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United States Department of the Interior
Bureau of Land Management
California Desert District

June 1993



1989/1990 California Desert Conservation Area Plan Amendments Decision Record



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BLM Mission Statement

The Bureau of Land Management is responsible for the balanced management of Public Lands and resources and their various values so that they are considered in a combination that will best serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield; a combination of uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources. These resources include recreation, range, timber, minerals, watershed, fish and wildlife, wilderness, and natural, scenic, scientific and cultural values.

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DECISION RECORD

1989/1990 CALIFORNIA DESERT

CONSERVATION AREA PLAN AMENDMENT

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Department of Interior
Bureau of Land Management
California Desert District
Riverside, California

April 1993

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DECISION RECORD/FINDING

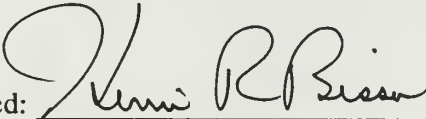
Decision: It is my decision to amend the *California Desert Conservation Area Plan* by approving the 19 plan amendments described in the "Proposed Amendment" section of this decision record. Further, I approve as a plan clarification the deletion of special area designations listed in the California Desert Conservation Area Plan. The rationale for each designation's deletion is given in Appendix A.

The 1989-90 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 of Environmental Quality regulations for implementing the National Environmental Policy Act (40 CFR 1500).

Alternatives: Of the 19 proposed amendments, 18 proposed amendments had two alternatives; one proposed amendment (Amendment #1) had five alternatives. For each amendment, a BLM preferred alternative was indicated and analyzed along with the other alternative(s) in an Environmental Assessment distributed for public review. As a result of public comment and internal review of the proposed amendments, the following change was made: the preferred amendment for Amendment #4, Halloran Wash ACEC has been changed from deleting the ACEC designation to No Action, i.e., continue the ACEC designation. The initial proposal to delete the Halloran Wash ACEC designation was based on available information. An evaluation of public comment indicated that the proposed decision to delete the ACEC designation was premature without further survey and evaluation of extant cultural resources. Pending such survey and evaluation the preferred alternative for Amendment #4 is No Action, continuation of the Halloran Wash ACEC.

Public Review and Scoping: A Notice of Intent to conduct a Desert Plan review was published in the Federal Register (January 12, 1989), and an invitation for proposals was sent to the Desert Plan mailing list (February 8, 1989) with a final date for submitting proposals being March 10, 1989. Thirty-one amendments were proposed by the public and the BLM staff. They were screened by BLM management and by the California Desert District Advisory Council to determine which should be considered at this time and which should be deferred, dropped, or handled by an administrative action (see Appendix B). Nineteen proposals were accepted for consideration (see Map 1 for regional location). The proposed plan amendments and environmental assessment were distributed for a sixty day public review period which concluded on December 16, 1991. The public review resulted in sixteen comment letters. All letters and responses to specific comments are presented in the "Comment and Response" section of this Decision Record.

Finding of No Significant Impact: Based on analysis of potential environmental impacts contained in the environmental assessment, it has been determined that impacts are not expected to be significant and an environmental impact statement is not required.

Recommended:  4/15/93
District Manager Date

Approved:  4/27/93
State Director Date

TABLE S-1

SUMMARY COMPARISON OF "NO ACTION" AND PREFERRED ALTERNATIVE

<u>Resource</u>	<u>Unit of Measure</u>	<u>No Action</u>	<u>Preferred Alternative</u>	<u>Percent Change</u>	<u>New % of Desert</u>
Multiple Use Class					
C*	Acres	2,100,000	2,100,000	0.00	15.9
L	Acres	6,151,440	6,150,960	-0.01	51.4
M	Acres	3,142,410	3,154,950	0.40	26.4
I	Acre	528,150	532,410	0.81	4.4
Unclassified	Acres	249,000	232,680	-6.55	1.9
<u>Total</u>		<u>12,171,000</u>	<u>12,171,000</u>		<u>100.0</u>
Vehicle Access					
Open	Acres	513,150	517,410	0.83	4.3
Limited	Acres	9,437,460	9,450,000	0.14	77.3
Closed	Acres	1,969,390	1,969,390	0.00	16.4
Undesignated	Acres	251,000	234,200	-6.7	2.0
<u>Total</u>		<u>12,171,000</u>	<u>12,171,000</u>		<u>100.0</u>
ACECs					
Added	Number	0	10		
	Acres	0	177,062		
Expanded	Number	0	2		
	Acres	0	26,150		
Deleted**	Number	0	1		
	Acres	0	-1,920		
Net Change	Number	0	9		
	Acres	0	198,800		
Livestock Grazing					
Ephemeral Allotments	Number	19	18		
	Acres	1,315,820	1,278,020		
Ephemeral/Perennial Allotments	Number	25	25		
	Acres	3,036,270	3,036,270		
Perennial Allotments	Number	14	14		
	Acres	720,520	720,520		

*MUC "C" acreage measurements were refined during final wilderness study reporting.

**Mopah Springs ACEC will be incorporated into the Turtle Mountains NNL/ACEC.

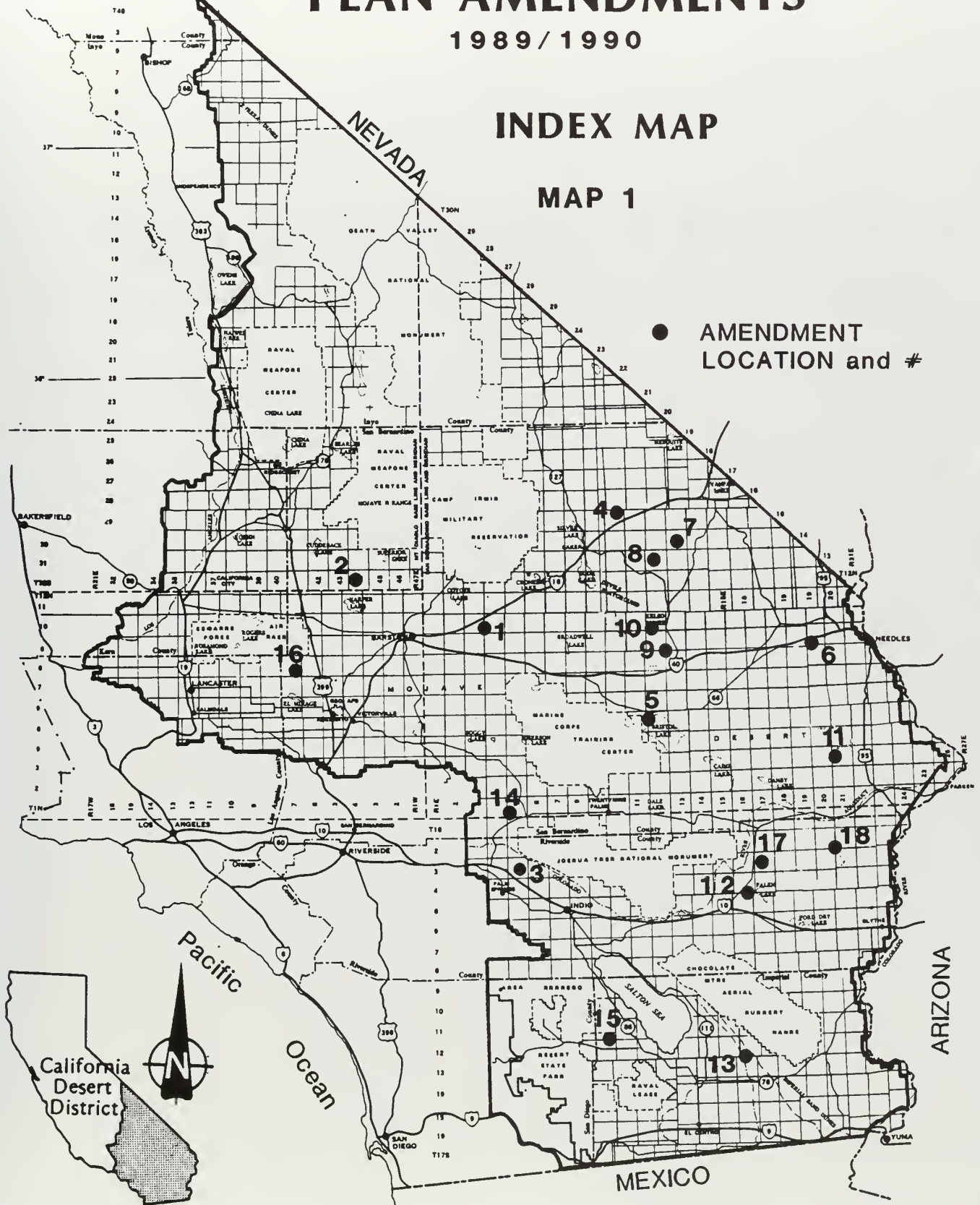
CALIFORNIA DESERT CONSERVATION AREA PLAN AMENDMENTS

1989/1990

INDEX MAP

MAP 1

● AMENDMENT
LOCATION and #



Plan Amendment Decision

**AMENDMENT ONE
MANIX PALEONTOLOGICAL AREA ACEC**

Proposed Amendment

Designate as the Manix Paleontological Area ACEC 2,950 acres of public lands 25 miles east of Barstow along the Mojave River containing known fossil sites. Management of the ACEC will focus on the preservation and protection of the scientific and research values associated with the paleontological resources found in the area. Existing authorized users and uses will be allowed to continue, including grazing, recreation, and mining. Currently authorized or designated access routes shall remain open and available for use. Any modifications, expansions, and/or maintenance of facilities by authorized users will require review and approval by the BLM.

Other Alternatives Considered

Alternative A: Designate as the Manix Paleontological Area ACEC 3,900 acres of public land and 1,700 acres of private land. Management would be the same as for the Proposed Amendment.

Alternative B: Designate as the Manix Paleontological Area ACEC 3,900 acres of public lands. Management would be the same as for the Proposed Amendment.

Alternative D: Do not designate the Manix area as an ACEC, but change the multiple-use class of the 3,900 acre area of public land from "M" to "L". Management would be in accordance with multiple-use class "L" guidelines.

Alternative E: No Action. Continue to manage the area in accordance with multiple-use class "M" guidelines.

Decision

Adopt the Proposed Amendment.

Rationale

The paleontological resources found in the Manix area meet the ACEC criteria of relevance and importance and warrant special management attention. The 2,950 acre ACEC contains most of the known Pleistocene paleontological resources, is adequate to protect the major resource values, and minimizes impacts to other users. Peripheral Manix Lake deposits are excluded from the ACEC.

Implementation Needs

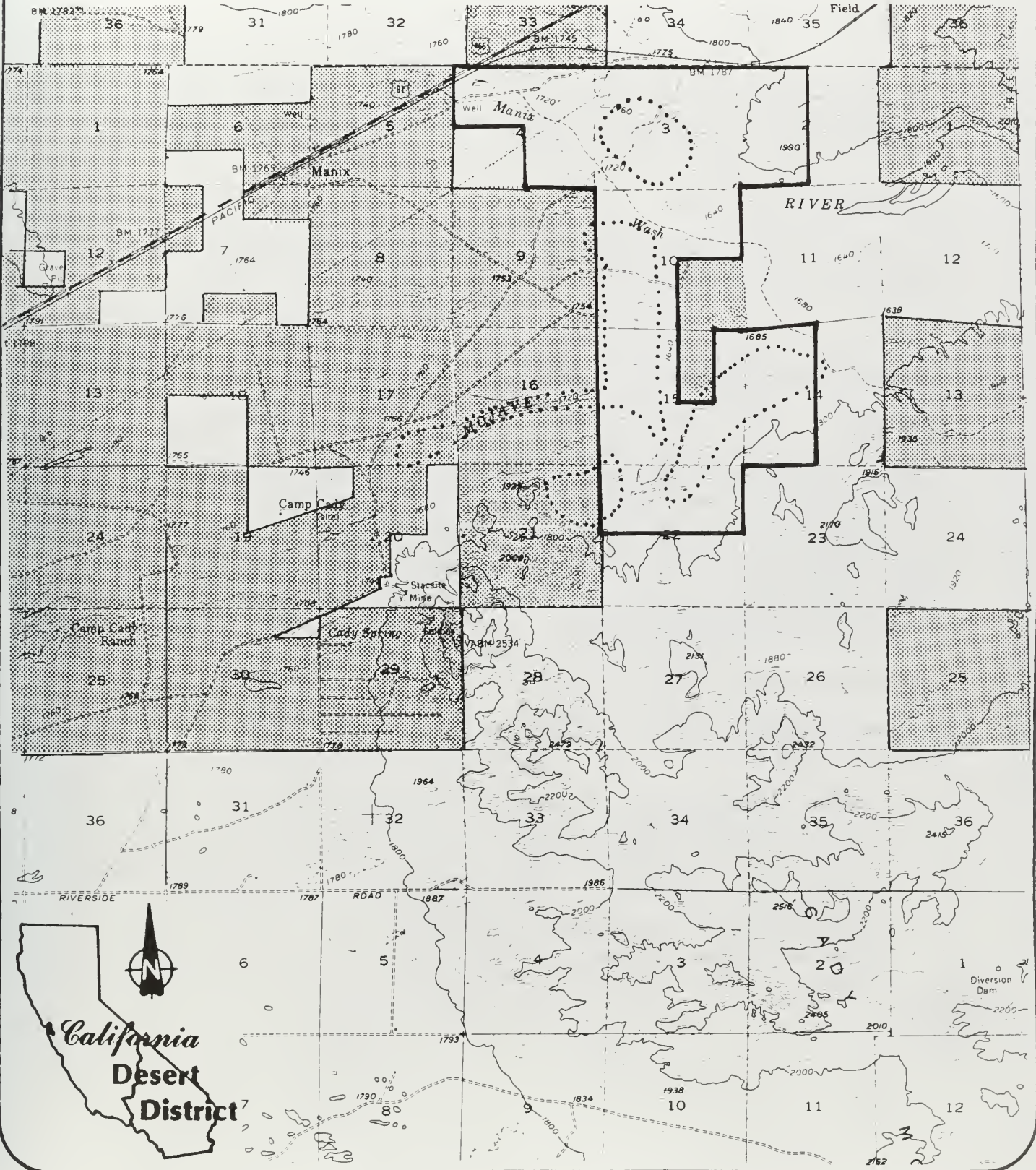
Prepare ACEC management plan.

