6.000

JUL 27 1989

19

Memorandum

To: Mr. Gerald E. Hillier, District Manager, California Desert District, Bureau of Land Management, 1695 Spruce Street, Riverside CA 92507
Attention: Plan Amendments

From: Regional Environmental Officer

Subject: Review of Environmental Assessment for the Proposed 1988 Plan Amendments to the California Desert Conservation Area Plan of 1980 (Environmental Assessment)

We have reviewed the subject plan as requested. The Bureau of Reclamation presently has a ground water recharge test project in the East Mesa area along a section of the abandoned Coachella Canal. Water is released into the abandoned canal and allowed to infiltrate into the underlying ground water aquifer.

19-1

We have been contemplating the use of spreading basins outside the canal prism as part of our recharge project. Amendment Nine in the plan recommends adopting the concept of changing Class "M" lands to Class "L" lands. We would like to know what effect this change in classification could have on our project.

We would appreciate a response to our memorandum at your earliest convenience.

William E. Rinne

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Response to U.S. Bureau of Reclamation, Lower Colorado Regional Office

Response to 19-1

BLM sent a memo to the Regional Environmental Officer indicating that the MUC change would not affect the proposed recharge basins and that an environmental assessment would be required. The memo described in detail the reasons for the change and noted the presence of several ACECs and a Habitat Management Area. Also described were several of the sensitive wildlife species found at the East Mesa. The memo concluded that "future environmental assessments for recharge projects should consider all reasonable alternatives, including pumping rather than creating spreading basins."

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1988 AUG -7 PM 2
 Bureau of Land Management
 DISTRICT
 California Desert Office
 1695 Spruce Street
 Riverside, CA. 92507

20

Dear Mr. Manager,

I am writing to you concerning the proposed amendments to the California Desert PLAN especially the motorized vehicle access part. I am opposed to any significant changes to the original well thought out plan! Senator Cronston & Mel Lone have been trying for years to close the Desert down to only a few select environmentalists and have failed every year. They do not understand the needs, wants & desires of the California people. They are being influenced by the money being put into their campaign by the select few who want to close the desert off to only their type.

Leave our desert AS is & retain the original Plan that was well thought out! Stop trying to mess up a good thing!

Thank you!

Sincerely,
 Emery Henrich
 14300 Dover Drive
 MESA, CA. 93501

DEPARTMENT OF PARKS AND RECREATION

Southern Region Headquarters
1333 Camino Del Rio South, Suite 200
San Diego, California 92108
(619) 237-7961



August 11, 1989

21

Ms. Irene Rice
California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, California 92507

Dear Ms. Rice:

21-1

Thank you for the opportunity to review the Environmental Assessment prepared for your proposed 1988 Plan Amendments to the California Desert Conservation Area Plan of 1980. The California Department of Parks and Recreation supports the designation of lands adjacent to Red Rock Canyon State Park as an Area of Critical Environmental Concern (ACEC). As noted in your proposal, this amendment would provide additional, and much needed, protection for wildlife, vegetation, rare and endangered species of plants and animals, archeological resources and paleontological sites on lands currently co-managed by our two agencies. Our Department continues to be interested in acquiring this land as an addition to Red Rock Canyon State Park, and your proposal for increased protection of these resources is consistent with our management goals for the area.

Sincerely,


Kenneth E. Jones, Regional Director
Southern Region

cc: R. Rayburn
G. McDaniel
J. Geary

Response to CA Department of Parks and Recreation, San Diego

Response to 21-1

Your comment is noted.

REC'D
AUG 15
CALIF. DESERT DISTRICT
RIVERSIDE, CALIF.



**Gear Grinders
Four Wheel Drive Club**
P.O. Box 32
RIDGECREST, CALIF. 93555

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22

Gerald E. Hillier, District Manager
California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, California 92507

RE: 1988 PROPOSED PLAN AMENDMENTS

Dear Mr. Hillier,

We, the members of the Gear Grinders 4WD Club of Ridgecrest, would like to submit the following comments to the 1988 Proposed Amendments to the California Desert Conservation Area Plan of 1980. We will specifically be addressing Amendments #2 - Nightmare Gulch/Blackrock Canyon and #3 - Dedeckera Canyon. The Gear Grinders have "Adopt-A-Trail" agreements with the BLM for the Eureka/Saline Corridor and with both the BLM and the California Department of Parks and Recreation, High Desert Area (CDPR) for Nightmare Gulch/Blackrock Canyon. These agreements provide for the maintenance of existing 4WD trails.

First, however; if not for the announcement in the paper concerning these proposed amendments, the Gear Grinders would not have known of these proposed changes which could potentially affect our recreation in the two areas, as well as the existing "Adopt-A-Trail" agreements. We feel it should be mandatory that all parties to an Adopt-A-Trail agreement be notified of any potential management changes to an area covered by a cooperative management agreement.

CHAPTER 3, AFFECTED ENVIRONMENT
NIGHTMARE GULCH/BLACKROCK CANYON

22-1

We feel this proposal adds yet another layer of unnecessary protection to this area. Protection is already afforded the area by the 5 month closure to ALL entry, during the raptors nesting season, as well as the 1/2 month vehicle closure during the months of July thru January. Also, since the area is already managed by both the CDPR and the BLM, an ACEC designation is unnecessary and redundant.

The desert tortoise is protected in this area by the five month raptor closure, as the tortoise is most active from March through June - when it returns to it's burrows to hibernate through February (according to the BLM's Toroise literature).

The Statement is made that ". . . the Mojave ground squirrel may occur in portions of the affected area." The actual presence of the Mojave ground squirrel in the "affected area" has not been substantiated and so we assert that this is not a valid reason for establishing an ACEC.

Therefore, we strongly urge the BLM to REJECT Amentment 2, An ACEC for land adjacent to Red Rock Canyon.

AMENDMENT THREE
NEW ACEC AT DEDECKERA CANYON

22-3

First, most people will ask, "Where is Dedeckera Canyon?" We, too, had to look at the map to decide where it was located, and our immediate response was "Oh, the Eureka/Saline Corridor." We hope this is just the name of the "canyon" and not an attempt to change the historic name of the Eureka/Saline Corridor.

CHAPTER 2, ALTERNATIVES

We recommend that the current management be maintained, and the added title of ACEC is not necessary.

22-4

On Page 2-2, under "Proponent's Reason for Submission", reasons stated for the establishment of the new ACEC include: "There is evidence that they should be protected from degradation", yet nowhere in the text is there any evidence given substantiating the "degradation" to archaeological sites.

Also, "Camping in the canyon could be hazardous to both the natural resources and to the campers, as flash floods may sweep down the canyon with great force." First, camping in the canyon would be infrequent, at best, because of the camping available at the Eureka Dunes and the hot springs in Saline Valley. The Gear Grinders have camped twice at the north of the "narrows" while doing trail maintenance, however, this is not the norm. The hazard of flash floods to campers in the canyon is an emotional statement that is completely invalid. Any canyon in the desert is a hazard in those conditions, and common sense should protect most visitors. However, the statement does show that flash floods are the source of more damage to natural resources than would be any campers. Indeed, any evidence of campers would be removed.

CHAPTER 3, AFFECTED ENVIRONMENT

22-5

We agree that "the dolomite cliffs of the Last Chance Range provide nesting and roosting habitat for raptors as well as habitat for bighorn sheep." This is not justification, however, for an ACEC. (Page 3-3)

We agree "the cliffs of the Last Chance Range also provide habitat for many plant species endemic to the Death Valley Region." However, neither is this a justification for an ACEC designation.

A cultural resource inventory "may" need to be done, but an ACEC designation solely for the purpose of obtaining more funds is not appropriate. At the Desert Advisory Council Meeting in Riverside this past June, a statement was made to the effect that an ACEC designation could be used to obtain funding for a cultural resource inventory. We do not feel that an ACEC designation is the appropriate vehicle for obtaining funds to do a cultural resource inventory, and that is is not a valid land management tatic.

1988 Proposed Amendments, Page 2
Gear Grinders 4WD Club

As has already been noted, off road vehicle use in the area is restricted by an MOU between the BLM and the State Park to certain portions of the year, which minimizes the impact, if any, to wildlife and vegetation. The Nightmare Gulch vehicle trail itself, being situated at the bottom of a steep-walled canyon, does not permit vehicles to stray off the route and access to cultural artifacts, such as the geoglyph on the rim of Nightmare Gulch. Access to the geoglyph is greatly restricted by the same steep walls of the gulch, which makes hiking to the geoglyph hazardous.

Mining is not a factor within the proposed ACEC. After checking the records of the nine mining claims within the proposed ACEC, it was found that none are active, as they have not filed plans of operation or notices of intent.

22-2

Under Recreation, the statement "There are four OHV routes of travel in this area." is not accurate. The only two designated routes are the Nightmare Gulch and Blackrock Canyon trails, which are NOT shown in their entirety (see attached map #1), which together form a loop trip through the area (see attached map #2 for entire trail). Both are maintained as one trail by the Gear Grinders under the Cooperative Management Agreement with the BLM and California Department of Parks and Recreation, High Desert Area.

To address the Cultural portion, the geoglyph is up on the rim of Nightmare Gulch, as stated previously, and is both both inaccessible by vehicle and extremely difficult to find. Human intrusion will not be a factor on this artifact, unless its location is posted.

CHAPTER 4, ENVIRONMENTAL CONSEQUENCES

In this section Pages 4-2 and 4-3, contains some statements that are either disturbing or give no real indication as to the future status of the existing OHV routes.

Under Wildlife, "An ACEC could allow greater restrictions on activities, such as grazing and mineral exploration and development." Glenn Harris, the Ridgecrest Resource Area Range Specialist, indicated to us, that although this area is part of the Cantil Common Allotment, it is not suitable for grazing and is not used for that purpose.

Again, under Recreation, there are only two designated routes. Other than the seasonal closures, there are no valid reasons to close either Nightmare Gulch or Blackrock Canyon to vehicle travel.

Under Cultural Resources and Paleontological Resources, the statement is made that "Designation of this area as an ACEC would have little affect on cultural or paleontological resources." Another statement is made that "Under the MOU between BLM and Red Rock Canyon State Park, the area is currently managed as if it were within the State Park." and also ". . . the area is already receiving special management attention. . .". Therefore, as vehicle usage within the area is already well managed, and as neither grazing nor mining are currently factors within the proposed ACEC, we do not feel that the establishment of an ACEC is required or desirable.

CHAPTER 4 ENVIRONMENTAL CONSEQUENCES

22-6 The area on either side of the Eureka/Saline Corridor is already a WSA and, as such, is already protected from abuse. An ACEC designation would, therefore, be redundant and, indeed, the statement is made under Cultural Resources that the "level of protection for cultural resources now known to exist would not . . . increase". In other words, adequate protection for the area already exists.

22-7 On Page 4-3, under Wildlife and Vegetation, the statement is made that "irresponsible activities by users of the route could have detrimental effects. . . .". Nowhere is it stated that "irresponsible activities" have occurred. In fact, in another statement under Recreation (Page 3-4) it is noted that "Very little, if any, trail proliferation has occurred." It appears from the statements within this proposal that abuse of any kind resulting from the use of the Eureka/Saline Corridor is "non-existent and therefore not a factor" in the this ACEC proposal.

22-8 Our basic concern in both the Nightmare Gulch/Blackrock Canyon and Eureka/Saline Corridor areas, is the continued use of "existing trails". In the document - "Areas of Critical Environmental Concern (ACEC's) - Policy and Procedures Guidelines", by the U.S. Department of the Interior, Bureau of Land Management - June 1980, that add to that concern. On Page 2, under 3, (a) it states ". . . Provide special management attention that will protect important environmental resources," and (b) "do this without unnecessarily or unreasonably restricting users of these lands from uses that are compatible with that protection.". On Page 3, under 7, - ". . . ACEC identification "shall not, of itself, change or prevent change of the management or use of public lands", however the statement on Page 4, under 8, ". . . No activity incompatible or inconsistent with those requirements shall be allowed or undertaken by BLM" makes us uneasy. History of the Nightmare Gulch/Blackrock Canyon area shows a consistent attempt by either the state or environmentalists to halt vehicle use in the area. If this area were to designated an ACEC, in the "1989" Proposed Amendments would be an amendment prohibiting vehicle travel through the the area, stating that it is an "incompatible use" in an ACEC.


Therefore, we ask that the Bureau of Land Management reconsider it's original recommendation, and reject the ACEC designation for BOTH the Nightmare Gulch/Blackrock Canyon and the Dedeckera Canyon areas.

AMENDMENT 11 - DUMMONT DUNES OHV AREA

We would like to go on record as supporting your Preferred Alternative, to adopt Alternative B, and add areas 2 and 3 to the OHV area, which would include the historic use of the small dune areas, and would also improve the boundary manageability. We also agree, that adding area 4 would serve no useful purpose.

Thank you for extending the deadline for comment till August 21, 1989. The late date of receiving the document, and research required, would have made the original date very difficult to have made. Thank you, also, for considering our comments.

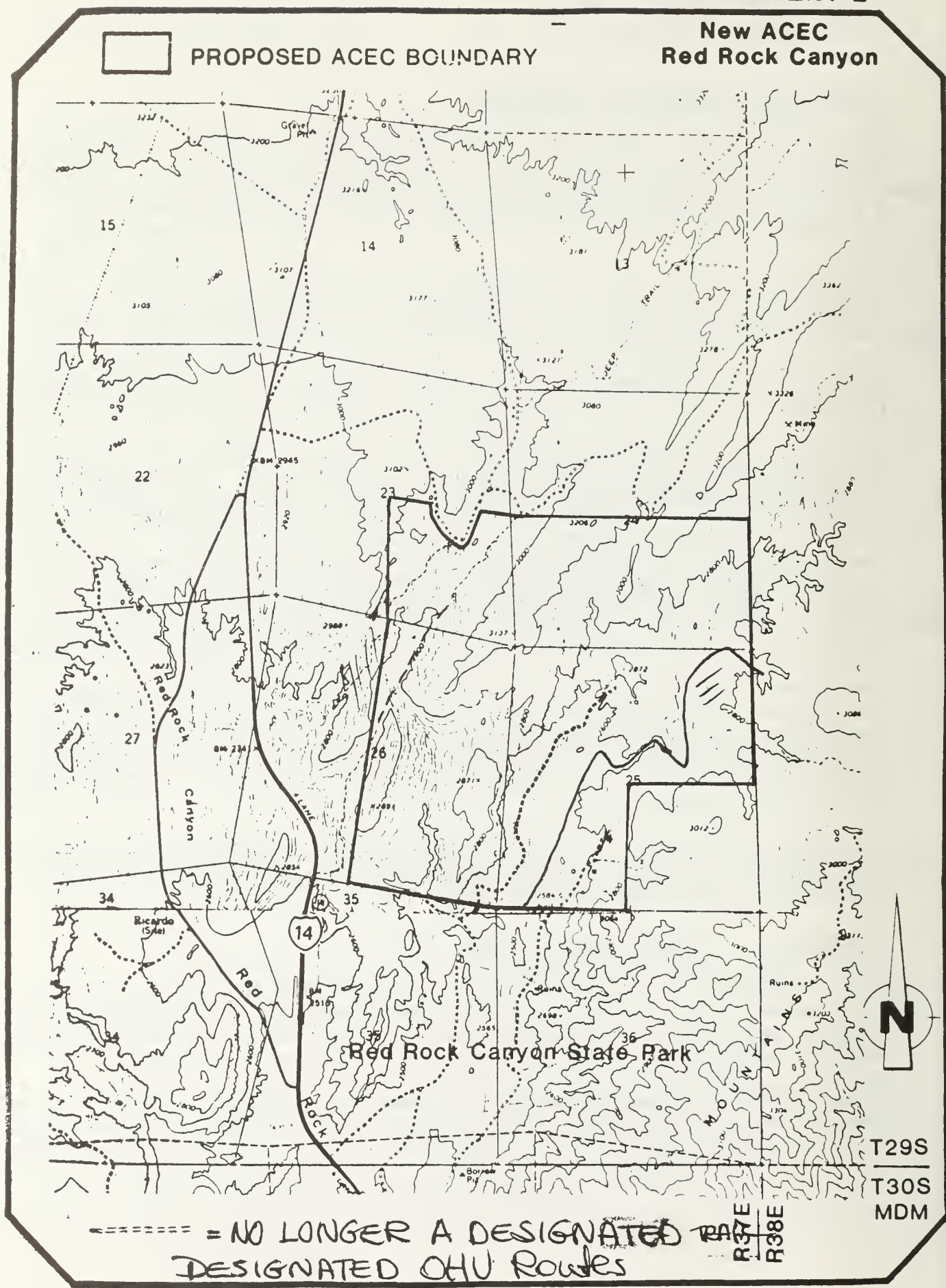
Sincerely,


Jeffery J. Tunnell
President

AMENDMENT 2

New ACEC Red Rock Canyon

 PROPOSED ACEC BOUNDARY



----- = NO LONGER A DESIGNATED TRAIL
..... DESIGNATED OHU Routes

R37E
R38E

T29S
T30S
MDM

SCENIC CLIFFS/NIGHTMARE GULCH FEBRUARY 1 - JULY 1
ANNUAL SEASONAL CLOSURE AREA

This map shows the area that is closed to all public entry from February 1 to July 1 of each year. The area includes approximately 1,200 acres of public land in T.29S., R.37E., MDM, Sec. 23 SE $\frac{1}{4}$ (portion south and east of the existing vehicle route), Sec. 24 S $\frac{1}{2}$, Sec. 25 N $\frac{1}{2}$ and SW $\frac{1}{4}$, and Sec. 26 E $\frac{1}{2}$ (portion east of the existing vehicle route).



-  = Annual Seasonal Closure Boundary
-  = Designated ORV Routes

SALTDAL NW QUADRANGLE
CALIFORNIA-KERN CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)

Response to Gear Grinders 4-WD Club

Response to 22-1

The BLM's preferred alternative for Amendment Two has changed from Alternative A to Alternative B, No Action. The area is currently receiving several types of management attention, including a Memorandum of Understanding (MOU) between the BLM and the California State Department of Parks and Recreation, a Cooperative Management Agreement (CMA) between State Parks, BLM, and the Audubon Society, and a CMA between State Parks, BLM, and the Gear Grinders 4-WD Club. These are described in the decision page for this amendment. Adding the ACEC designation would not improve the area's current management and protection.

Response to 22-2

The Environmental assessment was incorrect in stating that there are four designated OHV routes of travel in the proposed ACEC. In fact, three designated routes pass through the area: EP-125 (Blackrock Canyon), EP-123 (Nightmare Gulch), and EP-120, which connects to EP-123. All three of the routes are actually parts of one loop road. Routes EP-123 and EP-120 are closed from February 1 to July 1; from July 1 to January 31, vehicle use is allowed only between the 16th day and the end of each month.

Response to 22-3

The Canyon has been labeled on the map for this amendment; see the decision page. The Bureau does not intend to change vehicle access on the Eureka/Saline Corridor or to change the name of the corridor.

See also response to 14-2.

Response to 22-4

An example of a resource needing protection is the plant July gold (Dedeckera eurekaensis) which is found in Dedeckera Canyon. It is listed by the State of California as "Rare" and is also a candidate for Federal listing. The goal of the BLM is to protect species so that listing will not be necessary. This can better be accomplished by preventing degradation of habitat than by attempting to mitigate damage after it has occurred. Dedeckera is one of the few woody plants in this portion of the Eureka/Saline Corridor and could be inadvertently pulled out by campers or picnickers for use in campfires. ACEC management could educate the public and forestall such damage.

Response to Gear Grinders 4-WD Club (cont.)

Response to 22-5

Although each individual resource may, by itself, be insufficient justification for an ACEC designation, the diverse mix of significant resources of the Eureka/Saline Corridor -- wildlife, vegetation, cultural, scenic, and recreational values -- require greater management attention than is possible under the present Class "L" guidelines. An ACEC activity plan will address best to manage the area for the multiple values found there. During the interim period until Congress acts on wilderness designation, the Saline/Eureka Valley WSA is being managed according to Class "L" guidelines.

Response to 22-6

During the interim period until Congress acts on wilderness designation, the Saline Valley WSA is being managed according to Class "L" guidelines. See also response to 22-5.

Response to 22-7

See response to 22-5.

Response to 22-8

See responses to 14-2 and 22-1

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BUREAU OF LAND MANAGEMENT

YUMA AUDUBON SOCIETY

P.O. BOX 6395
YUMA, ARIZONA 85366-6395

933 AUG 17 PM 2:31

CALIF. DESERT DISTRICT
RIVERSIDE, CA.

August 15, 1989

23

California Desert District
Bureau of Land Management
ATTN: Plan Amendments
1695 Spruce Street
Riverside, California 92507

Dear Sir or Madam:

The following are Yuma Audubon's comments on the Proposed 1988 Plan Amendments to the California Desert Conservation Area Plan of 1980 Environmental Assessment.

In general, the 1988 amendments are a considerable improvement over earlier ones. There is much to support in this set of amendments, and most of them were generated by BLM. Several of the amendments are of special interest to us because they affect areas relatively close to Yuma.

We support adoption of Amendments 1, 2, and 3. These areas are all worthy of ACEC designation because of the outstanding animals, plants, and cultural resources they contain.

We are familiar with the Coyote Mountains area proposed for an expanded ACEC in Amendment 4 and support its adoption. This is an area of impressive biological and geological interest, supporting the Magic Gecko, which until recently wasn't even known to exist in the United States. There are very few ACECs established for palaeontological resources, and we warmly welcome protection of such resources through expansion of this ACEC.

We also support Amendments 8 and 9. We only wish stronger measures had been adopted earlier to protect such incredible areas as the Yuha Desert and the East Mesa. The cultural resources of these areas are a national treasure and should not be squandered on ORV play. The Flat-tailed Horned Lizard is finally getting some of the attention it deserves and hopefully Amendment 8 will help to arrest its decline. BLM, the Fish & Wildlife Service, the military, and Cal Fish & Game all need to devote constant attention to this jeopardized species.

BLM should assess cumulative effects on the Federal Endangered Yuma Clapper Rail and California Threatened and Federal Candidate Black Rail. This means assessing the potential effects of lining the All-American Canal, as the Bureau of Reclamation is proposing.

For similar reasons (wildlife, ORVs, and land disposal potential) we support Amendment 10 which covers part of the East Mohave.

23-1

We strongly urge BLM to reject Amendment 11. All you are doing by expanding the open area is encouraging ORV users to invade protected areas in ever-widening circles. As soon as you open a new area to them, they will expand into the adjacent non-open area. This especially concerns us because an open area would adjoin two more WSAs (220 and 222) if your proposed action is adopted. Right now, the limited access areas serve (or should serve with adequate enforcement) as a buffer between the existing open ORV area and the WSAs.

We agree with BLM that Amendment 12 should be rejected. We are especially concerned with impacts on the adjacent Desert Tortoise, especially since the Desert Tortoise has become an endangered species and in light of the need to manage so as to recover the species from endangered status.

We strongly support Amendments 13, 14, and 15. We are especially familiar with the Corridor M area and believe that the importance of the cultural and biological resources (including a Federal endangered species and a state-listed threatened species) justify not allowing powerline construction in this area.

Amendment 16 should be adopted, as BLM recommends. The Chuckwalla area is a unique collection of plants and animals, not only in California, but in the world. The presence of lush desert riparian vegetation and dunes make this an area to treasure.

We are glad to see that BLM recommends closing the Palen Dry Lake ACEC to vehicle access because of the early human cultural resources (Amendment 17). There is still much to be learned of the early inhabitants of California, and finds are more often than not fortuitous. Significant areas must be preserved from the destruction of ORVs and livestock trampling if we are to learn more about the first inhabitants of the California desert.