NEW ACEC at MANIX

- ACEC Boundary
- ▨ Private Land
- Public Land



Known Paleontological Resources



**AMENDMENT TWO
BLACK MOUNTAIN CULTURAL AREA ACEC**

Proposed Amendment

Enlarge the 5,120-acre Black Mountain Cultural Area ACEC (#35) by adding 32,480 acres (17,920 acres public lands, 13,120 acres private lands, and 1,440 acres State lands). The ACEC will be managed in accordance with the *Black Mountain Cultural Area ACEC Management Plan (1988)* which prescribed special management measures to protect cultural resources in the enlarged area.

Other Alternatives Considered

No Action: Continue to manage the area surrounding the existing ACEC in accordance with multiple-use class "L" guidelines.

Decision

Adopt the Proposed Amendment.

Rationale

In preparing a management plan for the Black Mountain Cultural Area ACEC, Bureau archaeologists found that extraordinary cultural resources extended well beyond the original ACEC boundary, including but not limited to extensive assemblages of petroglyphs, lithic workshops, locations suitable for surface occupation sites and game hunting, and a major transportation corridor used by prehistoric peoples. The management plan, completed in 1988, proposed enlargement of the ACEC boundary. The cultural resources in the enlarged area meet the ACEC criteria of relevance and importance and warrant special management attention.

Implementation Needs

Implement the actions prescribed in the 1988 management plan for the Black Mountain Cultural Area ACEC as follows:

- * Acquire, through exchange, State and private lands within the expanded ACEC boundary.
- * Monitor and enforce closure of selected routes of travel.
- * Use barriers and signs to direct vehicles away from sensitive cultural resources
- * Research cultural resources through survey and potential data recovery (when necessary).
- * Increase ranger patrol.
- * Nominate properties to National Register of Historic Places
- * Withdraw significant rock art sites from mineral entry (approximately 500 acres).

AMENDMENT 2

BLACK MOUNTAIN ACEC
Enlarge Boundary

R46E



Existing ACEC

Proposed Boundary

Private Land

Public Land

R45E

R44E

T31S

T32S

MDM

SBM

T12N

R2W

T11N

R3W

California
Desert
District

**AMENDMENT THREE
COACHELLA VALLEY FRINGE-TOED LIZARD PRESERVE RNA/ACEC**

Proposed Amendment

Combine the 1,694-acre Edom Hill-Willow Hole ACEC (#79) with the Coachella Valley Preserve (7,000 acres) and the Whitewater Floodplain (Indian Avenue) Preserve (1,230 acres) to form the 9,924-acre Coachella Valley Fringe-Toed Lizard Preserve RNA/ACEC. Management of the ACEC will primarily focus on the protection and recovery of the Coachella Valley Fringe-Toed Lizard (Uma inornata), a Federally-listed "threatened" species and a State-listed "endangered" species.

Other Alternatives Considered

No Action: Maintain the Edom Hill-Willow Hole Preserve ACEC and manage the three areas in accordance with the *Coachella Valley Preserve System Management Plan (1986)*.

Decision

Adopt the Proposed Amendment.

Rationale

The consolidation of the two preserves and an existing ACEC, creating a single management entity for the Coachella Valley Fringe-Toed Lizard (CVFTL), will improve management of the habitat for this Federally listed species. It also implements recommendations in the *Habitat Conservation Plan (1985)* and the *Coachella Valley Preserve System Management Plan (1986)*. The three areas contain the ecosystems needed to support the CVFTL as well as other sensitive plants and animals including the Least Bell's Vireo which is Federally and State-listed as endangered and two Federal candidate plant species, archaeological resources and cultural values. The resource values in the three areas meet the ACEC criteria of relevance and importance and warrant special management attention.

Implementation Needs

Update and implement the management plan for the ACEC, including the following actions:

- * Eliminate the OHV trespass problem by fencing, signing, enforcement of road closures, patrolling and public education.
- * Remove exotic plants, including salt cedar (Tamarix-pentandra) and athel (Tamarix aphylla) by cutting and application of herbicides; monitor Russian thistle and consider removal; all herbicide use will be conducted in accordance with BLM vegetation management policies and with site-specific environmental analysis.
- * Remove abandoned buildings.
- * Develop hiking and equestrian trails.
- * Prepare and distribute educational brochures.
- * Monitor rare plant and animal species.

**AMENDMENT FOUR
HALLORAN WASH ACEC**

Proposed Amendment

No Action: Maintain the Halloran Wash ACEC (#29) designation and continue to manage the area in accordance with ACEC management guidelines.

Other Alternatives Considered

Delete the Halloran Wash ACEC (#29).

Decision

Adopt Proposed Amendment.

Rationale

This area was originally designated as an ACEC in recognition of its potential to yield data pertaining to Anasazi turquoise mines, which had been found on adjacent lands. No such resources have been found on public lands within the ACEC. In 1982 the ACEC was expanded to include an area thought to contain petroglyphs, however, recent on-site examination showed that the petroglyphs are on private land outside the ACEC boundary while other petroglyphs are partially on public land. A proposal to eliminate the ACEC designation was based on evidence that the resources within the ACEC boundary did not meet the criteria of relevance and importance. Internal and external concerns were raised regarding the adequacy of the data upon which we were basing our recommendation to delete the ACEC designation. It was decided that before reconsidering the ACEC designation, further survey within the ACEC and evaluation of cultural resources on public land are necessary to determine if the values warrant continuation under ACEC management.

Implementation Needs

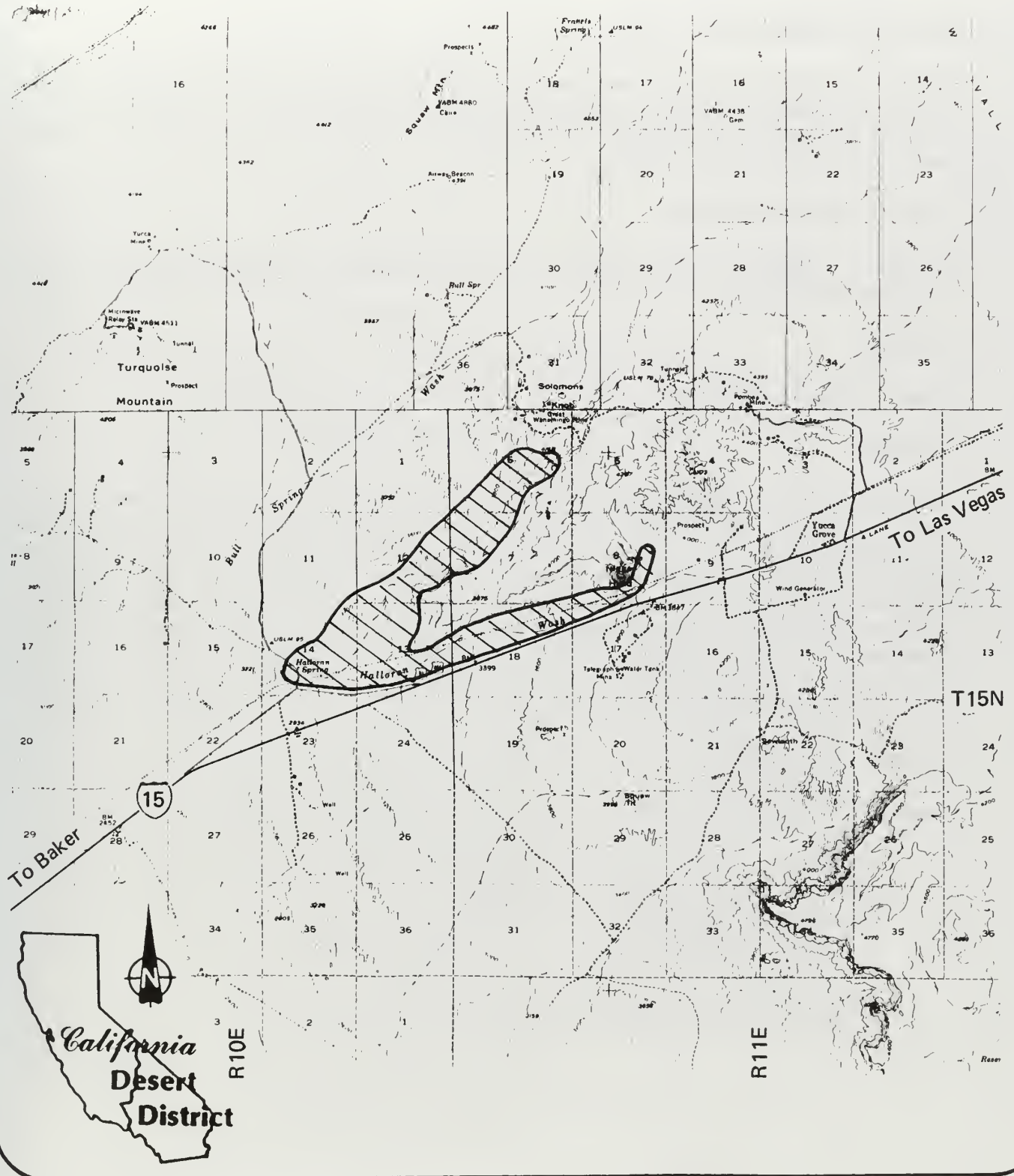
Conduct complete survey and evaluation of cultural resources in the Halloran Wash ACEC.

HALLORAN WASH

ACEC (#29)



ACEC Area



**AMENDMENT FIVE
AMBOY CRATER NATIONAL NATURAL LANDMARK ACEC**

Proposed Amendment

Designate the Amboy Crater and its surrounding areas, located in San Bernardino County 2.5 miles west of the community of Amboy, as a National Natural Landmark ACEC. The total area of the ACEC is 640 acres. The area would be managed under the Amboy Crater National Natural Landmark Management Plan (1987).

Other Alternatives Considered

No Action: Continue to manage the area in accordance with the National Natural Landmark Management Plan (1987).

Decision

Adopt Proposed Amendment.

Rationale



Prior to the passage of FLPMA, the Bureau of Land Management used a variety of designations to identify areas with unique or outstanding values. To eliminate the proliferation of terms, California BLM developed the ACEC "umbrella" concept, under which all special area will be designated as ACECs provided they meet the ACEC criteria. Special areas in the CDCA have been reviewed to determine their eligibility for ACEC designation. In 1987 the BLM evaluated the 5,760 acre area which included the Amboy Crater cinder cone and the entire lava flow. It was determined that the significant part of the area was the cinder cone and the area immediately surrounding it. The 640 acre area includes the most significant resources associated with the Amboy Crater. These resources meet the ACEC criteria of relevance and importance and warrant special management attention.