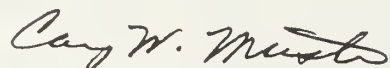
We support BLM's recommendations on Amendments 18 (adopt) and 19 (reject). Domestic sheep present too great a hazard to Desert Bighorn to allow them in the same area. These amendments involve only ephemeral allotments. We feel it is much better to allow the native wildlife to utilize whatever plants the livestock would otherwise be using and the ecology of this area is presumably tied to fluctuations in rainfall. Removing the vegetation through invasion by exotic animals in wet years reduces the native wildlife to a more steady or even disadvantaged state in terms of availability of vegetation. We believe this is a dangerous course to follow in such a delicate ecosystem where water (including that stored in vegetation) means life.

In general, then, we can say that we support BLM's recommendations for the 1988 amendments. However, we are very much concerned about Amendment 11 and feel that it should not be adopted in any form,

be it Alternative A, B, or C. Amendment 11 is our main point of disagreement with BLM.

Thank you for the opportunity to comment on this proposed action.

Sincerely,

A handwritten signature in cursive script that reads "Cary W. Meister".

Cary W. Meister
President

Response to Yuma Audubon Society

Response to 23-1

See responses to 5a-1, 13-2, and 24-2.

RECEIVED
1989 AUG 18 PM 3:05
DISTRICT

ELDEN HUGHES
14045 Honeysuckle Lane
Whittier, California 90604
(213) 941-5306

August 16, 1989

California Desert District
Bureau of Land Management
Attn: Plan Amendments
1695 Spruce Street
Riverside, CA 92507


24

RE: Amendment 11, Change class M to class I and vehicle access from Limited to open in area adjacent to dumont dunes OHV Area.

- 24-1 [None of the alternatives which enlarge the OHV area are adequate. Essentially they reward the past "breaking of the rules/lack of enforcement" by saying if the area has been trashed, let's include it in the OHV area.
- 24-2 [The buffer is neededo protect the WSA's, the ACEC, and the Amargosa. To say "the present boundary is unmanageable because the area of the dunes, themselves, changes constantly due to the shifting of the sands" is to display ignorance of both the dunes and management.
- 24-3 [To make the statements (4-13) that there is a high probability of cultural sites, but we will avoid the significant ones, while at the same time saying this is the area of historic use, makes the BLM look less than competent.

I recommend alternative D. Likely the camping areas need to be provided for, but neither A B or C provide adequate protection for surrounding resources.

Sincerely,



Response to Eldon Hughes

Response to 24-1

See response to 5a-1 and 13-3.

Response to 24-2

The writer's concern about needing a buffer to protect the WSAs, the ACEC, and the Amargosa River was relieved by an on-site visit with BLM personnel to observe the area and review management actions which are planned for protection of the areas of concern.

Response to 24-3

The term "historic use" refers to historic recreational use.
See also response to 12-4.

88EA026

Mary L. Grimsley

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800 AUG 18 PM 3:02

CALIF. DESERT DISTRICT
RIVERSIDE, CA

August 10, 1989

Gerald E. Hillier, District Manager
California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, Ca. 92507

RE: 1988 Proposed Plan Amendments

Dear Jerry,

I would like to thank you for extending the public comment period to August 21. Enclosed are my personal comments on a couple of the amendments with which I am familiar with.

As you may know, I am a member of the Gear Grinders 4WD Club in Ridgecrest, and the Gear Grinders has both of the "adopt-a-trail" agreements for the Nightmare Gulch/Blackrock Canyon area (amendment 2) and the Eureka/Saline Corridor (amendment 3 - Dedeckera Canyon). We have had both of the agreements for several years, and have done the required maintenance of each trail each year, so I have on the ground knowledge of both areas.

AMENDMENT 2 - NIGHTMARE GULCH/BLACKROCK CANYON

I have been involved with helping to retain the "use of vehicles on existing trails" in this area since the time the State applied to have the area added to Red Rock State Park. At that time, the State demonstrated that existing uses were incompatible with State guidelines, and said, in-as-much, that Nightmare Gulch would be closed to vehicle travel. Therefore, the BLM retained the area but has allowed the State to manage it with the provision that vehicle travel would be permitted in the area. Next came the attempt, by environmentalists, to get the area closed to vehicle travel, which ended in the 1/2-month time sharing that exists today. Then came the raptor closure from Feb. 1 - July 1 by the Audubon Society. Now the Audubon Society has proposed an ACEC designation for the area. How nice. Next year they will have an amendment that vehicle travel is incompatible with an ACEC designation, that is of course if a vehicle closure is not installed during the ACEC planning process. Jerry, this was all decided already, with a trip by the BLM Desert Advisory Council and BLM personnel through Nightmare Gulch, seeing that the slow vehicle travel through the Gulch was not having a negative impact on either vegetation or wildlife. Mother nature has changed the Gulch so significantly over the last ten years, it is sometimes hard to believe it is the same canyon bottom. I have seen it scrubbed out down to the bedrock, and the next year it is covered. I have seen the sides cave in, creating a lake behind the cave-in and raising the canyon bottom ten feet. The next year water had carved it's way through the cave-in, and the bottom was lowered.

1012 N. Sierra View
Ridgecrest, CA 93555
619-446-3458

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I feel this is another layer of unnecessary protection being added to this area. The protection that is already in place for the area with the 5-month closure to all entry during raptor breeding/nesting, along with the State Department of Parks and Recreation (SDPR) management, with the BLM overseeing, an ACEC designation is unnecessary.

Reading information pamphlets provided by the BLM, I found that the most active time for the desert Tortoise is March through June, when they pretty much return to their burrows, to hibernate till February. This is during the raptor breeding/nesting time, when the canyon is already closed, so this is not a valid reason for the proposed ACEC.

In reference to: "The Mojave ground squirrel may occur in portions of the affected area.", is an inappropriate and invalid statement. Dinosaurs "may occur", but no one has seen them. Page 3-2.

25-1

By the BLM's own admission, "A memorandum of Understanding (MOU) with Red Rock State Park currently affords protection for wildlife by controlling OHV use." Page 3-2. With 5 months of the year closed to OHV (and all other uses), and the other seven months are affected by the 1st half of the month closed to OHV use, the OHV use is very minimal.

On page 3-3, under vegetation, "The MOU with Red Rock State Park affords the plants some protection by controlling OHV use", and the statements, ". . . judged by California Native Plant Society to be vulnerable under present circumstances." and ". . . the CNPS considers vulnerable under present circumstances" are all irrelevant and misleading. Considering the forces of Mother Nature, which have changed the bottom of Nightmare Gulch from scrubbing it out down to the bedrock, and then, filling it back up with sand and rock, and still the plants come back and grow and survive. Unless, of course, the CNPS isn't talking about Nightmare Gulch, but the surrounding areas, of which there are no OHV trails or tracks.

As with mining affecting the wildlife and plants, after checking the records, there are 9 mining claims within the proposed ACEC, none of which are active, for they have not filed plans of operation or notices of intent.

25-2

Under recreation, page 3-3, the statement "There are four OHV routes of travel in this area." is completely untrue and misleading. The only two designated routes are the Nightmare Gulch trail and the Blackrock Canyon trail - which together form a loop trip through the area. The other two trails (marked on Appendices Map-attached) have not been designated trails for quite some time. On the map in the Proposed 1988 Plan amendments, in the Appendices, the complete trail system of Nightmare Gulch and Blackrock Canyons are not shown, so I have attached a second map (map #2) which was printed out of the file which can be found at the Ridgecrest BLM Office.

I also take to task the statement ". . . frequent day use of the area for hiking by people enjoying the area's scenic qualities and interesting native flora and fauna." Hikers do not have a monopoly on enjoying scenic qualities and flora and fauna. That is the same reason we, 4-wheelers, enjoying driving the gulch, to show new people and visitors the unique geologic formations, as well as "seeing" various raptors, bobcat, and fox. The wildlife are not as afraid of vehicles as the public is being led to believe. Man poses more of a threat on foot than in a vehicle.

The geoglyph is up on the rim of Nightmare Gulch, and is extremely hard to find, even when you know what to look for. Being basically unknown, has protected it so far. Do not sign it to bring it more attention, or it will disappear. Weather is it's greatest enemy.

In Chapter 4, Environmental Consequences, on Page 4-2 & 4-3, there are some statements that are confusing and give no real indication as^{to} the future of these existing OHV routes.

Under Wildlife, "An ACEC could allow greater restrictions on activities, such as grazing and mineral exploration and development". I went to the Ridgecrest BLM Office to investigate grazing and mining in the area. According to Glenn Harris, Ridgecrest Resource Area Range Specialist, this area is part of the Cantil Common Allotment, however it is not used for grazing. It was part of the old "stock driveway". According to Mr. Harris, "this area doesn't lend itself to grazing".

I checked the Red Rock/Nightmare Gulch file in the Ridgecrest office, and also talked to the ranger in charge of mining claims, and there are nine (9) claims, of which none are active as no~~one~~ has filed a Plan of Operation or an Intent to Mine.

25-3 Again, under Recreation, there are only TWO designated routes. Other than the seasonal closures, there are no valid reasons to close either Nightmare Gulch or Blackrock Canyon.

25-4 Under Cultural Resources and Paleontological Resources, the state^{ment} is made that "Designation of this area as an ACEC would have little affect on cultural or paleontological resources." Then why make the area an ACEC? Another statement, "Under the MOU between BLM and the Red Rock Canyon State Park, the area is currently managed as if it were within the State Park.", and (in summary) ". . . the area is already receiving special management attention . . .". Then why make the area an ACEC? Additional restrictions on grazing no longer applies, and with the strict mining regulations, the fact that mining is generally around the perimeter of the proposed ACEC, and that no mining is currently being proposed by the current mine/claim holders, I do not feel that an ACEC is necessary, but redundant.

Therefore, I strongly urge the Bureau of Land Management to reject Amendment 2, an ACEC for Land Adacent to Red Rock Canyon.

AMENDMENT 3 - NEW ACEC AT DEDECKERA CANYON

On Page 2-2, under Proponent's Reason for Submission, reason's stated for the establishment of the new ACEC include, ". . . there is evidence that they [archaeological sites] should be protected from degradation", yet, nowhere in the text is there any evidence given substantiating the "degradation" to any sites.

Also, "Camping in the canyon could be hazardous to both the natural resources and to the campers, as flash floods may sweep down the canyon with great force." First, camping in the canyon is infrequent at best, considering the camping available at Eureka Dunes and at the hot springs in Saline Valley. The Gear Grinders have camped twice north of, near, the "narrows", while doing trail maintenance, however, this is not the norm. The hazard of "flash floods to campers in the canyon" is an emotional statement that is completely invalid. Any canyon in the desert is a hazard in those conditions. Both Ridgecrest and Olancha should be moved from their present locations to high ground. However, the statement does prove one point: flash floods cause more damage to the natural resources as it "sweeps down the canyon with great force", than would any campers. In fact, any evidence of campers would be removed.

I am sure that "the dolomite cliffs of the Last Chance Range [probably] provide nesting and roosting habitat for raptors as well as habitat for bighorn sheep." However, this does not mean an ACEC is necessary.

25-5

I agree "the cliffs of the Last Chance Range also provide habitat for many plant species endemic to the Death Valley Region"(Page 3-3). I recently learned that Ms. Mary Dedecker visited Cerro Gordo, and pointed out a Category 2 candidate for listing plant - July gold (Dedeckera eurekaensis) around the mining camp, which I would assume is growing all through the Inyo Mountains, and not just in Dedeckera Canyon. I feel the above statement could be applied throughout the region, and is a weak argument for an ACEC designation.

A cultural resource inventory "may" need to be done, but an ACEC designation solely for the purpose of obtaining more funds to do so, [according to a source which attended the recent Desert Advisory Council meeting in Riverside], is not appropriate.

Stated under Recreation, "Very little, if any trail proliferation has occurred." The terrain on each side of the corridor does not lend itself to cross-country travel, hence, there is no trail proliferation. Also stated, "Some visitors to the area hike up side canyons to examine the proposed ACEC's unique flora and fauna". This statement eludes to the fact where the unique flora and fauna is located, and not where vehicles are likely to disturb them. Page 3-4.

25-6

In Chapter 4, Environmental Consequences, the statement under Wildlife and Vegetation "An ACEC could give added protection to the sensitive plant species July gold by controlling the activities of users of the Eureka-Saline Corridor". What kind of "controls" are you talking about, when under Recreation, the statement is made, "Since the only route within the proposed ACEC would remain open, there should be no effect on any recreation activities . . ." ?? One statement contradicts the other.

Under Alternative B, "Any proliferation of the Eureka-Saline Corridor or irresponsible activities by users of the route could have detrimental effects . . ." is an unsubstantiated and invalid statement.

Therefore, I strongly urge the Bureau of Land Management to reject Amendment 3, a New ACEC at Dedeckera Canyon.

AMENDMENT 11, . . . DUMMONT DUNES . . .

I do support the BLM position on adopting Alternative B for the Dummont Dunes, as it would - as stated on Page 2-5 "include the majority of the historic OHV use area, provide for family and individual OHV activity, and would improve the boundary manageability." I also agree that adding Area 4 is not necessary.

Thank you for considering my thoughts and comments on these proposed amendments. I hope they will help you make that difficult decision.

Sincerely,

Mary L. Grimsley

Jerry - i would personally like to invite you to travel through Nightmare Gulch/Blackrock Canyon with Jerry & I & the GEAR GRINDER with any of your staff. please Ucell (619) 446-3458.

Response to Mary Grimsley

Response to 25-1

See response to 22-1

Response to 25-2

See response to 22-2

Response to 25-3

See response to 22-2

Response to 25-4

See response to 22-1.

Response to 25-5

See response to 22-5.

Response to 25-6

See response to 22-4.

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19 August 1989

California Desert District Office
Bureau of Land Management
ATTN: Plan Amendments
1695 Spruce Street
Riverside California

26

Dear Mr. Hillier,

The purpose of my letter is to provide clarification of the back country vehicle use opportunities in the proposed Red Rock Canyon ACEC(Amendment #2). The plan indicates that there four designated routes of travel in the ACEC area. The map provided does not correctly show the trails available for use. Enclosure (1) presents a corrected map showing both open and existing closed trails.

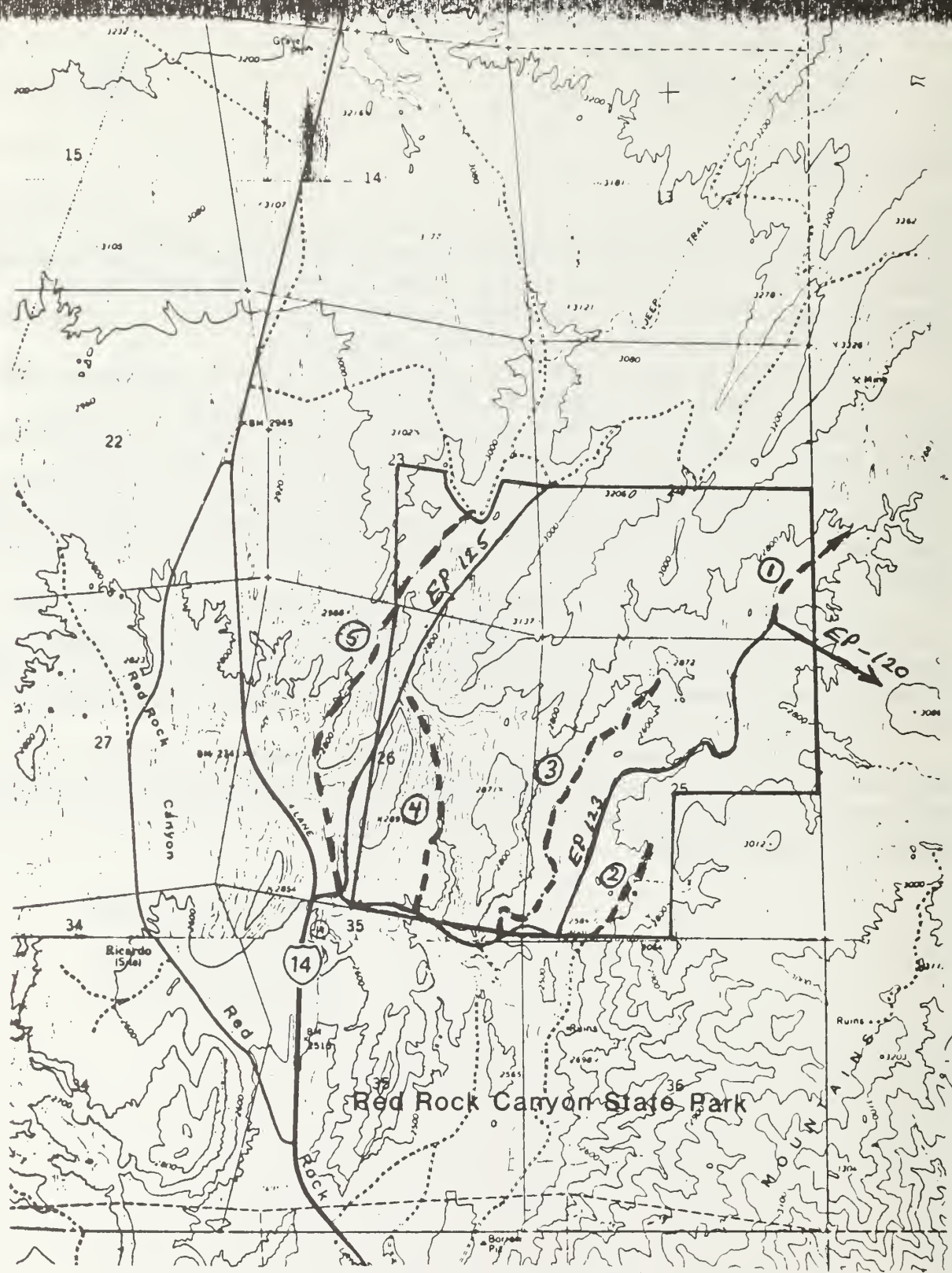
26-1

EP 123,EP 120 and EP 125 form part of a loop trail which is maintained under an Adopt-A-Trail agreement between the GearGrinders 4WD Club and the BLM. Vehicle use of EP 123 and EP 120 is prohibited from the 1st through the 15th of each month. Further, EP 123 and EP 120 are closed to all public entry from February through June to protect raptor nesting. Trails 1 through 5, shown on the attached map, are closed to vehicle use. Has the State Park been illegally denying vehicle access? Clarification of which trails are suppose to be open to back country vehicle use is needed.

Nightmare Gulch(EP 123) and Blackrock Canyon(EP 125) are unique areas and deserve special protection. In my view, this area is currently receiving that protection. Unfortunately, I view the proposed ACEC status as simply another strategy for the ultra-environmentalists to "get the vehicles out". A goal that they have been working toward for 10 years.

I just finished reviewing the Afton Canyon ACEC Management Plan, and was very disillusioned to see vehicle routes in non-sensitive areas arbitrarily closed. With these fears in mind, I must oppose ACEC status for Red Rock Canyon and recommend rejection of Amendment #2.

Jerry D Grimsley
Jerry D. Grimsley
1012 N. Sierra View
Ridgecrest Ca. 93555



— OPEN (SOME RESTRICTIONS APPLY)
 - - - CURRENTLY CLOSED

R37E
 R38E
 T29S
 T30S
 MDM

Response to Jerry D. Grimsley

Response to 26-1

See response to 22-2.

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CALIF. DESERT DISTRICT
RIVERSIDE, CA

ELDEN HUGHES
14045 Honeysuckle Lane
Whittier, California 90604
(213) 941-5306

August 16, 1989

27

California Desert District
Bureau of Land Management
Attn: Plan Amendments
1695 Spruce Street
Riverside, CA 92507

RE: Amendments Deferred: 88-p-15 Remove all grazing in the East Mojave National Scenic Area west of Kelbaker Road.

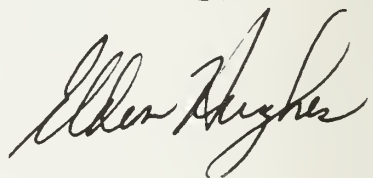
27-1

I submitted the above amendment in behalf of the Sierra Club. The amendment discussed scenic values in the Kelso dunes which were note addressed in reason for deferment. The stated reason for deferment is an evaluation in an upcoming study.

The bighorn are at risk. The scholarly papers submitted with the amendment, document the risk. If the BLM is funding the upcoming evaluation, then it should state who is doing the study, when it will be completed, what criteria will be used to determine the "at risk" status of the bighorn sheep, and who will submit the appropriate amendment.

The deferral statement is totally inadequate.

Sincerely,



Response to Eldon Hughes

Response to 27-1

Conflicts between cattle and scenic values in a small area can be resolved without eliminating grazing on 375,000 acres. The Kelso Dunes are largely untouched by cattle or humans. Efforts are currently underway to reduce the number of cattle in the parts of the dunes that receive the most visitor use.

There are presently two separate studies on possible conflicts between bighorn sheep and cattle. Although cattle have been blamed for spreading diseases to bighorn, there is no clear evidence that they carry the diseases in question. In the first study, the Department of Fish and Game will study pathogens in the blood serum of bighorn and cattle in the Granite Mountains. In the second study, Dr. John Weyhausen has compared bighorn sheep in the Marble Mountains (no grazing) with sheep in the Old Woman Mountains (grazed). He is now comparing bighorn in the Old Dad Mountains (no grazing) with bighorn in the Granite Mountains (grazed). If the results of the above studies show that cattle grazing is depressing the local bighorn populations, BLM will attempt to correct the situation. A Plan Amendment will be introduced, if necessary. Proposals from other private or governmental agencies will also be considered at that time. If the results of the studies fail to establish a link between cattle and sheep populations, BLM will continue to support and facilitate studies that might identify factors that limit the bighorn sheep population.



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CALIFORNIA DESERT DISTRICT

SIERRA CLUB

Southern California Regional Conservation Committee
August 16, 1989

California Desert District
Bureau of Land Management
Attn: Plan Amendments
1695 Spruce Street
Riverside, CA 92507

28

Dear Mr. Hillier, *Gerry*

The Sierra Club offers the following comments on the 1988 Proposed Plan Amendments.

28-1

First, once again, we repeat that one of the plan amendments ought to be to eliminate the cycle of annual plan amendments. The annual self examination hardly gives any Resource Area Manager the discretion to make a decision based on the existing plan before one of the proposed decisions gets tossed up as a Plan Amendment. The annual process is extremely labor intensive, costly and time consuming. It defeats the purpose of planning, which is to GIVE DIRECTION AND GUIDANCE FOR INDIVIDUAL DECISIONS BY RESOURCE AREA MANAGERS. The inefficiency of the annual process is illustrated by the fact that it is halfway into 1989 and we are just now looking at proposed 1988 amendments. Before these were available to the public the deadline had passed for submitting the 1989 proposed amendments.

Comments on specific Plan Amendments

1. Sierra Club supports the designation of the new ACEC at Rodman Mountains.

28-2

2. Sierra Club supports the new ACEC adjacent to Red Rock Canyon in so far as it improves possible management of the area until the lands are deeded to Red Rock Canyon State Park as is proposed in S.11, H.R. 780.

We find the justification very curious.

BLM resisted transferring these lands to Red Rock Canyon State Park it agreed to do when the park was established. Much foot dragging by BLM occurred because BLM has maintained that it felt it necessary to retain title to the lands so that:
mining could continue;
grazing could continue;
and ORV could continue.

However,

A. ORV traffic has had to be curtailed because it was disturbing eagle nests and traversed the very canyons where the

endangered plants were trying to survive.

B. if it is designated as an ACEC, BLM "could allow greater restrictions on activities such as ... mineral exploration and development."

C. if it is designated an ACEC, BLM could place "greater restrictions on activities such as grazing...."

What justification then remains for continued BLM title? Are the few blades of grass in this portion of one desert allotment more important than the endangered plant species?