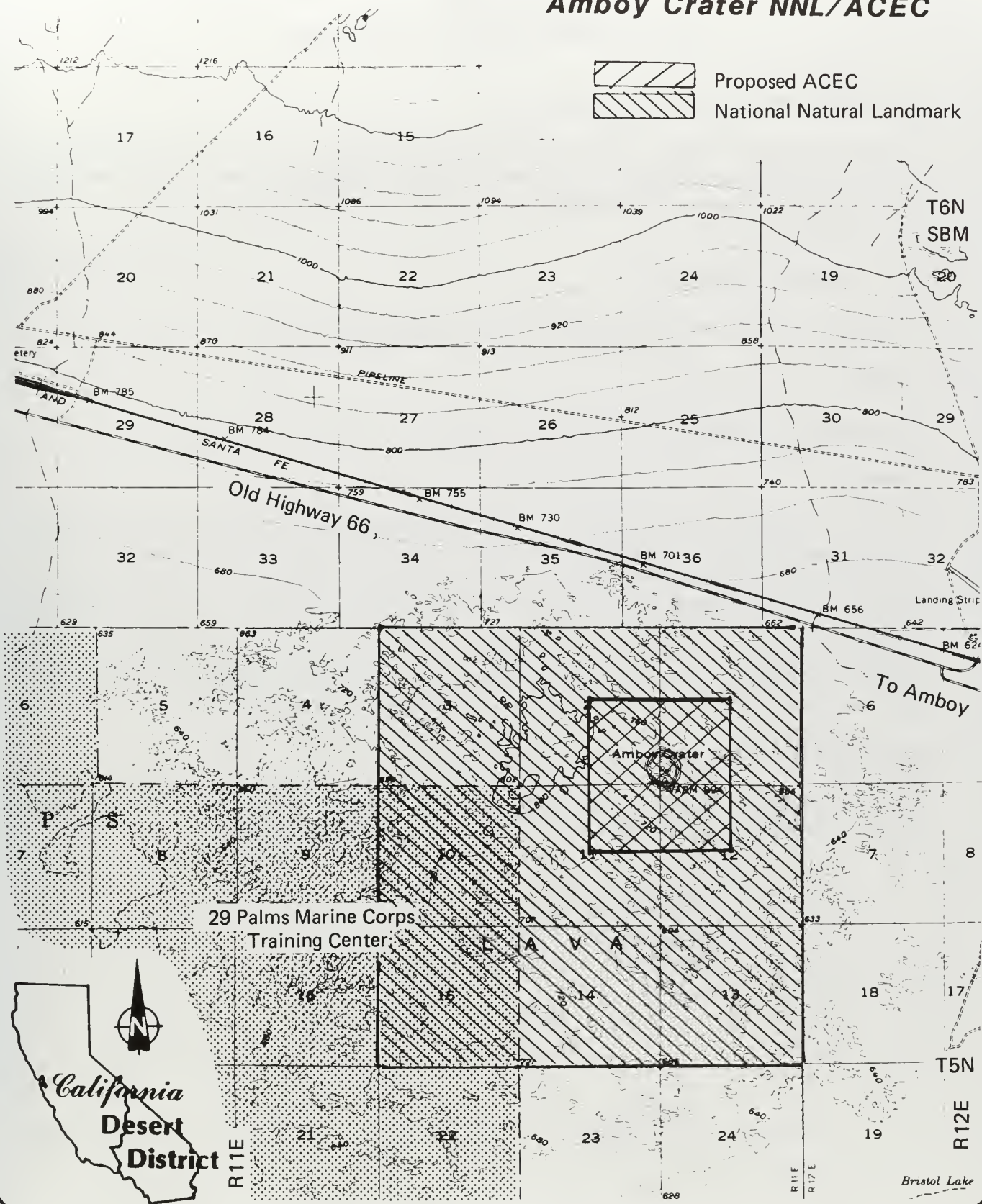
Implementation Needs

Implement the Amboy Crater National Natural Landmark Management Plan, as follows:

- * Withdraw entire area from mineral entry under the Mining Law of 1872.
- * Enforce closure of the area to firearm use.
- * Provide interpretive signing.
- * Construct small day-use facility.
- * Prevent vehicle access beyond the day use site.
- * Restore north face of cinder cone.
- * Provide interpretive trail to the top of the cone.

Amboy Crater NNL/ACEC

 Proposed ACEC
 National Natural Landmark



29 Palms Marine Corps Training Center



**AMENDMENT SIX
BIGELOW CHOLLA RNA/ACEC**

Proposed Amendment

Designate the 80-acre Bigelow (Teddy Bear) Cholla as a Research Natural Area (RNA)/ACEC. The area lies on both sides of Interstate 40 in the Sacramento Mountains adjacent to land owned by the University of California as part of its Natural Reserve System. The area shall be managed primarily for research purposes.

Other Alternatives Considered

No Action: Continue management of area under multiple-use class "M".

Decision

Adopt Proposed Amendment

Rationale

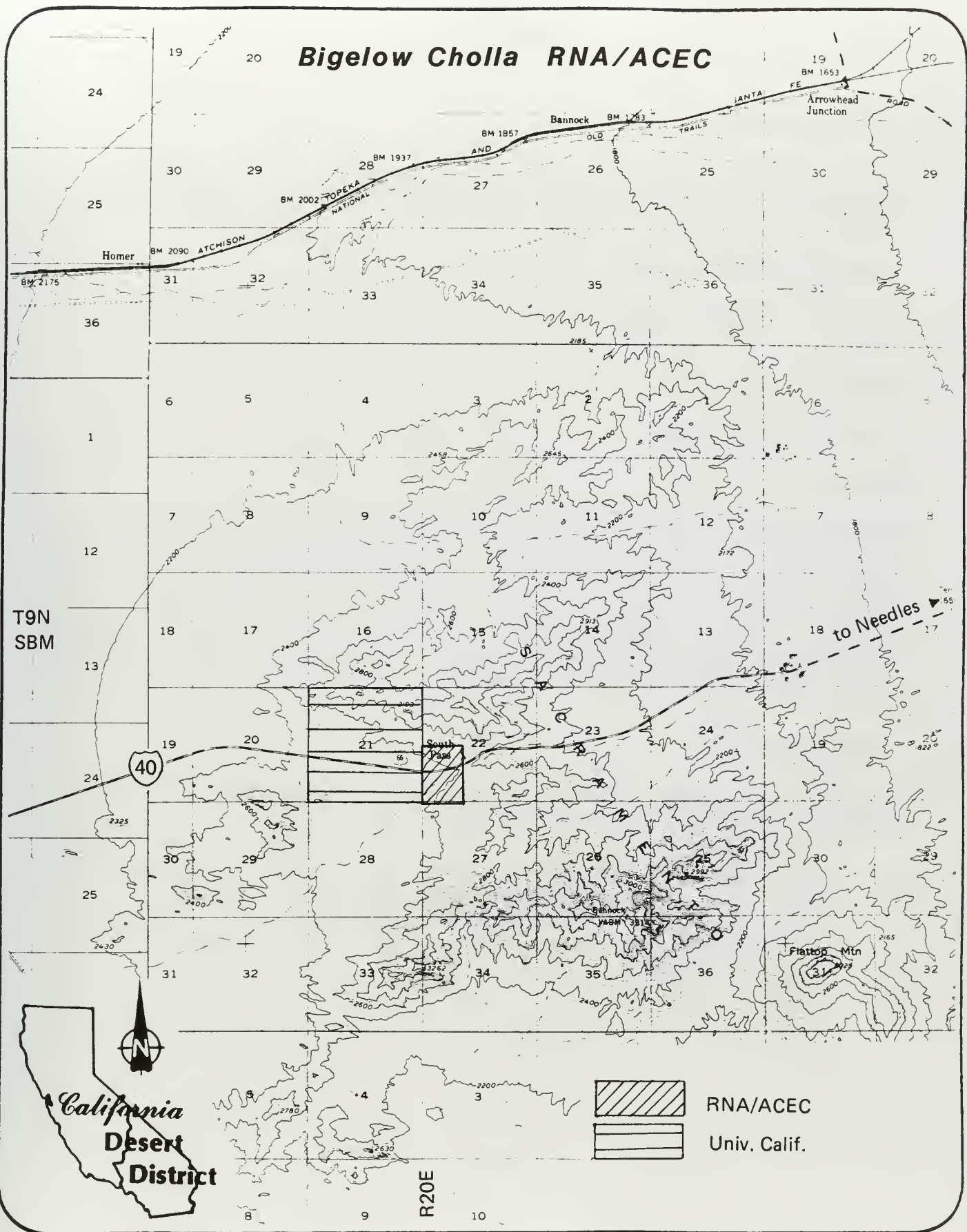
Prior to the passage of FLPMA, the Bureau of Land Management used a variety of designations to identify areas with unique or outstanding values. To eliminate the proliferation of terms, California BLM developed the ACEC "umbrella" concept, under which all special areas will be designated as ACECs provided they meet the ACEC criteria. Special areas in the CDCA have been reviewed to determine their eligibility for ACEC designation. The Bigelow Cholla was managed as a Natural Area. It contains the northern-most population and the densest-known concentration of Bigelow Cholla in the CDCA. The resource values have been determined to meet the ACEC criteria of importance and relevance, and the resources and values require special attention.

Implementation Needs

Develop a Memorandum of Understanding with the University of California to address cooperative research activities in the area and to serve as the ACEC management plan.

AMENDMENT 6

Bigelow Cholla RNA/ACEC



	RNA/ACEC
	Univ. Calif.

AMENDMENT SEVEN CIMA DOME ONA/ACEC

Proposed Amendment

Designate 18,640 acres of public land encompassing the Cima Dome as an Outstanding Natural Area (ONA)/ACEC. The ACEC shall be managed to protect the outstanding Joshua Tree forest and other important resources.

Other Alternatives Considered

No Action: Continue to manage area as specified in the *East Mojave National Scenic Area Plan (1988)*.

Decision

Adopt Proposed Amendment.

Rationale

Prior to the passage of FLPMA, the Bureau of Land Management used a variety of designations to identify areas with unique or outstanding values. To eliminate the proliferation of terms, California BLM developed the ACEC "umbrella" concept, under which all special areas will be designated as ACECs. Special areas in the CDCA have been reviewed to determine their eligibility for ACEC designation. Cima Dome designation meets the ACEC criteria of importance and relevance, and the resources and values require special attention. The incorporation of the ONA into an ACEC will provide additional visibility to ensure its protection under the existing *East Mojave National Scenic Area Plan (1988)*.

Implementation Needs

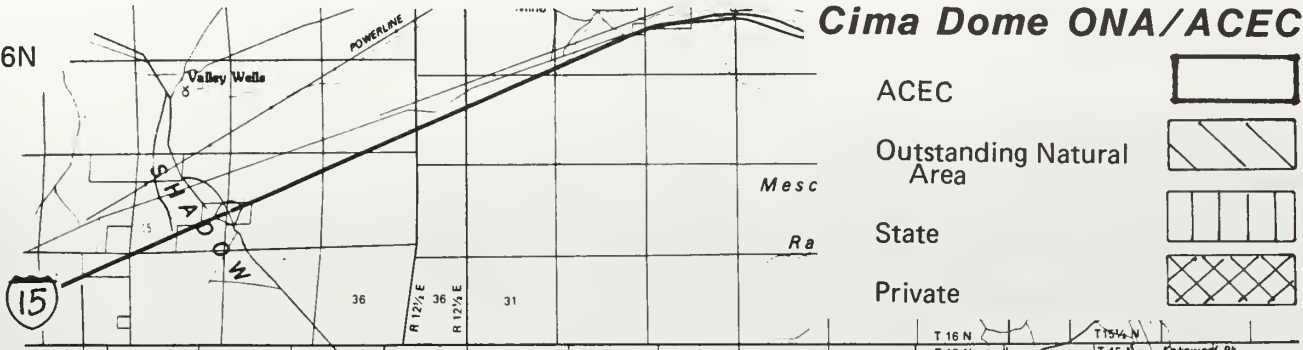
Implement management actions prescribed in the East Mojave National Scenic Area Plan which are applicable to Cima Dome, including the following:

- * Maintain the withdrawal from mineral entry under the mining laws on 18,320 acres.
- * Withdraw the remaining 320 acre Wildcat Butte area from mineral entry.
- * Acquire one section of State land within the ACEC boundary through exchange.
- * Close several routes to protect natural values in the Joshua Tree woodland.
- * Test springs routinely.
- * Develop and maintain hiking trails through the ACEC.

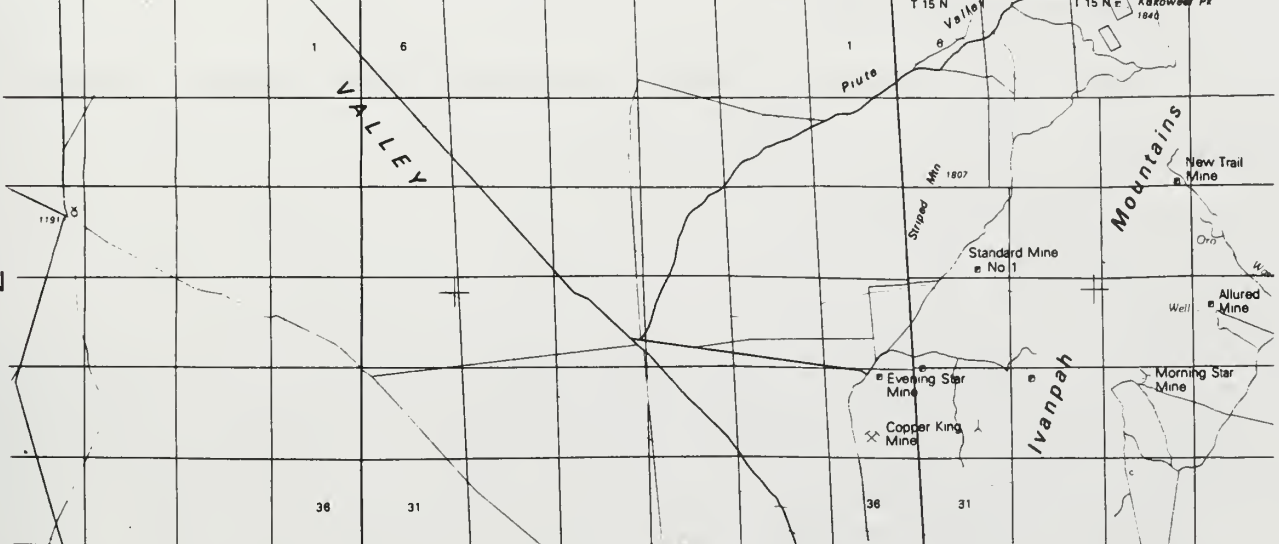
AMENDMENT 7

Cima Dome ONA/ACEC

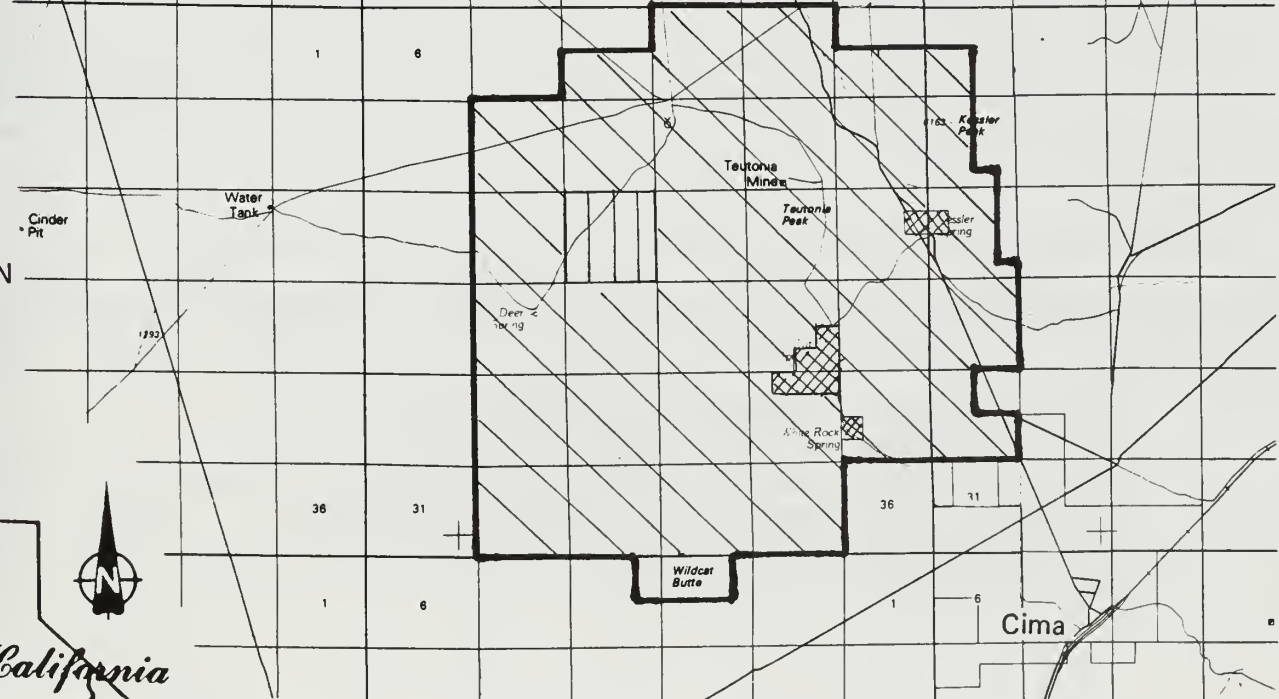
T16N



T15N



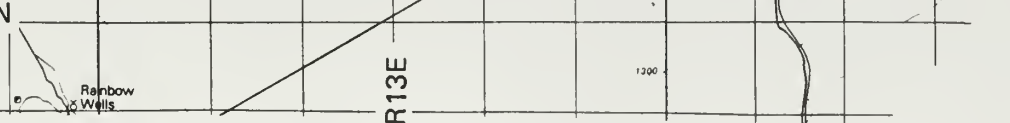
T14N
SBM



T13N

R12E

R13E



AMENDMENT EIGHT CINDER CONES NNL/ACEC

Proposed Amendment

Designate the 24,320-acre Cinder Cones NNL and 640 acres adjacent to the east border as a National Natural Landmark (NNL)/ACEC. The ACEC shall be managed for the protection of the volcanic cones and other geologic and cultural resources in the vicinity.

Other Alternatives Considered

No Action: Continue to manage area under the *East Mojave National Scenic Area Plan (1988)*.

Decision

Adopt Proposed Amendment.

Rationale




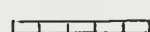
Prior to the passage of FLPMA, the Bureau of Land Management used a variety of designations to identify areas with unique or outstanding values. To eliminate the proliferation of terms, California BLM developed the ACEC "umbrella" concept, under which all special areas will be designated as ACECs. Special areas in the CDCA have been reviewed to determine their eligibility for ACEC designation. The Cinder Cones area was designated as a National Natural Landmark in 1975. Part of the area had previously been designated an Outstanding Natural Area. The resources in the area, including extensive lava flows interspersed with numerous dormant volcanic cones which are noted for their petroglyph-covered basalts, meet the ACEC criteria of importance and relevance, and the resources and values require special attention. The incorporation of the ONA into an ACEC will provide additional visibility to ensure its protection under the existing *East Mojave National Scenic Area Plan (1988)*.

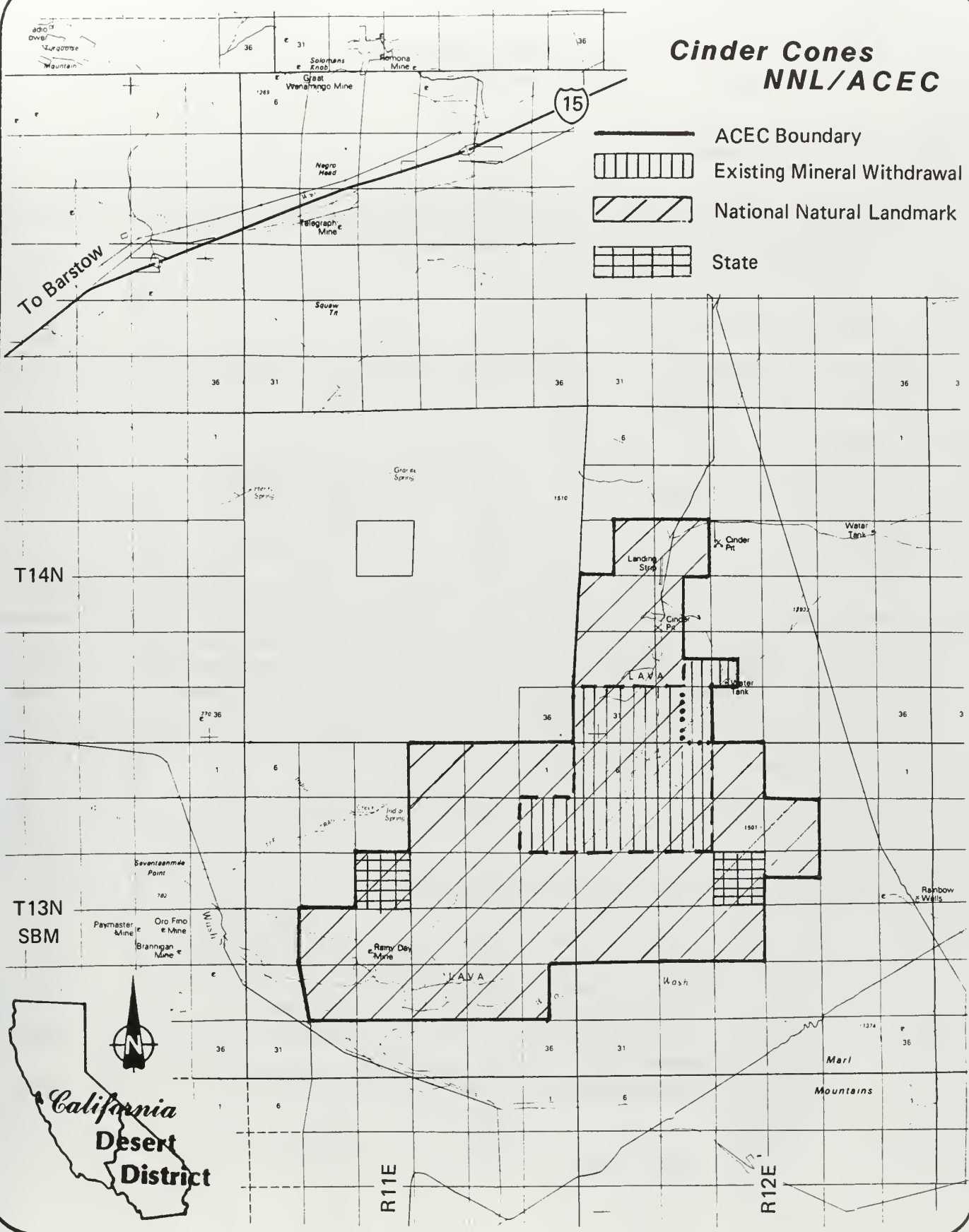
Implementation Needs

Implement management actions prescribed in the East Mojave National Scenic Area Plan which are applicable to Cinder Cones, including the following:

- * Maintain withdrawal from mineral entry on 4,800 acres.
- * Withdraw from mineral entry an additional 15, 320 acres.
- * Acquire 1,280 acres of state land through exchange within the proposed ACEC boundary.
- * Close several vehicle routes to protect cultural and natural values.
- * Limit the extraction of mineral materials (sand, gravel, cinders) to the amount required by local governments.

**Cinder Cones
NNL/ACEC**

-  ACEC Boundary
-  Existing Mineral Withdrawal
-  National Natural Landmark
-  State



AMENDMENT NINE GRANITE MOUNTAINS RNA/ACEC

Proposed Amendment

Designate 6,680 acres in the Granite Mountains as a Research Natural Area (RNA)/ACEC. The public land in the area is intermingled with lands owned by the University of California (UC) and is jointly managed by the BLM and UC for research and protection of an unusually diverse range of vegetation and wildlife.

Other Alternatives Considered

No Action: Continue to manage with the University of California, in compliance with the *East Mojave National Scenic Area Plan* guidelines.

Decision

Adopt Proposed Amendment.

Rationale

Prior to the passage of FLPMA, the Bureau of Land Management used a variety of designations to identify areas with unique or outstanding values. To eliminate the proliferation of terms, California BLM developed the ACEC "umbrella" concept, under which all special areas will be designated as ACECs. Special areas in the CDCA have been reviewed to determine their eligibility for ACEC designation. The diversity of biological resources in the Granite Mountains meet the ACEC criteria of importance and relevance, and the resources and values require special attention. The incorporation of the RNA into an ACEC will provide additional visibility to ensure its protection under the existing *East Mojave National Scenic Area Plan (1988)*.

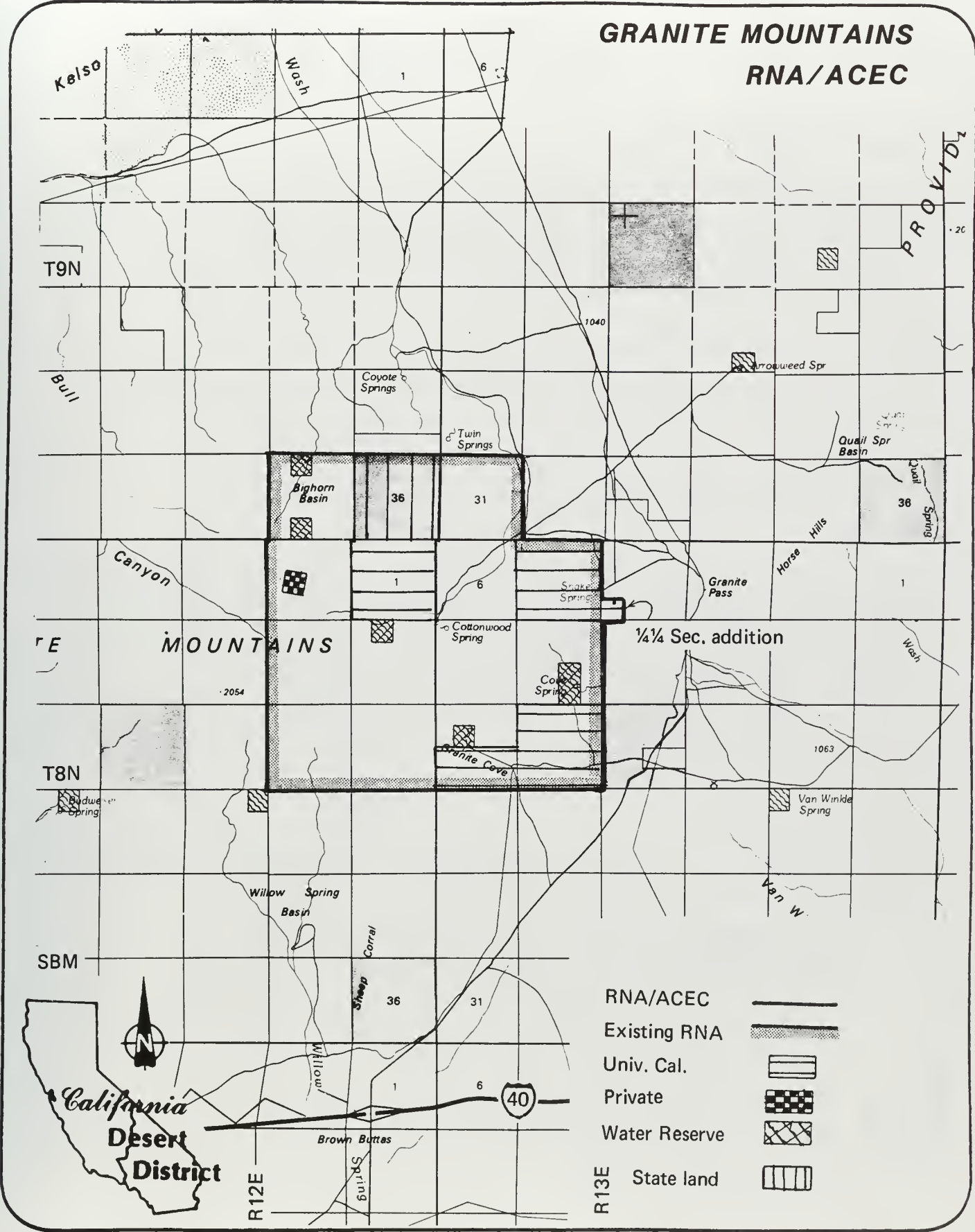
Implementation Needs

Implement management actions prescribed in the *East Mojave National Scenic Area Plan* which are applicable to the Granite Mountains, including the following:

- * Acquire one State section inside the ACEC boundary through exchange.
- * Maintain withdrawal from mineral entry for 520 acres within the ACEC.
- * Withdraw from mineral entry the remaining 6,160 acres.
- * Close several vehicle routes to protect cultural and natural resources.
- * Continue a no-shooting zone to include the entire RNA/ACEC in order to protect researchers and recreationists.
- * Maintain a Cooperative Agreement with the University of California to jointly manage the RNA/ACEC.