28-2 We also noticed that grazing restrictions will help the wildlife but not the plants. Except for preparing the necessary ACEC plan, (probably with funds from the State Fish and Game Commission) BLM will have little on the ground responsibility in this area, since it is being patrolled already by State Park rangers. As it states in the EA portion, the area is already being managed as part of the State Park. Why then the resistance to giving the State Park title?

Since, the "No Action" alternative admits that the current Desert Plan is not capable of maintaining the habitat for the Mojave Ground Squirrel, Desert Tortoise, as there is little choice but to opt for the ACEC at present.

28-3 There is an omission in the environmental assessment in that it does not spell out what the relationship will be between this ACEC and the ACEC just to the east that encompasses Last Chance Canyon where there are at least 60 sites of historic and prehistoric interest.

3. We support the designation of the ACEC for Dedeckera Canyon.

28-4 We are however, confused about the intent and probable management actions contemplated for this ACEC - they seem inconsistent and at cross purposes. The mere designation will not protect anything unless the land managers have something to implement. There is an assertion that there will be additional protection by "controlling the actions of users on the Saline-Eureka Corridor." However, it also states that there will be no effect on recreation activities which are in conformance with the IMP. (Does that mean that BLM is aware of activities not in conformance and cannot control those activities without the designation of the ACEC? What does that say about non-conformance in areas in which there is no ACEC?) It also states that the open route could be a potential threat to adjacent resources (presumably the Dedeckera for which the canyon is named), and that the route will remain open.

Does the designation of this ACEC indicate that protection of the recently discovered and sensitive Dedeckera is considered more important? How important is it? Obviously not as important as keeping the route open. How will the actions of users of the route be controlled without having an effect on the recreation activities of users of the canyon?

4. We support the expansion of the Coyote Mountains ACEC.

28-5 What does "increased management priority mean" in terms of management direction? The document should be able to say plainly that collection of fossils will not be allowed in the ACEC if that is the intent. That does seem to be the management direction when one reads the section on effects of the designation on Recreation. Is there a management plan for the existing ACEC? Would this additional area operate under the same general management plan? Was this information discovered during the preparation of that ACEC?

28-6 5. BLM is not entitled to simply abandon the ACEC site if it is important. What will Fort Irwin be doing to protect the cultural resource? Appendix D, Page 74 of the Desert Plan states that the Secretary of Defense has relinquished responsibility for cultural preservation to the Secretary of Interior, thus it appears that acceptance of the Plan Amendment would not be in conformat with existing policy.

28-7 6. and 7. Are we to presume that the Kramer Hills and Dale Lake sites have been decimated? If there is nothing there, it makes sense to remove the designation. If there was a mapping error, then the correct sites should be located. Current archaeologists on staff at BLM are surely no more or less susceptible to mapping errors than the members of the Desert Plan staff who located the site originally. Where is the assessment of the effect of removing this ACEC designation to the Desert Tortoise? Kramer Hills lies within important tortoise habitat.

28-8 9. Sierra Club would support a change from Class M to Class C if that is what is required to protect the Flat Tailed Horned Lizard, geoglyphs and other cultural resorces. It appears that changing to Class L would only prevent NEW sources of impact, such as land disposal. Existing plans have NOT, according to BLM's own statements, succeeded in halting the degradation. The principal culprit is ORV use, but the class change would not do anything more to restrict vehicle activity. If in the absence of mineral entry problems and land disposal BLM is unable to save the resource, what good will the class change do? It appears to be too little, and too late.

28-9 9. Sierra Club supports the class change for East Mesa. The map and the text are not consistent. The text states that the area of high ORV use around Gordon's Well will be excluded, but the map appears to include the area. Which is it going to be?

28-10 There is another inconsistency with respect to the Desert Plan. Under the Motorized Vehicle Element, the current ACEC is indicated as only being available for approved routes of travel, thus if there is ORV play and associated camping as is described, it is not supposed to be permitted. Such use should be described.

There is an inadequate description of the existing ORV use.

28-10 There is an inadequate description of the existing ORV use. Low to moderate use, when it comes to ORV areas, means that there may still be 6 or 8 foot creosote bushes standing. Something more quantitative is needed. The Sierra Club has personally viewed several groups of 10 or more ORV support vehicles (camper, truck, motorhome, etc.) at many points along the west side of the Coachella Canal on the same day. There is practically a "highway" which runs alongside the canal.

28-11 As in the case with Amendment 8, the principal culprit in endangering the resources appears to be ORV use. If such use is not going to be constrained then restrictions on possible dangers from landfills, mines or agriculture will not be enough to save the resource.

10. The Sierra Club has consistently supported more protective class designations inside the national scenic area. Progress is being made -- it moved from unclassified to M, now we're moving from M to L.


28-12 11. and 12. Sierra Club opposes both class changes. The first, for the expansion of the Dumont Dunes Open area, is uncalled for, and would be extremely destructive of the Wilderness Study Area resource values. Never have we seen an ORV area in which users stayed where they were supposed to unless there is an enormous natural barrier. Making the ORV boundary contiguous with the WSA boundary (fortunately not proposed for overlap as in the case of the Imperial Dunes) is inviting conflict along the boundary. Also, the natural resources of Amargosa Canyon would be endangered. We would prefer the area have no change than one which rewards unauthorized and illegal use outside the open area by expanding the open area boundaries.

16. Sierra Club supports the change in Chuckwalla Dune Thicket Motor Vehicle Access.

Please correct the document. One place refers to a September 1981 ACEC plan implementation, another to a 1982 ACEC plan.

17., 18., 19. We support the changes proposed in Amendments 17 and 18, and oppose the grazing increase of Amendment 19

Sincerely,


Judith A. Anderson
for the Desert Committee

JA:ts

Response to Sierra Club, Judith Anderson

Response to 28-1

Your comment is noted.

Response to 28-2

Your comment is noted.

Response to 28-3

The Last Chance ACEC is approximately 4 miles north of the proposed ACEC. It is designated for protection of cultural resources and has no particular relationship to the proposed ACEC.

Response to 28-4

See responses to 14-2, 22-4, and 22-5.

Response to 28-5

The term "increased management priority" means that fossil resources within the Coyote Mountain area would receive greater attention. Prohibition of fossil collection became necessary when Bureau personnel noted an alarming reduction in fossil numbers in prime areas. Fossil collection in the expansion area was placed under a temporary prohibition ordering April, 1988; this restriction will become permanent with the approval of this amendment. The expansion area will be managed under the prescription of the ACEC activity plan completed in 1987.

Response to 28-6

The National Historic Preservation Act (Sections 106 and 110) requires the Army to manage cultural resources within the boundaries of lands under the Department of the Army's jurisdiction. In addition, the Army has a memorandum of Agreement with the State Historic Preservation Officer and the Advisory Council on Historic Preservation to assist Fort Irwin personnel in their identification and inventory program on cultural resources.

See also response to 11-1.

Response to 28-7

The Dale Lake and Kramer Hills ACECs were established by the CDCA Plan in 1980. The field data used by the CDCA staff was based on resource information and recommendations submitted by individuals from the private sector. Neither of the proposed areas was evaluated

Response to Sierra Club, Judith Anderson (cont.)

in the field by BLM archaeologists prior to their designation as cultural ACECs. Attempts by BLM archaeologists (since 1980) to locate significant archaeological sites within the boundaries of both the Dale Lake and Kramer Hills ACECs have been unsuccessful. Five sparse lithic scatters comprise the total number of recorded sites within the Dale Lake ACEC. One site was surface collected by San Bernardino County Museum and has lost its integrity. Scientific values of remaining sites are marginal. No cultural resources are recorded within the boundaries of the Kramer Hills ACEC.

Response to 28-8

The condition of resources within the Yuha Desert Management Plan area has stabilized through a series of actions initiated by the 1985 Yuha Desert Management Plan. We acknowledged in that plan that existing measures enacted since 1980 had been insufficient to prevent a deterioration of resources. Some of the actions instituted to reverse the downward trend include increased patrol, better signing, closing of some routes, limiting competitive racing, and prohibiting camping in certain areas. In addition, race courses have been rehabilitated and access guides have been published. Some impacts still occur because of the visitor load, but the overall trend is stabilizing.

Response to 28-9

The map for Amendment 9 in the EA includes the Gordon's Well area in the proposed change from "M" to "L". The map is in error and should have excluded the Gordon's Well area (Sec 31, T.16S., R.20E., SBM). This correction has been made in the final map.

Response to 28-10

The Gordon's Well area is within the East Mesa ACEC and is a Class "M" area. A Class "T" open area exists east of Gordon's Well and is not a part of the proposed amendment, but the area is often referred to as Gordon's Well or East Mesa. The recreation description for Amendment 9 incorrectly referred to OHV play in the adjacent open area as occurring in East Mesa. The camping and use on private lands adjacent to the ACEC may have also been referred to as "OHV play" in East Mesa.

The CDCA Plan permits camping within 300 feet of approved routes of travel. The Southern East Mesa ACEC and the East Mesa wildlife Habitat Management Plan do not limit the area of camping in Section 31. Inventories found very little evidence of the Flat-tailed Horned Lizard in this parcel. The camping referred to occurs on or adjacent to an approved route of travel and is also within the Bureau of Reclamation's withdrawn 2000 foot-wide right-of-way for the Coachella Canal.

Response to Sierra Club, Judith Anderson

Response to 28-11

A variety of factors could affect the flat-tailed horned lizard (FTHL). Monitoring studies are continuing with the hope of determining the specific causes of both positive and negative effects. There is little evidence of the presence of the FTHL in the Gordon's Well area, and a trend of decline within the FTHL habitat for the East Mesa. Therefore, charges that off-road vehicles are the principal cause of endangering the FTHL in an area where declines have not been proven is merely speculation.

The CDCA Plan, as amended, is not the only way to protect the habitat of the FTHL. The BLM is pursuing a variety of approaches in the East Mesa ACEC. On July 27, 1989, important FTHL habitat on the east side of the ACEC was closed to all camping. The closure removes the main attraction for recreational use of the East Mesa ACEC and is designed to prevent overflow camping from extending into important habitat.

Response to 28-12

See responses to 5a-1, 6-1, 13-2



PATRICE DAVISON
 FIELD REPRESENTATIVE
 P.O. Box 2151, Riverside, CA 92516

August 21, 1989

29

Mr. Gerald Hillier
 Manager,
 BLM Desert District
 1695 Spruce Street
 Riverside, Ca.

Re: Comments on proposed 1988 Desert Plan Amendments

Dear Mr. Hillier:

These comments reflect the concerns of the California Association of Four Wheel Drive Clubs. In general, the Association has great difficulty accepting proposals for increasing the number of ACECs, when there is no new outstanding information warranting such designation.

Comments are referenced by Amendment number:

29-1

Amendment 1 - None of the reasons provided are justification for this additional ACEC. The description accompanying the proposal clearly points to a lack of adequate consideration of alternatives. The Bureau's compulsion to automatically designate an ACEC where potential for controversy or problem exists is an easy way out that neglects the public and ignores the resource. If public visitation is a problem, it would seem more appropriate to stop the current practice (of Barstow BLM personnel) of intentionally directing people to the area. If one were to speculate, it would seem as if this was merely an initial step in the process to close the area to public enjoyment and appreciation. The case has not been made for this designation, and the proposal must be rejected.

29-2

Amendment 2 - Please refer to the High Desert Multiple Use Coalition's extensive comments on this matter. Once again, it would appear that the automatic reaction is to close (via ACEC) where possible, even when the circumstances do not warrant such.

29-3

Amendment 3 - Again refer to HDMUC comments. If this area warrants ACEC designation, than perhaps the majority of the California Desert should also be proposed for ACEC status. The case for ACEC designation must be solid and appropriate.

Amendment 4 - Better definition of paleontological values does not warrant enlargement of this ACEC. Reject this proposal.

Amendments 5,6,7 - Support the deletions.

Amendment 8 - Strongly oppose. The existing BLM management efforts are satisfactory, no proven need to change. Why eliminate what is working ?