AMENDMENT 9

**GRANITE MOUNTAINS
RNA/ACEC**



**AMENDMENT TEN
KELSO DUNES ONA/ACEC**

Proposed Amendment

Designate 49,065 acres of the Kelso Sand Dunes as an Outstanding Natural Area (ONA)/ACEC. The ACEC boundaries would coincide with the boundaries of the Kelso Sand Dunes Wilderness Study Area (CDCA-250) which has been recommended for wilderness designation. The area would be managed to protect the unique dunes ecosystem with great species diversity found in the visually spectacular Kelso Dunes, one of the three tallest dunes systems in North America.

Other Alternatives Considered

No Action: Continue to manage under the *East Mojave National Scenic Area Management Plan*.

Decision

Adopt Proposed Amendment.

Rationale

Prior to the passage of FLPMA, the Bureau of Land Management used a variety of designations to identify areas with unique or outstanding values. To eliminate the proliferation of terms, California BLM developed the ACEC "umbrella" concept, under which all special areas will be designated as ACECs. Special areas in the CDCA have been reviewed to determine their eligibility for ACEC designation. Kelso Dunes had previously been designated in 1972 as an Outstanding Natural Area. The Kelso Dunes with their unique flora and fauna meet the ACEC criteria of importance and relevance, and the resources and values require special attention. The incorporation of the ONA into an ACEC will provide additional visibility to ensure its protection under the existing *East Mojave National Scenic Area Management Plan (1988)*.

Implementation Needs

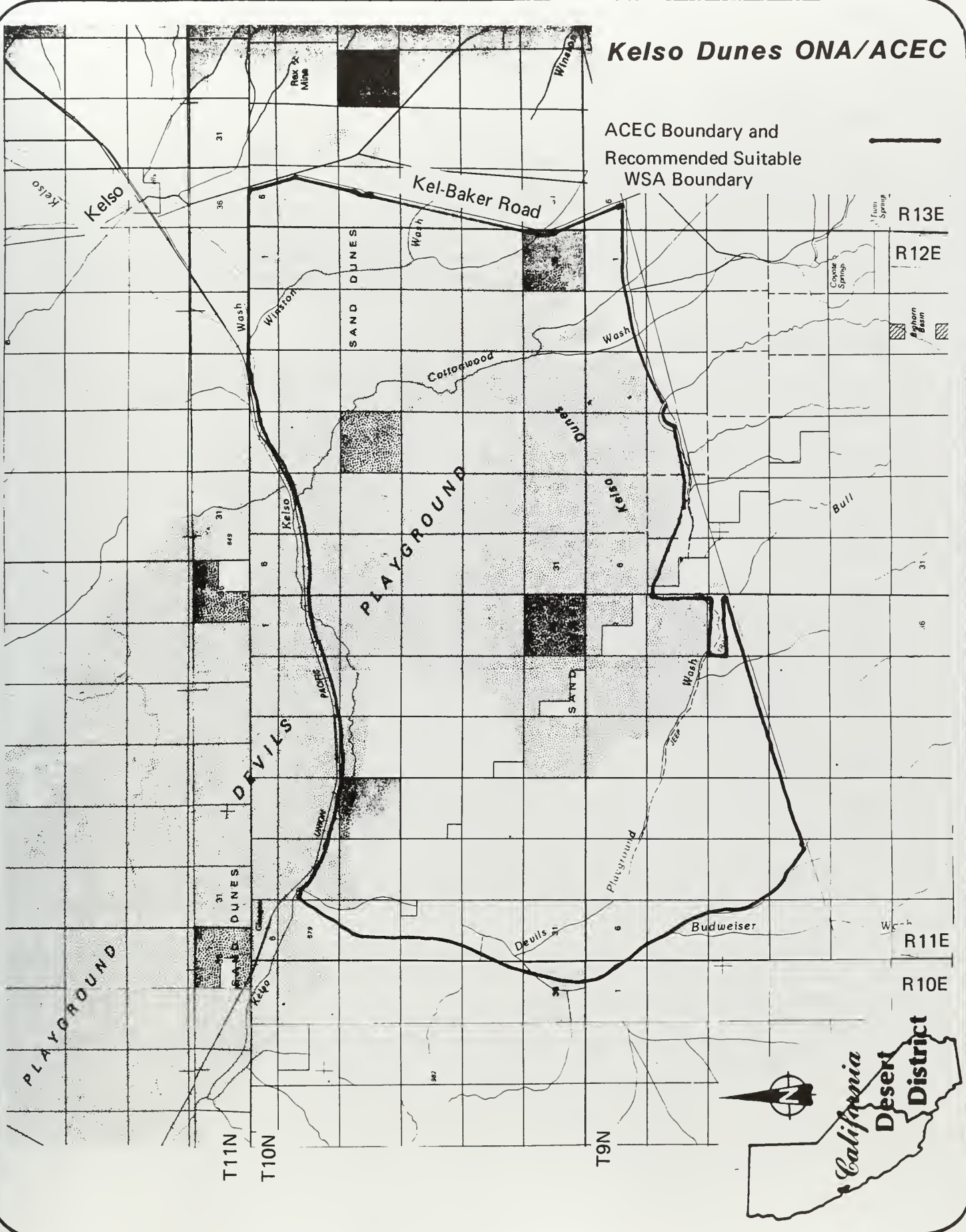
Implement management actions prescribed in the East Mojave National Scenic Area Plan which are applicable to the Kelso Dunes, including the following:

- * Maintain withdrawal from mineral entry throughout the area.
- * Maintain closure to motorized vehicle use.

AMENDMENT 10

Kelso Dunes ONA/ACEC

ACEC Boundary and
Recommended Suitable
WSA Boundary



AMENDMENT ELEVEN TURTLE MOUNTAINS NNL/ACEC

Proposed Amendment

Designate 44,160 acres in the Turtle Mountains as a National Natural Landmark (NNL)/ACEC. The ACEC would occupy the same area as the vehicle closure area established in 1976. The boundaries would encompass the central core of the Turtle Mountains, including the Mopah Springs ACEC (#75) and a large portion of the Turtle Mountain Wilderness Study Area (CDCA-307) which was recommended for wilderness designation. The area will be managed for the protection of the fragile and unique environment, including some of the most distinctive volcanic formations in the California Desert.

Other Alternatives Considered

No Action: Continue management under guidelines of BLM's Interim Management Policy for Lands Under Wilderness Review and continuation of the vehicle closure.

Decision

Adopt Proposed Amendment.

Rationale

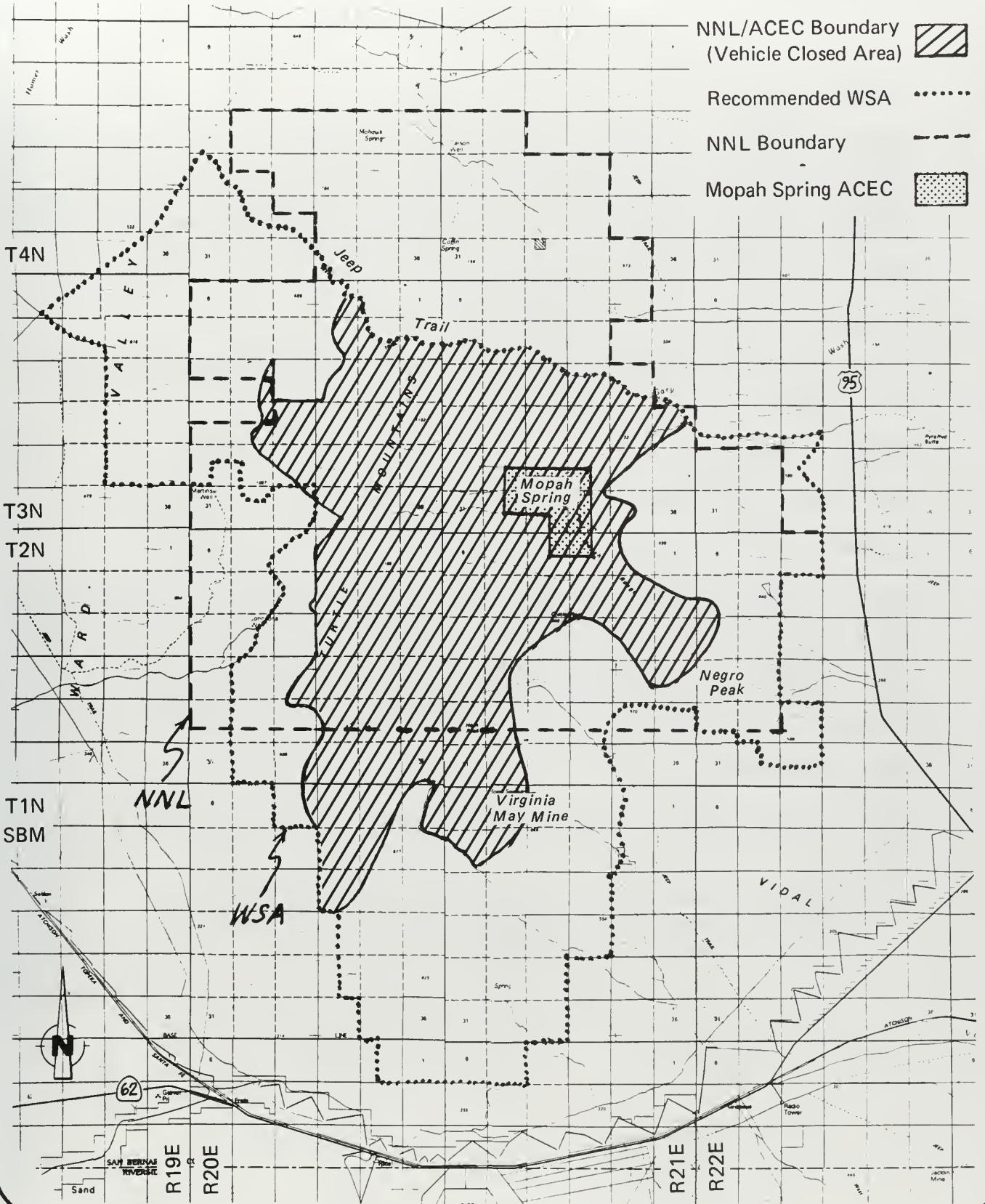
Prior to the passage of FLPMA, the Bureau of Land Management used a variety of designations to identify areas with unique or outstanding values. To eliminate the proliferation of terms, California BLM developed the ACEC "umbrella" concept, under which all special areas will be designated as ACECs. Special areas in the CDCA have been reviewed to determine their eligibility for ACEC designation. The Turtle Mountain resources meet the ACEC criteria of relevance and importance, and the resources and values require special attention.

Implementation Needs

Prepare an ACEC management plan which would incorporate management actions already established for the Mopah Springs ACEC and includes the following measures:

- * Maintain the vehicle closure by periodic ranger patrol and BLM staff observations.
- * Continue to enforce and monitor the road closure into the Mopah Springs ACEC, as directed by the ACEC Plan (1982).
- * Maintain the four-wheel drive Turtle Mountain Road which forms the northern boundary of the proposed ACEC. This route is part of the East Mojave Heritage Trail and would be maintained for this purpose.
- * Education of trail users on desert etiquette and desert tortoise protection.
- * Protect the area in accordance with the IMP until Congress decides on wilderness designation.

Turtle Mountain NNL/ACEC



**AMENDMENT TWELVE
DESERT LILY PRESERVE ACEC**

Proposed Amendment

Designate the 2,040 acre Desert Lily Preserve Natural Area an ACEC. A preserve was dedicated in 1968. The area is valued for its outstanding floral displays when winter rains are plentiful. Management of the ACEC would continue the 1972 withdrawal from all forms of appropriation including mineral entry, and maintain the 1975 fence on the east side of the preserve which borders Highway 177. Additional management actions would be prescribed as necessary to protect the unique resources at this location.

Other Alternatives Considered

No Action: Continue to management area under multiple-use class "L" and maintain existing fencing and withdrawal.

Decision

Adopt Proposed Amendment.

Rationale

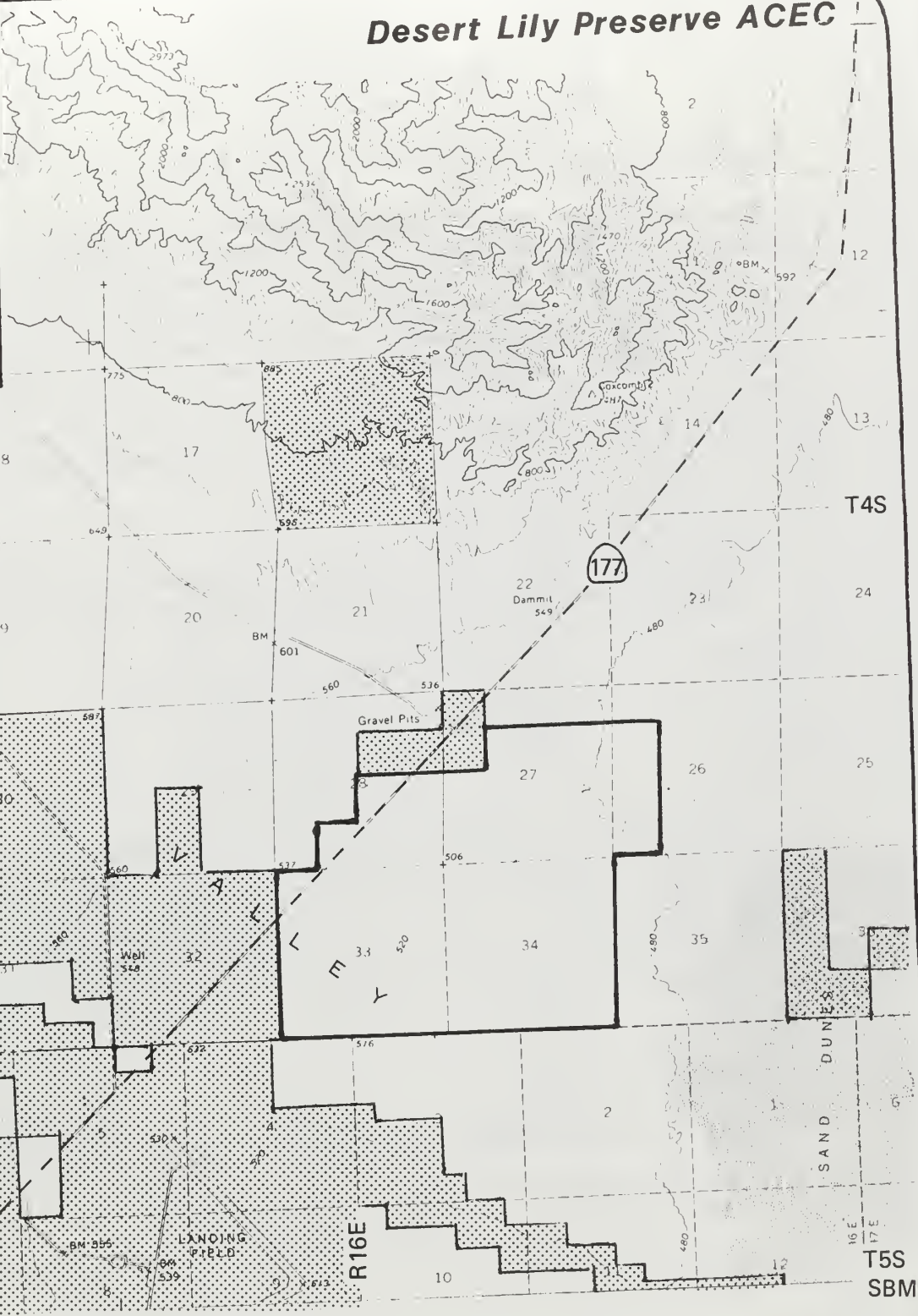
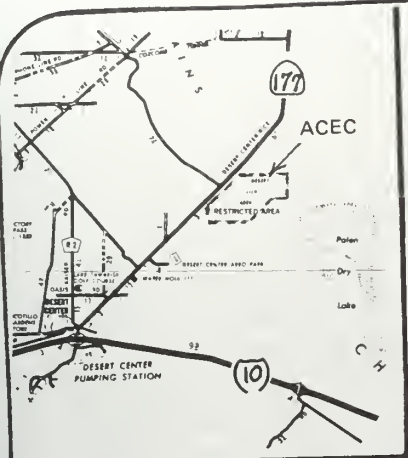
Prior to the passage of FLPMA, the Bureau of Land Management used a variety of designations to identify areas with unique or outstanding values. To eliminate the proliferation of terms, California BLM developed the ACEC "umbrella" concept, under which all special areas will be designated as ACECs. Special areas in the CDCA have been reviewed to determine their eligibility for ACEC designation. The resources found in the Desert Lily Preserve meet the ACEC criteria of relevance and importance, and the resources and values warrant special management attention.

Implementation Needs

Prepare ACEC management plan which would, at a minimum, include the following management actions:

- * Maintain withdrawal from all forms of appropriation including mineral entry.
- * Maintain the fence on the east side of the preserve bordering highway 177.
- * Monitor the status of the unique resources at this location.

Desert Lily Preserve ACEC



- ACEC Boundary
- ▨ Private Land
- Public Land

AMENDMENT THIRTEEN
NORTH ALGODONES DUNES NNL/ACEC

Proposed Amendment

Designate ACEC status for the 27,767 acre portion of the Imperial Dunes to be called the North Algodones Dunes and which has the same boundaries as the portion of Wilderness Study Area CDCA-360 that the Bureau recommends as suitable for wilderness designation. The area is bordered on the south by Highway 78, on the west by the new Coachella Canal, on the east by the Southern Pacific Railroad and the Niland Glamis Road, and on the north by Mammoth Wash. The ACEC would be termed the North Algodones Dunes to distinguish it from the larger area known as the Imperial Sand Dunes. The ACEC will be managed in accordance with the 1987 *Imperial Sand Dunes Recreation Area Management Plan (RAMP)* which prescribed special management measures for protecting the northern portion of the dune system included in this ACEC.

Other Alternatives Considered

No Action: Continue management under the *Imperial Dunes Recreation Area Management Plan (1987)* and the Interim Management Policy for Lands Under Wilderness Review.

Decision

Adopt Proposed Amendment.

Rationale

Prior to the passage of FLPMA, the Bureau of Land Management used a variety of designations to identify areas with unique or outstanding values. To eliminate the proliferation of terms, California BLM developed the ACEC "umbrella" concept, under which all special areas will be designated as ACECs. Special areas in the CDCA have been reviewed to determine their eligibility for ACEC designation. The outstanding dune system and associated resources located in the North Algodones Dunes meet the ACEC criteria of relevance and importance, and warrant special management attention.

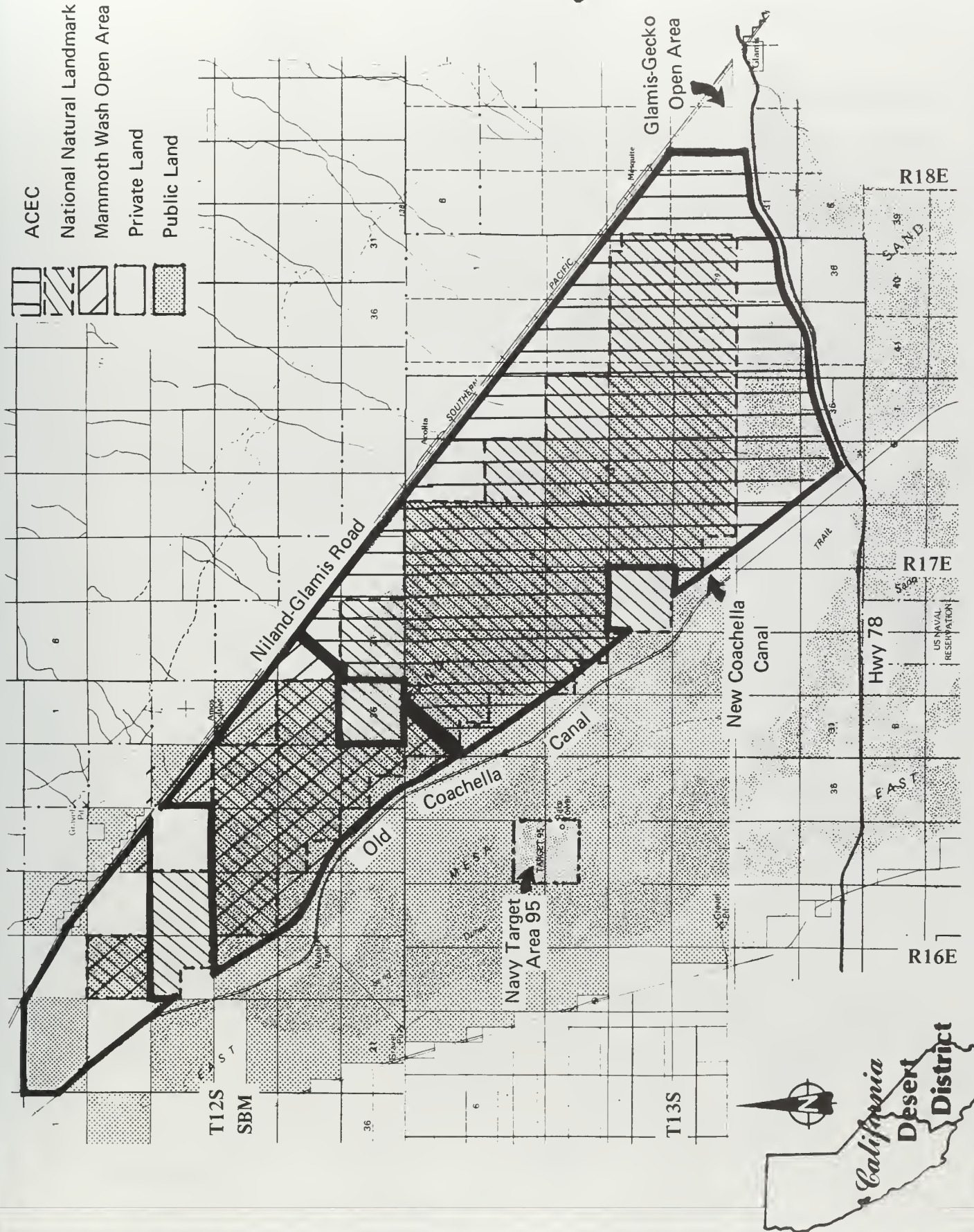
Implementation Needs

Implement the management actions prescribed in the *Imperial Sand Dunes RAMP* as follows:

- * Maintain and aggressively enforce motor vehicle closure.
- * Enhance nonmotorized recreation opportunities.
- * Protect wilderness suitability in accordance with BLM's Interim Management Policy for Lands Under Wilderness Review.
- * Monitor and protect the integrity of plant and wildlife habitat.

North Algodones Dunes NNL/ACEC

- ACEC
- National Natural Landmark
- Mammoth Wash Open Area
- Private Land
- Public Land



**AMENDMENT FOURTEEN
MULTIPLE-USE CLASS CHANGE IN PIPES CANYON**

Proposed Amendment

Change the multiple-use class of two parcels in the Pipes Canyon watershed (approximately 480 acres) from "L" to unclassified.

Other Alternatives Considered

No Action: Continue to manage the area under Multiple-Use class "L".

Decision

Adopt Proposed Amendment.

Rationale




The two parcels are isolated within an area containing only private lands or other scattered unclassified parcels. This change in classification would make these parcels available for sale or exchange and would be consistent with the long term management of this area.

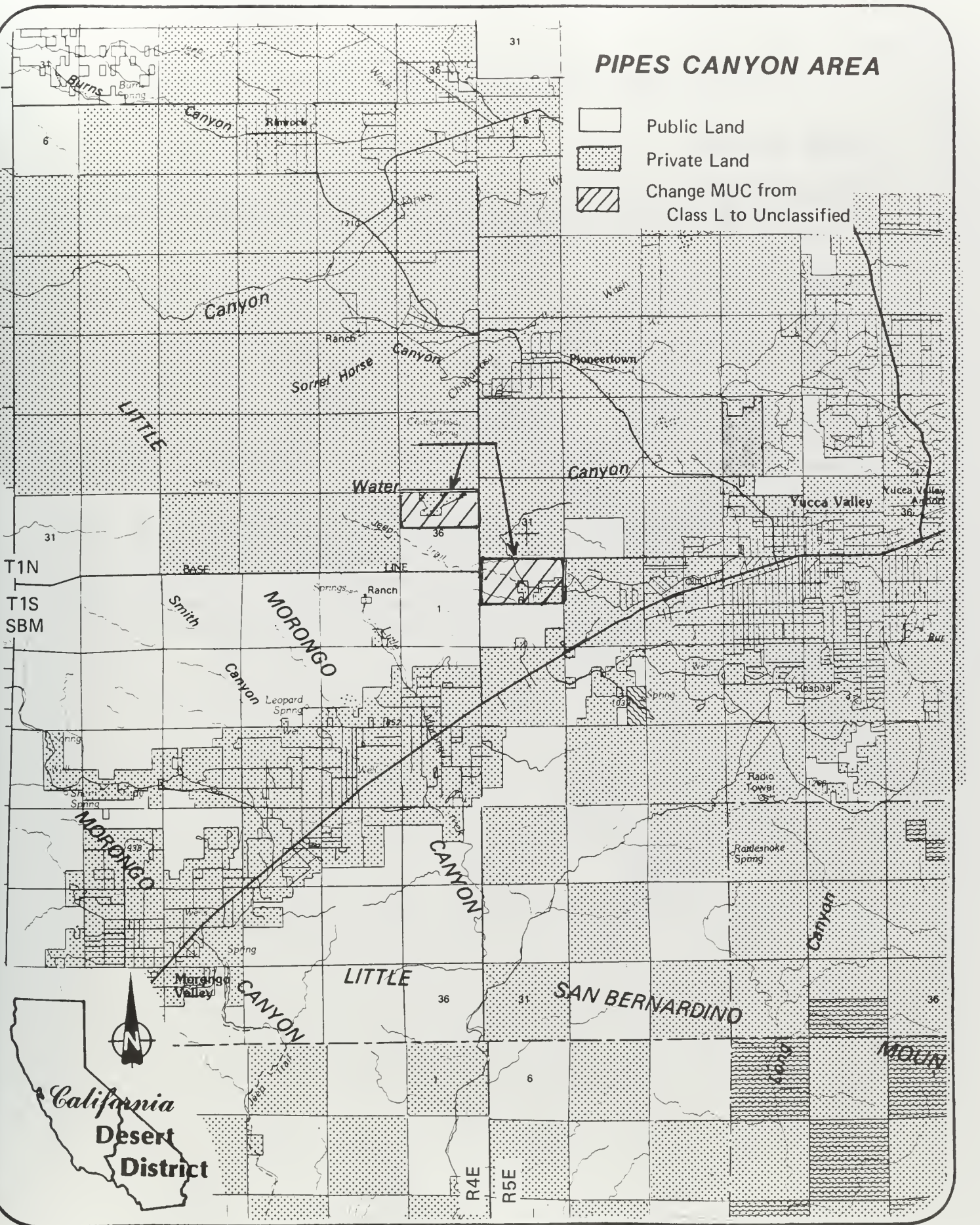
Implementation Needs

None.