29-4 Amendment 9 - Strongly oppose because this change will result in increased limitations on vehicle access.

29-5 Amendment 10 - Oppose in part. If Alternative B was proposed, excluding Mescal and Cinder mine areas, would be acceptable. The degree of mining in the area suggests that some modification to the amendment is necessary.

29-6 Amendment 11 - In our best judgement, Alternative C is the best recommendation. The popular area should be enlarged as much as possible to counteract the restrictive actions occurring elsewhere. The BLM must provide for the displaced user.

Amendment 12 - Support

29-7 Amendment 16 - Strongly oppose the closure to motorized use. The validity of this area as an ACEC has been questionable from the start. This proposal is an example of how ACEC designation is used as a step in the process to close an area to public use. Although sometimes measured and incremental, the end result is the same. This area, if closed, would restrict the legitimate access for other areas as well.

29-8 Amendment 17 - Same comment as 16 with the addition that the question of managability must be examined. ACEC designation should not mean closure of motorized access. Routes must be available for public use. Management by closure is a sad commentary on the Bureau's abilities, and decreases the public confidence.

It is the desire of this Association that the foregoing comments serve as a means to facilitate some future communication regarding the proposals. Richard MacPherson is the key contact and can be reached through my office, or you may call him (714) 682-6924 at home to set up an appointment.

Thank you very much for this opportunity to comment on the 1988 Plan Amendments.

Sincerely,



Patrice Davison
Field Representative
California Association of Four Wheel Drive Clubs
PO Box 2151, Riverside, Ca. 92516
(714) 369-8960

Response to Patrice Davison, CA Assn. 4-WD Clubs

Response to 29-1

Cultural resources within the proposed ACEC are listed on the National Register of Historic Places. Executive Order 11593 requires federal agencies to administer and maintain properties so that archaeologically significant sites are preserved, restored and maintained (16 U.S.C. 433.2.b.4 1982). The National Historic Preservation Act, Section 10, requires federal agencies to locate, inventory, and nominate to the Secretary of Interior all properties under its control that appear to qualify for inclusion on the National Register and exercise caution so that historic properties are not allowed to deteriorate significantly.

Cultural resources within the proposed ACEC have been vandalized and subjected to other impacts. Designation of this area as an ACEC will provide the BLM with the mechanism to give this area special management to prevent continued impacts. It will also facilitate development of a program to educate the public in the appreciation and enjoyment of the cultural resources in this area of the California Desert.

Response to 29-2: See response to 22-1.

Response to 29-3: See response to 22-5.

Response to 29-4

A change in MUC from Class "M" to Class "L" will not increase limitations on vehicle access on the East Mesa. The vehicle access designation in this area is "limited." Existing routes have already been designated "open" or "closed" in the route designation process. In addition, the area of moderate-to-heavy use around Gordon's Well and east of the Old Coachella Canal has been specifically excluded from the MUC change.

Response to 29-5

The difference between the MUC guidelines for mining in Classes "M" and "L" is that a plan of operations is required in Class "L" for operation on areas of 5 acres or less. The effect of this change in the Mescal Range would be negligible, since almost all mining operations are larger than 5 acres and already require a plan of operations.

Response to 29-6

Alternative C was rejected as it could have negative effects on the Amargosa River and, potentially, on Death Valley National Monument.

Response to 29-7 and 29-8

Both ACEC plans had previously closed these areas to vehicles. The proposed amendments merely provide additional documentation of the decision. In addition, neither ACEC contains a designated route of travel. Consequently, no reduction of authorized 4-WD use will occur.



HIGH DESERT MULTIPLE-USE COALITION

P.O. BOX 1167, RIDGECREST, CA 93555



August 18, 1989

Mr. Gerald E. Hillier
 District Manager
 California Desert District
 Bureau of Land Management
 1695 Spruce Street
 Riverside, California 92507

30

Re: Proposed 1988 Amendments to the 1980 CDCA Plan

Dear Mr. Hillier:

Please consider our comments on the following proposed amendments:

1) Rodman Mountains proposed ACEC

30-1 We support Alternative A, that this area deserves ACEC designation. We are concerned that the intensive management to be implemented under this Alternative could, however, involve signing, campground development, etc., which could actually increase use of the area by persons who do not, at this time, expend the effort necessary to find areas of such cultural value. Rather than increasing patrols, displaying regulations and so forth, the best protection for such resources might be a resident who is allowed by the BLM to live on site on a rent free basis in return for functioning as site caretaker and interpreter.

2) Red Rock Canyon, proposed ACEC

This amendment is being proposed for its desired positive impact on botany and wildlife (p. S-3). Several members of the High Desert Multiple-Use Coalition (HDMUC) recently visited this area. We noted that the area is indeed outstanding raptor habitat. We stopped to observe a great-horned owl perched above us in Nightmare Gulch, at this time the only usable vehicle route in the subject area. He was relatively unconcerned with our presence and never left his perch throughout 10 minutes of observation and the subsequent passage of our three vehicles. Special attention was paid to the effects upon the environment of the uses of man and the processes of nature during our visit. The area is a part of the Cantil common allotment but overgrazing, or anything else livestock-related, is a "non-problem" in the area and may be confirmed as such by Mr. Glenn Harris, BLM Range Conservationist, Ridgecrest Resource Area.

There are nine mining claims in the area, none of which are active, and, no plans or notices of intent to open new mines have been filed as of the date of these comments. We could not find any recent evidence of abuse of resources by prospectors or any other human visitors and, with the restraints placed upon vehicle travel by natural barriers and regulatory agency policies, we found that there is no proliferation, whatsoever, of vehicle routes.

We also visited the site of the geoglyph or intaglio. It is a short distance from Nightmare Gulch but the hiking route to it cannot be found except by one who already knows the way. The foot trail, where it exists, is only barely visible and the way is steep and slippery in places. The intaglio is small, perhaps 20 feet across its widest dimension, and does not obviously represent anything recognizable. While somewhat significant because of its rarity in the locale, it is not impressive when compared to other Southwest desert sites. We believe it is in no particular danger and is not deserving of any special protection at this time other than that which would be afforded by an intentional omission of any publicity efforts on the part of the managing agencies.

30-2 It is unclear to us why this area needs ACEC designation. The Nightmare Gulch route is already closed to all human visitation from February 1 to July 1 each year for the protection of raptors during their nesting season. The timing of this closure also benefits desert tortoises, who are most active outside their burrows from March 1 through June 30, according to Desert Tortoise Natural Area literature. The Nightmare Gulch-Black Rock Canyon Loop is the only passable route through the area at present. As a note, the map of this area in the back of the Proposed Amendments book doesn't show this complete route but it does show routes that are impassable and effectively no longer exist. The Loop route is additionally closed to vehicles for one-half of each of the other seven months of the year (open only for non-motorized travel during the other half of each of those months).

30-3

While it is stated on page 3-2 that the Mojave ground squirrel may occur in portions of this area, this has not been positively documented. As for endangered plants, the only serious danger here is from the "scouring" effects of heavy, localized rainfall. Such runoff frequently makes dramatic changes to features in the canyon bottoms but the native plants evolved under these conditions. By the way, when repairs to the abovementioned Loop are necessary to maintain passability from one year to the next, this maintenance is performed by the Geargrinders 4WD Club of Ridgecrest via a Cooperative Management Agreement (CMA) between themselves, the BLM and State Parks, signed 8/22/85. The cost to the public for this, being only for the required supplies and materials, is minimal. We understand that the BLM is able to gain additional funds for the management of an area if the area can be declared an ACEC. We don't believe

that this is ethical, however, unless the environmental concerns of an area can stand on their own merits, i.e., simply saying that an area needs more protection does not make it so.

In summary, we find nothing deserving "critical concern" in this area, we believe this amendment is unnecessary and, we urge you to reject it (Alternative B).

3) Dedeckera Canyon (Eureka-Saline Corridor), proposed ACEC

30-4 This amendment looks like a prelude to some kind of closure of the public road through this area which is most widely known as the Eureka-Saline Corridor. This is the only road in the area and the only vehicular route between the Eureka and Saline Valleys. From page 4-3 of the Proposed Amendments, we quote, "the open route could be a potential threat to adjacent resources." And, "any proliferation of the Eureka-Saline Corridor or irresponsible activities by users of the route could have detrimental effects on sensitive plant species in the amendment area." However, on page 3-4, it is stated, "Very little, if any, trail proliferation has occurred." Apparently, protection for the sensitive plant species July gold is the only reason this amendment is being proposed.

30-5 These questions come to mind: In an area as undeveloped and far-removed from population centers as this, does the sensitive plant species July gold not have adequate habitat in many other canyons in the Last Chance Range to assure its healthy survival? How would "the activities of users of the Eureka-Saline Corridor" be controlled if the road is to remain open (p 4-4)? Since it is openly acknowledged that no proliferation of roads or trails has occurred up until now, and there are no obvious indications that proliferation is about to occur, why make this area an ACEC? Similar logic would ban all off-highway driving anywhere in the desert for fear that someone might someday abuse resources.

We believe that a Sierra Club group drove through the Corridor within the past year, camping out, hiking to the top of various desert peaks and generally looking for evidence of human abuse. They pronounced the area to be essentially free of same. Cultural resources in the area remain uninventoried and it would seem to be reverse logic to declare an area an ACEC so that an inventory could be facilitated so that something *might* be found that would justify the area's ACEC designation. It is stated that ACEC designation would not impact wildlife.

30-6 The necessity of an ACEC designation for this area has not been adequately demonstrated. We urge the rejection of this amendment (Alternative B) now and until such time as an increase in use (and abuse) of this area is self-evident.

11) Dumont Dunes Usage Designation Changes

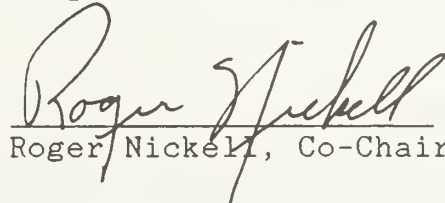
We support Alternative B, the BLM-preferred alternative.

Additional comments

The Gear Grinders 4WD Club of Ridgecrest, an affiliate of the High Desert Multiple-Use Coalition, maintains the passability of three off-highway routes of travel in the California desert. Their efforts are acknowledged by the BLM to be valid volunteer public lands work. Two of those routes are in the areas that would be affected by Amendments 2 and 3. We hope that the CDCA amendment process does not become a vehicle for the carrying out of personal vendettas against either the Gear Grinders Club or individual members of that club.

Thank you for allowing us to participate in the amendment process and for your consideration of our comments on the Proposed 1988 CDCA Plan Amendments.

Sincerely, for the membership of the High Desert
Multiple-Use Coalition,


Roger Nickell, Co-Chairman

Copies to:

- California State BLM Director Ed Haste
- California Desert Coalition

Response to High Desert Multiple-Use Coalition

Response to 30-1

Management of the ACEC will involve signing, surveying, monitoring, patrol, enforcement, and if necessary, data recovery. The preservation and protection of cultural resources will be given the highest priority. No campground is planned, and specific identification of cultural sites will be avoided.

Response to 30-2

See response to 22-1.

Response to 30-3

See response to 26-1.

Response to 30--4

See responses to 14-2, 22-3, 22-4.

Response to 30-5

Although other small populations of Dedeckera eurekaensis have been found in this region, the range is so small that each population needs protection.

Response to 30-6

See response to 22-5.

August 21, 1989

RECEIVED

Bureau of Land Management
California Desert District
Attn: Mr Gerald Hillier, District Manager
1695 Spruce Street
Riverside, CA 92507

CALIFORNIA DISTRICT

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31

Dear Mr. Hillier:

I appreciate this opportunity to submit comments regarding the "Proposed 1988 Plan Amendments to the California Desert Conservation Area Plan of 1980". Please add my name to your distribution list concerning future proposed amendments, records of decision or any similar material open for public input.

Amendment 1: New ACEC at Rodman Mountains Cultural Area

On page 2-2, under the column entitled, "Proponent's Reason for Submission", it is stated that the ACEC designation would provide special management over and above that provided by a wilderness designation. How will this be accomplished since a wilderness designation generally refers to those areas untrammled by man, without permanent improvements or the imprint of man's work is substantially unnoticeable?

31-1

I support alternative A, accepting this amendment. However, no signing should be done until sufficient monitoring and enforcement patrols can be undertaken. Until the complete ACEC management plan can be implemented, education could be accomplished through the use of pamphlets containing interpretive information. These pamphlets could be made available upon request from the appropriate Resource Area Offices.

Amendment 2: New ACEC Adjacent to Red Rock Canyon

This proposed ACEC is already regulated by numerous overlapping management tools. Last year's plan amendments changed the proposed ACEC area to Class L. Approximately 90% of the proposed ACEC is already covered by the raptor seasonal closure from February 1 to July 1 annually. The Memorandum of Understanding (MOU) with Red Rock Canyon State Park (RRCSP) and the BLM allows vehicle access in the proposed ACEC only from the 16th of each month to the end of each month. These multiple layers of control result in eliminating all public entry to 90% of the proposed ACEC for 150 days per year, while vehicle access to this same area is not allowed on 255 days out of the year.

31-2

Wildlife concerns mentioned that were not specifically addressed by the closure and MOU, are the desert tortoise and the Mojave ground squirrel.

According to the BLM brochure entitled "Desert Tortoise Natural Area", the statement is made, "From mid-June through February, most tortoises are usually deep in their burrows and are seldom seen." Additionally, the draft management plan for the Crucial Desert Tortoise Habitat in Fremont Valley and Surrounding Areas, April 89, suggests under management recommendations, Sec. III(D)(3)(a) designating a seasonal competitive and permitted ORV event closure during tortoise emergence (March 1 to June 30). Therefore, under the current area management, protection is already afforded the desert tortoise by the raptor seasonal closure dates and the additional vehicle restrictions under the MOU.

The statement that the Mojave ground squirrel **may occur** in portions of the affected area, indicates that there is insufficient data to raise it as an issue. However, the same protection that the desert tortoise enjoys from humans and vehicles applies to the Mojave ground squirrel. Unfortunately for the Mojave ground squirrel, there isn't any protection from the nesting raptors looking to feed their young.

Addressing the sensitive and listed plant concerns. Grazing animals and mineral exploration would definitely pose a threat to these plants and needs to be addressed. The Red Rock tarweed that grows in the moist canyon bottoms, is protected from human and vehicle impacts for part of winter, through spring and into summer. Seasonal run-off rearranges these canyon bottoms extensively in this area, sometimes taking it down to the underlying rock. This must have an even greater negative impact on these relic plants than do man and vehicles.

31-3 Under recreation, it is stated that there are four designated OHV routes of travel in the proposed ACEC, I assume these are the routes depicted on the accompanying map with the proposal. The BLM Red Mountain desert Access Guide #7, printed Sept. 1988 shows three routes. The BLM Jawbone/Dove Springs Desert Access Guide #5, printed May 1988 shows two routes. The Red Rock Canyon State Park handout map shows two routes. I went down and made an on-the-ground survey and found there are only two designated routes through the proposed ACEC, one through Blackrock Canyon, route EP-125 and one through part of Nightmare Gulch, route EP-123, that continues out of the gulch as EP-120. If for some reason the State Park Service has incorrectly blocked off the other three routes shown (the Nightmare Gulch route isn't shown on the proposal map), please notify them of this fact so the appropriate routes can be opened. Upon acquiring copies of the pertinent Cooperative Management Agreements (CMA) concerning the MOU area, I found that there was a CMA between the BLM, RRCSP, and the Gear Grinders 4WD Club (GG). This CMA states that the GG would be, "responsible for keeping the the approximately 6 mile long 'Blackrock Canyon' - 'Nightmare Gulch' loop road passable for 4-WD vehicles". The CMA also states that the route would be maintained to keep it in its current **primitive** condition with no upgrading, only hand tools are to be used. This CMA was never mentioned in the text of the proposal. Incidentally, the map that accompanies the Audubon Society CMA (for entering the area during

the seasonal closure to monitor nesting birds and sensitive plants) is excellent. I wish their CMA map had accompanied the proposal since they are the proponents of this amendment.

The archeological site record, CA-KER-244, 12/87, for the geoglyph/intaglio in question states that the Park rangers were mainly concerned that the intaglio might be altered by Geology field class pedestrian traffic. This intaglio is not visible from the vehicle route, and requires a slippery, sandstone climb to reach. Its actual location not being well known to the general public protects it from the casual visitor.

Summarizing, I support alternative A, accepting this amendment, to protect the area from grazing pressures and mineral exploration. However, I would suggest adjusting the ACEC boundary to coincide with the annual seasonal closure boundary since it is easily identified and will provide an open route to the area north of the proposed ACEC area. No additional vehicle/human use closures or route restrictions should be added since the existing management restrictions are completely sufficient.

Amendment 3: New ACEC at Dedeckera Canyon

31-4 First of all, I wasn't able to find Dedeckera Canyon on any of my USGS maps, BLM maps, AAA maps, DeLorme Atlas Gazetteer, etc. Next time, please put some common name, ie. Eureka Valley Dunes in paranthesis somewhere in the name. This naming convention would allow the relative location of the amendment area to be easily identified within the CDCA

31-5 On page 2-2, under the column entitled, "Proponent's Reason for Submission", it is stated that the dolomite cliffs of the proposed ACEC provide habitats for unique plant assemblages, including the Dedeckera eurekaensis. On page 4-3, under wildlife and vegetation, it states that the Eureka-Saline Corridor passes directly through the plant's habitat. I assume this actually means below, since on page 3-4 the route is described as generally following a dry wash that is bordered by steep canyon walls. Again on page 3-4, under the heading of recreation, it is stated that very little, if any trail proliferation has occurred, therefore the impact to the plant species July gold is minimal from vehicles. If however, the concern for July gold is resulting from hikers, then approximate straight-line distance from the Eureka Dunes picnic area to the proposed ACEC of just over two miles will be a problem with or without vehicle access to the corridor.

On page 4-3 it is stated that the open route could be a potential threat to adjacent resources. In what regard does a single, route threaten the adjacent resources since little or no trail proliferation has occurred. On the other hand, the route provides access to the wildlife guzzler for periodic maintenance.

I support alternative B, reject the amendment. This amendment is unnecessary since the proposed ACEC is already closed to vehicular access (except for the one route F-1794, covered under a CMA to be

maintained as a primitive 4WD route), and is currently being managed as Class L under the Interim Management Policy and Guidelines (IMP). Vehicular or human use in the canyon hasn't been shown to be a significant problem.

31-6

If it should be decided to accept alternative A, I strongly urge that the corridor remain open. Its primitive nature, the long summer heat and the remoteness of the location all effectively control the human use of the corridor for nearly half of the year.

Amendment 4: Enlarge Coyote Mountains ACEC (No. 62)

31-7

This amendment seems unnecessary since the ACEC is currently managed Class L, is closed to OHV use, and lies within a WSA recommended nonsuitable for wilderness designation. However, if it is felt that the ACEC is necessary for protection of the fossil resource, then I support alternative A, accept the amendment, with one suggestion for the amendment plan. Please set aside a reasonable size area, designated for hobby fossil collecting.

Amendments 5, 6, 7: Deletion of ACECs (No. 28, 38 and 51)

I support alternatives A, accept all of these amendments.

Amendments 8 9: changing specified area Class designation from "M" to "L"

31-8

I support alternatives A, accept amendment in both cases for the specific purpose of preventing the lands from being used for disposal sights, as well as protecting the mentioned cultural resources. However, I suggest that as stated in both amendment environmental consequence sections, that the changes in multiple use class should have little negative effect on current recreation uses.

Amendment 10: Change Class "M" areas to Class "L" in the East Mojave Scenic Area

I support alternative A, accept amendment. The Mojave Road and the East Mojave Heritage Trail should be protected from stated few road closures mentioned in the Environmental Consequences section. Also, care must be taken when making the Class L boundaries so as not to include probable rare earth deposits.

Amendment 11: Change to Class "I" and Vehicle Access to "Open" for Area Adjacent to Dumont Dunes OHV Area .

I support alternative A, accept amendment.

Amendment 12: Change Portion of Ivanpah Lake from Class "L" to Class "M"

I support alternative B, reject amendment.

Amendment 13, 14, 15: Eliminate Utility Corridors and Portions of Corridors.

I support alternatives A, accept all these amendments, with the following stipulations:

Regarding amendment 14, maintain the Mojave Road where it currently exists.

Regarding amendment 15, include the segments of the corridor road as proposed to the East Mojave Heritage Trail. However, formal maintenance the road would no longer be necessary, and could be handled under a CMA.

Amendment 16 17: Change Vehicle Access from "Limited" to "Closed" in ACEC areas (No. 57 55)

31-9 I support alternatives A, accept amendments. However, I don't understand the necessity of this vehicle access change, since the applicable ACEC plans previously closed the same areas to motorized vehicles.

Amendment 18: Prohibit grazing South of Interstate-10 in the Ford Dry Lake Allotment

I support alternative A, accept amendment.

Amendment 19: New Ephemeral Grazing Allotment Near Daggett

I support alternative C, reject amendment.

Again, thank you for this opportunity to comment concerning these amendments.

Sincerely

Wayne Rettig

Wayne Rettig

Response to Wayne Rettig

Response to 31-1

A cultural ACEC is specifically managed for its cultural values as compatible with wilderness values and could have more stringent management than a wilderness area.

Response to 31-2

See response to 22-1.

Response to 31-3

See response to 22-2.

Response to 31-4

The Plan Index Map (p. 1-2 in the E.A.) gives the general location of each amendment proposal. The map for Amendment Three in the Appendix shows that Dedeckera Canyon is close to the Eureka Dunes and at the north end of the Eureka/Saline Corridor (Route F-1794). The Canyon has been labeled on the final map in this document.

Response to 31-5

See response to 22-5.

Response to 31-6

See response to 14-2 and 22-3.

Response to 31-7

Fossil Canyon or Alverson Canyon, located at the southern end of the Coyote Mountains, is still available for fossil collection.

Response to 31-8

The class change will not have an appreciable effect on recreation use within either area.

Response to 31-9

See response to 29-7 and 29-8.



THE CALIFORNIA NATIVE PLANT SOCIETY

DEDICATED TO THE PRESERVATION OF CALIFORNIA NATIVE FLORA

24001 Martin Road
Carmel Valley, CA 93924
August 19, 1989

California Desert Office, BLM
1695 Spruce Street
Riverside, CA 92507

32

ATTN: Plan Amendments

Gentlemen,

The California Native Plant Society supports all 19 of the proposed amendments to the Desert Plan. We especially give strong support to Amendment No. 4 which would make Dedeckera Canyon an Area of Critical Environmental Concern (ACEC).

Dedeckera Canyon is a treasure trove of rare and relatively rare plants, mostly endemics. There are also archaeological sites which have not yet been investigated. The type locality of the extremely rare Dedeckera eurekaensis ("July Gold"), surrounded by dolomite cliffs, would be a tempting place to camp. However, there would be nothing but rare shrubs to burn for campfires. Even without campfires the fragile vegetation cannot for long stand up to innocent recreational impact. Dedeckera eurekaensis is already state-listed as rare, and increased protection in Dedeckera Canyon may help prevent a need for federal listing. The present designation of Wilderness Study Area provides only partial protection for the unique natural heritage represented here.

Dedeckera Canyon is worthy of ACEC status if any place ever was.

Thank you for your consideration.

Sincerely,

Suzanne Schettler
President

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1989 AUG 28 PM 3:23
FEDERAL DISTRICT
RIVERSIDE, CA

APPENDICES

APPENDIX A

RESPONSE TO U.S.D.I., BUREAU OF RECLAMATION



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

CALIFORNIA DESERT DISTRICT

1695 Spruce Street
Riverside California 92507



IN REPLY REFER TO:

1600
(CA-067.21)

Memorandum

To : Regional Environmental Officer, Bureau of Reclamation, Lower Colorado Regional Office, P. O. Box 427, Boulder City, NV 89005

From : District Manager, California Desert

Subject : Proposed 1988 Plan Amendments/Class Change in the East Mesa, Imperial County

The change from Class M to Class L, in and of itself, will not affect your proposed recharge project in the East Mesa. An environmental assessment of the proposed project would be required in either Class. However, the Class L designation highlights the potential resource conflicts and insures higher management priority and attention.