AMENDMENT 14

PIPES CANYON AREA

-  Public Land
-  Private Land
-  Change MUC from Class L to Unclassified



**AMENDMENT FIFTEEN
MULTIPLE-USE CLASS CHANGE IN ARROYO SALADA OPEN AREA**

Proposed Amendment

Change the multiple-use class of approximately 8.5 sections in the Arroyo Salada Open Area from "I" to "M" for transfer to the State of California, and change two sections adjacent to the east of the open area from "I" to "M" for a total of 10.5 sections.

Other Alternatives Considered

No Action: Continue to manage the area under multiple-use class "I".

Decision

Adopt Proposed Amendment.

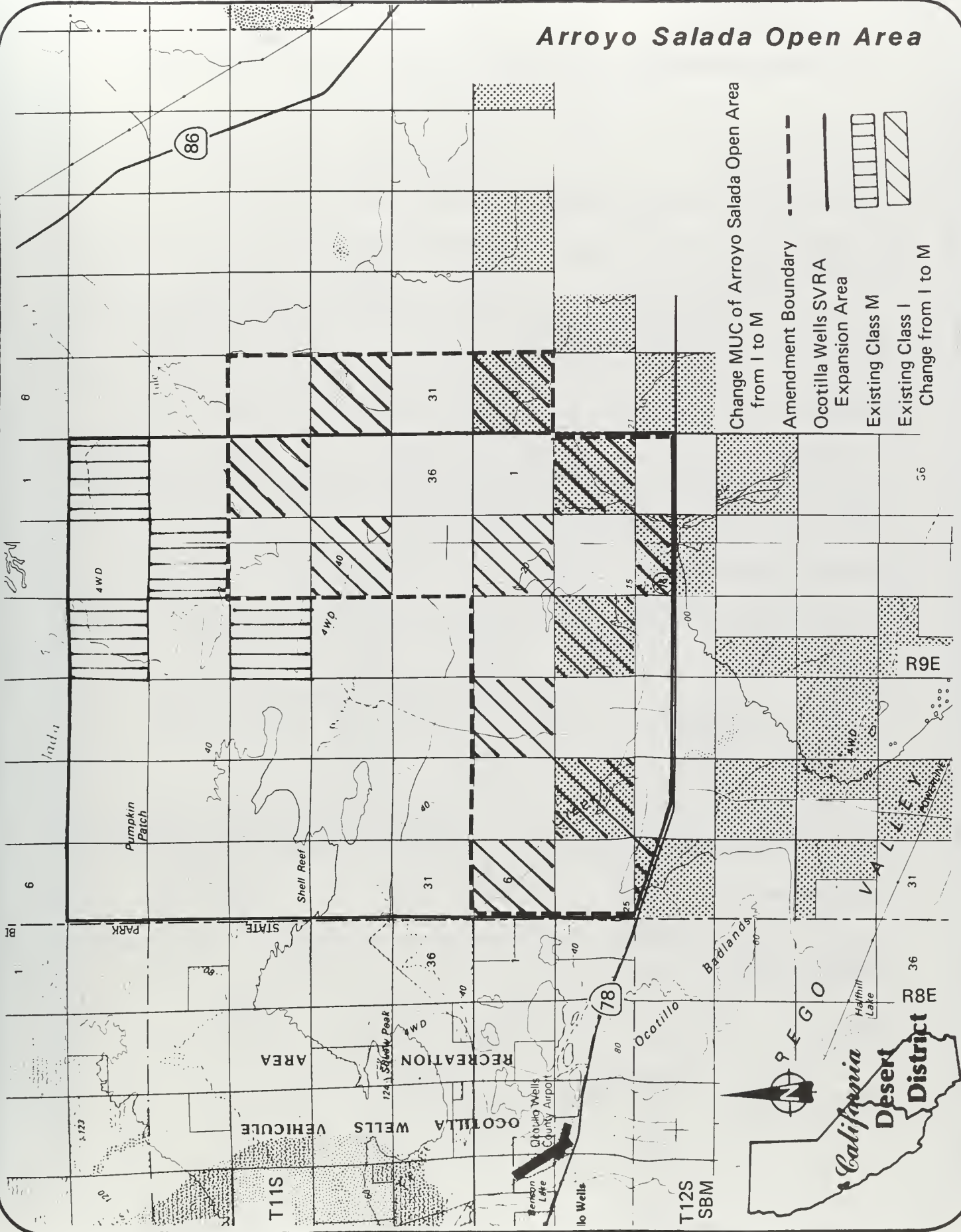
Rationale

The change in multiple-use designation from "I" to "M" will allow for the transfer of these lands to the California Department of Parks and Recreation which plans to add this area to their adjacent Ocotillo Wells State Vehicular Recreation Area. The area consists of scattered sections of private and public land. The State has acquired much of the private land and wants the authority to manage the remaining public land. Two sections just east of the State Parks acquisition area would be changed from Class "I" to Class "M" for consistency with the surrounding Class "M" lands.

Implementation Needs

None.

Arroyo Salada Open Area



**AMENDMENT SIXTEEN
MULTIPLE-USE CLASS CHANGE AND VEHICLE ACCESS DESIGNATION
IN EL MIRAGE MANAGEMENT AREA**

Proposed Amendment

Within the El Mirage Cooperative Management Area:

- (1) The multiple-use class of approximately 11,000 acres is changed from "unclassified" to Class "I" (intensive use).
- (2) Motorized vehicle access is changed from "undesignated" to "open", except for 1,280 acres on the lake bed which are already classified as "open".
- (3) As private land within the management area is acquired (approximately 12,000 acres), it will be designated as Multiple Use Class "I" and as an "open" motor vehicle access area.
- (4) Outside the management area, 5,800 acres of scattered tracts of unclassified lands are changed to Class "M" with the intent of maintaining them. The remaining 3,200 acres of scattered tracts remain unclassified and available for disposal. Motorized vehicle access of these scattered lands are changed from "undesignated" to "limited."

Other Alternatives Considered

No Action: Continue to manage the area under the existing multiple-use classes and motor vehicle designations.

Decision

Adopt Proposed Amendment.

Rationale












The Proposed Amendment implements the 1990 management plan for El Mirage and provides the basis for resolving long-time conflicts over areas of mixed public and private land ownership.

Implementation Needs

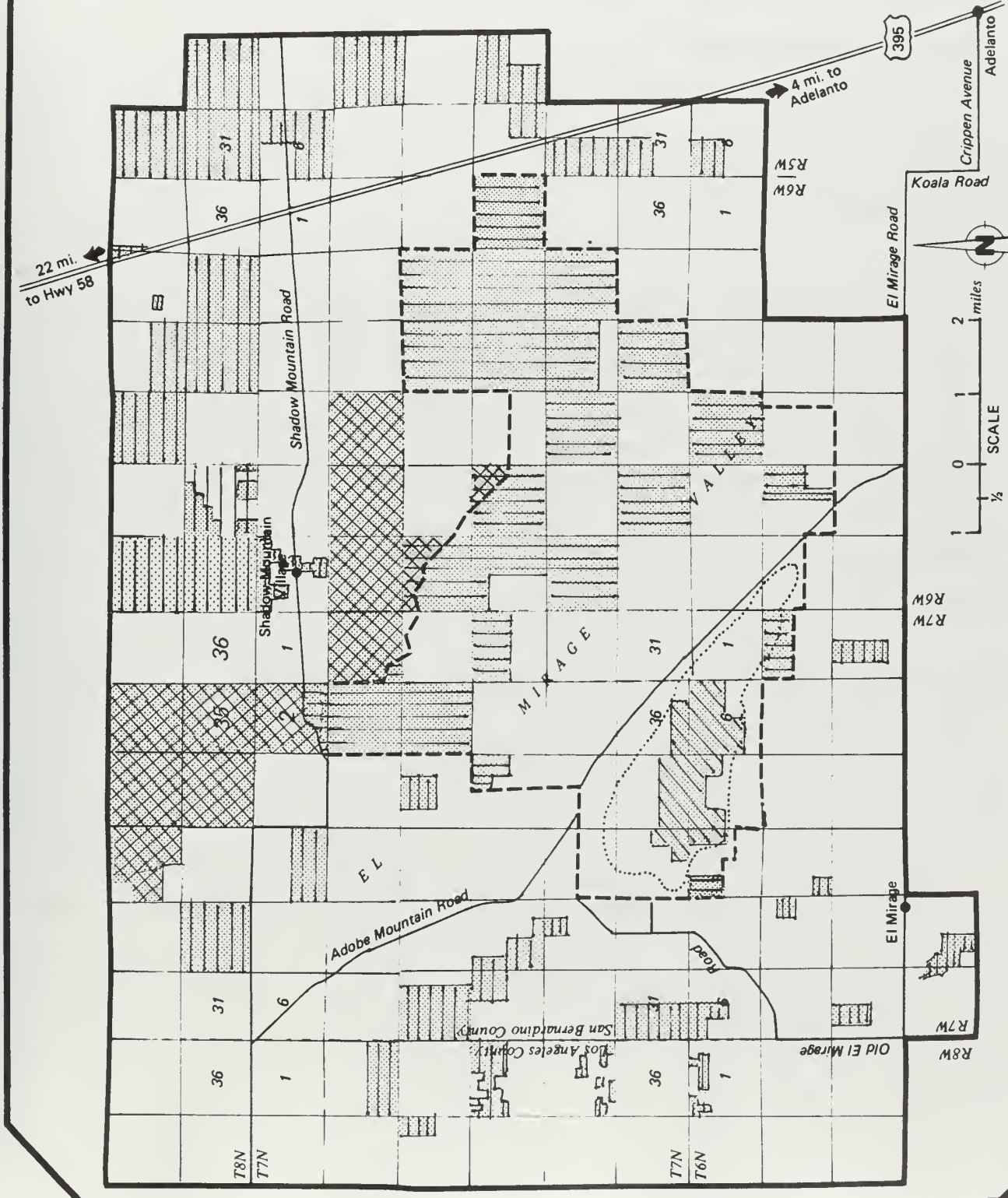
Implement actions in accordance with the 1990 *Management Plan for El Mirage Cooperative Management Area*.

AMENDMENT 16

EL MIRAGE Cooperative Management Area

-  Amendment Area
-  Management Area
-  Public Land
-  Private Land
-  MUC "I"
-  VAD "Open"
-  Change MUC from Unclassified to "I"
-  Change VAD from undesignated to "Open"
-  Change VAD from Undesignated to limited
-  Change MUC from Unclassified to "M"
-  Change VAD from Undesignated to Limited

MUC = Multiple Use Class
VAD = Vehicle Access Designation



**AMENDMENT SEVENTEEN
PALEN EPIHEMERAL GRAZING ALLOTMENT**

Proposed Amendment

Delete the 50,500-acre Palen Grazing Allotment from the Livestock Grazing Element of the *California Desert Conservation Area Plan*.

Other Alternatives Considered

No Action. The area would continue as an grazing allotment.

Decision

Adopt Proposed Amendment.