The proposed Class L designation will more accurately portray potential resource conflicts in East Mesa. Since implementation of the Desert Plan a large amount of new inventories have been conducted to determine the extent of wildlife and cultural resources in the area. The results indicate that these resources occur over a larger area, and in greater density than originally thought.

There are four wildlife species of special management concern known to occur in the East Mesa: the Flat-tailed horned lizard, the Colorado Desert fringe-toed lizard, the Yuma clapper rail, and the California black rail.

The Yuma clapper rail is a State threatened and Federally-listed endangered species. The Flat-tailed horned lizard is a BLM sensitive species and was recently upgraded from a Category 2 to a Category 1 candidate for listing by U. S. Fish and Wildlife Service as threatened or endangered. We have enclosed a copy of our recent status report for this species. The California black rail and the Colorado Desert fringe-toed lizard are Category 2 candidates for U. S. Fish and Wildlife Service listing.

The western portion of East Mesa coincides with the relict shoreline of Lake Cahuilla. The archaeological site densities now found there is nearly unparalleled in the California Desert.

Several special management designations exist within the East Mesa area because of these resource values. There are four archaeological Areas of Critical Environmental Concern (ACEC) and one large ACEC designated for wildlife values. In addition there is a Habitat Management Plan which has been prepared for the southern East Mesa area. Copies of these documents were sent to your office for review.

The Class L designation is more compatible with the identified resource sensitivity, and will allow a higher degree of control, and therefore protection, to both the cultural and wildlife resource values. Future environmental assessments for recharge projects should consider all reasonable alternatives, including pumping rather than creating spreading basins.

APPENDIX B
AMENDMENTS NOT CONSIDERED

TABLE B-1

Amendments Handled Through Administrative Action

Prelim. Amend. No.	Amendment	Proponent's Reason for Submission	Remarks
88-P-28	Close a route of travel in the Last Chance Canyon area. (Mark R. Faull, Cantil).	Access should be closed to a wash bed which goes up the Cudahy Creek drainage to protect a large population of the plant <u>Hemizonia arida</u> which is State-listed as "rare" and a Category 1 candidate for Federal listing.	A plan amendment is not necessary. The proposal can be considered in the annual route designation amendment process.
88-P-31	Change the camping regulations at Saline Valley as follows: 1) Limit the camping period to 10 days; 2) Prohibit continuance of the nudist camp; 3) Return all aircraft runways to natural state; 4) Provide full-time rangers in winter season. 5) Forbid all camping until there are adequate sanitary facilities. (Dean E. Karlberg, Ridgecrest)	This environmentally sensitive area needs adequate protection.	A plan amendment is not necessary. A Recreation Management Plan will be prepared for the Saline Valley. Public comments will be invited, with meetings probably held in Ridgecrest and Bishop.
88-P-34	Amend the Desert Plan to include a recommendation that the Big Maria Mountains be designated a Wilderness Area. (Charles Lamb, Colorado River Indian Tribes).	Since the Desert Plan was adopted in 1980, a great deal of information has come to light concerning the unparalleled cultural resources in the area, including resources of great significance to Native Americans. In addition, it has been documented that the area possesses a full range of other wilderness values, many of which were apparently not identified at the time that the 1980 Plan was adopted.	Desert District staff will continue to coordinate with the Colorado River Indian Tribes and the BLM Yuma Resource Area to protect these outstanding and sensitive cultural resources by several actions, such as: fencing, vehicle route designation and identification of alternate off-highway-vehicle areas.

TABLE B-2

Amendments Deferred

<u>Prelim. Amend. No.</u>	<u>Amendment</u>	<u>Proponent's Reason for Submission</u>	<u>BLM Remarks</u>
88-P-3	Designate an ACEC for botanical resources near Freeman Junction (junction of State Highways 178 and 14). (Mark Faull, Ridgecrest)	An ancient creosote clone measuring 8,838 meters in diameter, which is probably over 9,000 years old, is threatened by off-highway vehicle use and by commercial harvesting of creosotes. Special protection is needed for this outstanding and irreplaceable plant.	The BLM will collaborate with the California Dept. of Fish & Game in a study of creosote clones throughout the Calif. Desert District and will develop criteria for evaluating this resource in future management decisions. Designation of ACEC status for the most outstanding and threatened clones will be considered in future amendment processes.
88-P-15	Remove all grazing in the East Mojave National Scenic Area west of Kelbaker Road and in the South Providence Mountains (i.e., south of Foshay Pass). (Sierra Club).	The largest herds of bighorn sheep in the Mojave Desert are in the Old Dad/Kelso Peak area, Granite Mountains and Marble Mountains. Domestic stock grazing in the bighorn habitat represents a very real disease threat to the bighorn herds. Knowledge of this disease threat is based on research and publications since 1980.	The relationship between domestic stock grazing and bighorn habitat will be evaluated in an upcoming study. If stock grazing is shown to be a potential threat to bighorn in the EMNSA, this amended proposal will be presented in a later amendment process.
		The area described does not contain all the bighorn habitat, but certainly the major herds. The South Providence is included because bighorn sheep regularly migrate between the Granite Mountains and the South Providence. It is our understanding that presently there is no grazing allotment in the Marble Mountains, but there are certainly cattle there. It is thought by the BLM staff that these are drift cattle from north of I-40. Not having grazing south of Foshay Pass would substantially reduce the drift problem.	

TABLE B-2 (continued)

Amendments Deferred

Prelim. Amend. No.	Amendment	Proponent's Reason for Submission	BLM Remarks
88-P-17 88-P-18	Revise and clarify the portion of the Livestock Grazing Element in the CDCA Plan relating to grazing within Desert Tortoise habitat.	The CDCA Plan established procedures to allow grazing within highly crucial and crucial habitat for the desert tortoise with the goal of maintaining or enhancing tortoise population levels. Data gathered on eight study plots in the western Mojave clearly show that these goals are not being met. The population problems identified are not unique to a specific grazing allotment but point to the need for a change in the procedures in all allotments.	Decisions on grazing in Desert Tortoise habitat will utilize much of the information obtained in redefining tortoise habitat categories (see amendment proposal P-20). For this reason, this amendment was carried over to the 1989 amendment cycle.
88-P-19	Change the grazing classification of the Pilot Knob Allotment from ephemeral to ephemeral/perennial. (Billy and Ann Mitchell, Barstow.)	We would like to change from a "stocker" operation to a cow/calf operation and believe that this request was made a few years ago.	This proposal will be considered as soon as the Allotment Management Plan is completed. The AMP is currently under preparation.
88-P-20	Define three categories of Desert Tortoise habitat.	In 1987, the BLM Chief of the Division of Wildlife and Fisheries in the Washington Office issued a report entitled "Management of Desert Tortoise Habitat." That report defined three categories of tortoise habitat and identified criteria for each category. Instructions from the Director of BLM (Information Bulletin 88-33) directed Bureau offices to implement the recommendations contained in the report. The designation of these categories will set a backdrop for a consistent Bureau-wide management program for the Desert Tortoise.	The significant impact this amendment may have on grazing, utility corridors, and other land surface-disturbing activities will require additional amendments in order to assure consistency between the Desert Plan's multiple use class designations and categories of Desert Tortoise habitat. Because of time constraints, it was decided to carry the proposal over into the 1989 amendment cycle to allow additional time for staff research and public input.

TABLE B-2 (continued)

Amendments Deferred

<u>Prelim. Amend. No.</u>	<u>Amendment</u>	<u>Proponent's Reason for Submission</u>	<u>BLM Remarks</u>
88-P-27	Remove an area of creosote clones from the Dove Springs Open Area. Change vehicle access from "open" to "closed" and the Multiple Use Class from "I" to "M" or "L". The colony of clones is located west of Highway 14 in the Red Rock Canyon vicinity. (Mark Faull, Ridgecrest)	The existence of this clone colony was not known at the time of the creation of this Open Area. The estimated age of clones is 2000 to 4000 years. Diameters of over 30 feet are found here. Special protection is needed for this clone site, so that we may pass on this heritage to future generations.	The BLM will collaborate with the California Dept. of Fish and Game in a study of creosote clones throughout the Calif. Desert District and will develop criteria for evaluating this resource in future management decisions. Designation of ACEC status or other protective actions for the most outstanding and threatened clones will be considered in future amendment processes.

TABLE B-3

Amendments Dropped

<u>Prelim. Amend. No.</u>	<u>Amendment</u>	<u>Proponent's Reason for Submission</u>	<u>Remarks</u>
88-P-8	Modify boundaries of ACEC #24, Bedrock Spring. (BLM, Ridgcrest RA)	The original boundary is not physically definable, making management difficult. The proposed boundary is more easily identifiable on the ground. It will also incorporate petroglyphs, which are excluded by original boundary.	The Draft ACEC Plan recommended the change in boundary. Following public review, it was concluded that the sensitive cultural resources could be protected by increased signing and fencing, and that a change in boundary was not necessary.
88-P-10	Modify the boundary of the East Mojave National Scenic Area in the Mountain Pass region to remove four sections containing mining properties. (Eugene Dambold and Jerry Lipscomb)	Several mining claims are just inside the boundary of the Scenic Area in the Kokoweef area. Claimholders have substantiated the presences of valuable resources on their claims (gold, silver, and platinum) but have not been able to interest mining companies about leasing because they are inside the Scenic Area.	Regulations on mineral exploration and development are not affected by the East Mojave National Scenic Area designation.
88-P-32	Modify the eastern boundaries of the Little Lake Canyon (CDCA-197) and Owens Peak (CDCA-159) recommended wilderness areas between COSO Junction and Freeman Junction to a minimum of 100 feet west of the centerline of the westernmost aqueduct (i.e., First or Second Aqueduct) of the Los Angeles Aqueduct System (LA Dept. Water and Power).	In 1906, Congress directed the Secretary of Interior to grant the L.A. Dept. of Water & Power all necessary rights-of-way, not to exceed 250 feet in width, over and through national forest lands for purposes of constructing, operating, and maintaining the LA Aqueduct System as necessary. The boundaries of the two wilderness study areas overlap, at several locations, the existing LAA System. Such inclusion would have a significant impact by limiting the Department's ability to operate and maintain the two aqueducts. It is	A Plan Amendment is not required. Since the LA Aqueduct System existed prior to passage of the Federal Land Policy and Management Act of 1976, these facilities will not be affected by wilderness designation. The L.A. Dept. of Water & Power may perform whatever maintenance is needed.

TABLE B-3 (continued)

Amendments Dropped

Prelim. Amend. No.	Amendment	Proponent's Reason for Submission	Remarks
(88-P-32 cont.)		imperative that the Department continue to have complete access at all times to the LAA System for repair in emergency situations as well as for routine maintenance	
88-P-33	The Bureau should undertake and incorporate a secondary or alternative wilderness suitability for California wilderness Study Areas; it should utilize widely solicited extensive public comment and new scientific data from private, city county, and state studies (Frederic C. Johnson, Tecopa, CA)	This call for additional inventory is prompted by recent implications and concerns of many public factions that presently designated unsuitable and suitable wilderness areas do no represent the best utilization of all the factual data that has become available over the last 8 years. Although it is the Bureau's policy not to change WSA boundaries, no matter how suitable or unsuitable, this should not negate the presentation of a comprehensive compilation of new data in the form of an alternative proposal to the Secretary of Interior and Congress. The inventory of public lands is an ongoing complex process which should be as complete as possible before land use designations such as wilderness are legislated.	The Bureau is transmitting to Congress all information developed since 1980 on energy and mineral resources in Wilderness Study Areas. We are pointing out locations of significant changes. Congressional deliberation will consider this new information.