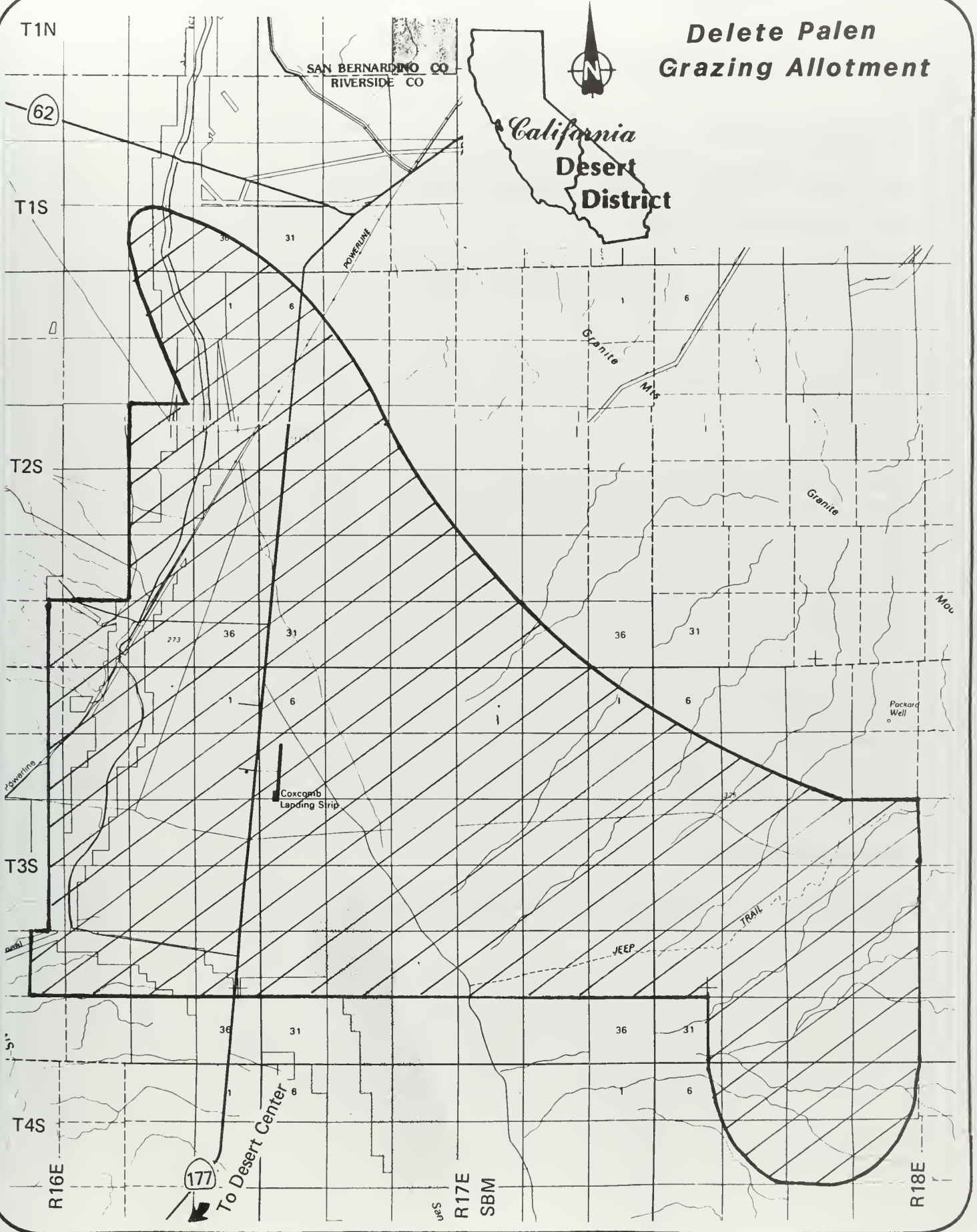
Rationale

The California Department of Fish and Game has expressed their intention of augmenting the bighorn sheep population in the Granite and Palen Mountain ranges adjacent to the Palen Grazing Allotment. Bighorn sheep likely would move through the allotment as they pass between the Coxcomb Mountains and the Palen and Granite Mountains. Recent studies have indicated that bighorn are highly susceptible to pathogenic organisms carried by domestic sheep. The deletion of this allotment would ensure that such a risk would be avoided. The allotment has not had authorized grazing use since completion of the CDCA Plan in 1980, and no interest has been demonstrated in the allotment.

Implementation Needs

None.

Delete Palen
Grazing Allotment



**AMENDMENT EIGHTEEN
RICE VALLEY EPHEMERAL GRAZING ALLOTMENT**

Proposed Amendment

No Action: Continue the Rice Valley Ephemeral Grazing Allotment.

Other Alternatives Considered

Delete the 37,800-acre Rice Valley Ephemeral Grazing Allotment from the Livestock Grazing Element of the *California Desert Conservation Area Plan*.

Decision

Adopt the Proposed Amendment.

Rationale

This amendment proposal was introduced at the request of the California Department of Fish and Game which was considering the possibility of introducing bighorn sheep into the Big Maria and Little Maria Mountains in the vicinity of the Rice Valley Ephemeral Grazing Allotment. If introduced into these mountain ranges, bighorn sheep would likely move through the allotment as they pass between the Big and Little Marias and would be exposed to pathogenic organisms carried by domestic sheep. However, based in part on habitat factors, the Big Maria Mountains appear to be a deficiency zone (i.e., a portion of fragmented habitat which lacks crucial biological factors causing the area to be inadequate) for the bighorn sheep (Weaver, R.A. and Mensch, J.L., 1971, "Bighorn Sheep in Northwestern Riverside County", California Department of Fish and Game, *Wildlife Management Administration Report No. 70-1*). Further, the factor of domestic sheep being grazed on private land nine miles from the Big Maria Mountains would remain a concern even if Rice Valley Ephemeral Grazing Allotment were to be closed (Technical Staff Desert Bighorn Council, 1990, "Guidelines for management of domestic sheep in the vicinity of desert bighorn habitat", *Desert Bighorn Council Trans., Vol. 34*). For these reasons, the introduction of bighorn seems problematic in the near future and the need to delete the grazing allotment unnecessary at this time.

Implementation Needs

Reconsider the issue during environmental assessment process, if a renewal application for the lease, which expires in 1994, is filed.

**AMENDMENT NINETEEN
DELINEATION OF DESERT TORTOISE MANAGEMENT CATEGORIES**

Proposed Amendment

Delineate tortoise habitat on public land in the CDCA in three management categories as follows:

Category I - 2,227,000 acres	Goal: Maintain stable, viable populations and increase populations where possible.
Category II - 461,000 acres	Goal: Maintain stable, viable populations.
Category III - 1,529,000 acres	Goal: Limit declines to the extent possible using mitigation measures.

The "crucial habitat" as shown on Map 4 of the CDCA Plan is superseded by this amendment.

Other Alternatives Considered

No Action: Continue utilization of the single category of crucial habitat as defined in the *California Desert Conservation Area Plan*.

Decision

Adopt Proposed Amendment.

Rationale

The BLM was directed to categorize tortoise habitat in three categories in the *Desert Tortoise Habitat Management on the Public Land: A Rangeland Plan (1988)*. Goals and criteria were established for each management category and applied, utilizing the best available data, to the California Desert Conservation Area Plan. The proposed amendment establishes the categories and their boundaries but does not impose management constraints for the different categories. Categories are assigned to public land only and not to intermingled private land or State land. The delineation of habitat in the categories is to provide emphasis and visibility and to assist in the analysis and review of proposed actions in desert tortoise habitat.






Implementation Needs

Any activity on public land that requires an authorization will require consultation with the United States Fish and Wildlife Service.

DESERT TORTOISE HABITAT CATEGORIES

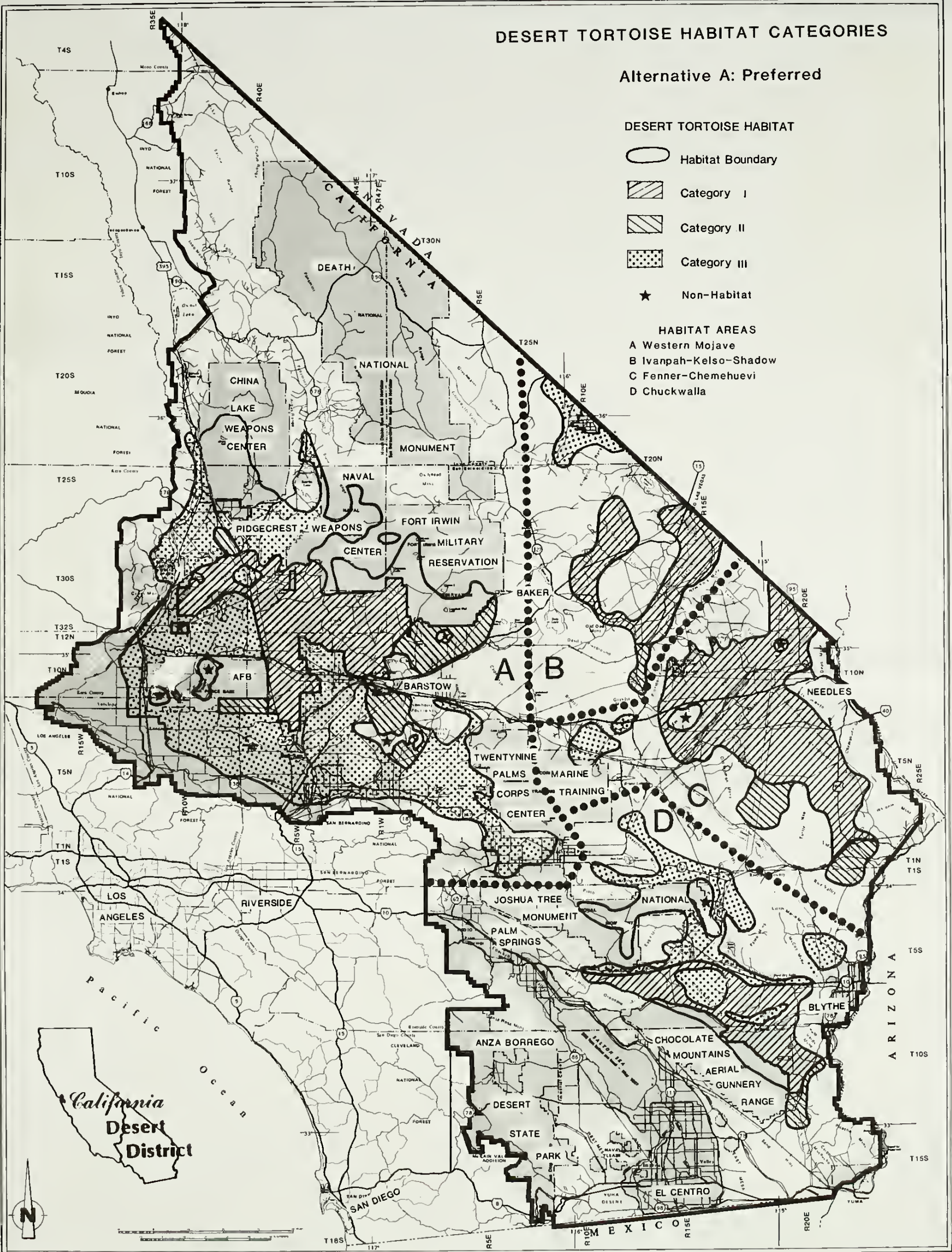
Alternative A: Preferred

DESERT TORTOISE HABITAT

-  Habitat Boundary
-  Category I
-  Category II
-  Category III
-  Non-Habitat

HABITAT AREAS

- A Western Mojave
- B Ivanpah-Kelso-Shadow
- C Fenner-Chemehuevi
- D Chuckwalla



Comments & Responses

WRITTEN COMMENTS AND RESPONSES

During the 60 day public review period, October 18 to December 16, 1991, a total of 16 letters addressing the proposed amendments were received by the BLM. All letters were reviewed. Those letters that had substantive comments and had a direct bearing on a proposed amendment were given a response. Table 1 lists each comment letter by author and in approximate order of receipt. Each letter has been designated a reference number. Within a letter substantive comments are noted using the reference number, and the response is keyed to the 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 1
Written Comments

Letter Number	Source of Letter
1	Roy M. Evans, City of Victorville
2	Elden Hughes, Sierra Club SCNRCC
3	Tom Dodson, Desert Tortoise Preserve Committee
4	Harvey J. Sawyer, District 8, Department of Transportation
5	George E. Moncsko, Desert Tortoise Preserve Committee
6	Tom Levy, Coachella Valley Water District
7	John R. Swanson
8	Carol Whiteside, The Resources Agency of California
9	Mary Griggs, State Lands Commission
10	Steven Ault, California Integrated Waste Management Board
11	June Latting, Ph.D.
12	Dr. John T. Rotenberry, UCR Natural Reserve System; Dr. Phillippe S. Cohen, Granite Mountains Reserve; Dr. F. Allan Muth, Boyd Deep Canyon Desert Research Center
13	Patrice Davison, Association of 4WD Clubs, Inc.
14	Ron Schiller, High Desert Multiple-Use Coalition
15	Kathleen M. Kunysz, The Metropolitan Water District
16	Thomas M. Cragg, Department of Army, Fort Irwin



October 28, 1991

Bureau of Land Management
California Desert District
Attn: Plan-Amendments
6221 Box Springs Blvd.
Riverside, CA 92507-0714

RE: 1989/1990 CALIFORNIA DESERT CONSERVATION AREA PLAN AMENDMENTS (1600/
CA-060.2)

Dear Mr. Gerald E. Hillier:

Thank you for the opportunity to review the proposed Conservation Plan Amendments. Amendment 19, Desert Tortoise Management, is of particular interest to Victorville. There are two points which we feel should be considered during the adoption process.

First, George Air Force Base is currently slated for closure. If the Desert Tortoise Management categories are to be applied to private lands as well as BLM properties, consideration should be given to including the George AFB site. This property will be transferred to private ownership in 1992-94. Rather than re-amend your plan and maps, it may be appropriate to include the base in a designated category at this time.

Second, the Victor Valley is at the edge of the Desert Tortoise range. Since 1988 the City of Victorville has required biological studies on all undeveloped properties prior to issuing permits. Out of over 265 studies which have been conducted, tortoises have been found on only two parcels, both in the northern 1/2 of the city. On one parcel only one tortoise and four summer burrows were discovered on 900 acres. The other parcel involved 160 acres with 2 tortoises and 38 summer burrows. It is apparent, based upon this experience that Victorville does not meet even the Category III guidelines. Consideration should be given to refining the map and specifically deleting these areas which are not in the normal habitat of the Desert Tortoise.

Below are four specific comments relative to the text itself:

Executive Summary

- | | |
|-------------------------------------|---|
| S-3 | The number of ACEC net changes should be 10 not 9 as shown. |
| S-4
Amendment 1
Alternative E | <p><u>Wildlife/Vegetation</u>
The actual impact would be continued deterioration due to trespass and off-road vehicle activities.</p> <p><u>Geology-Energy-Minerals</u>
The actual impact would be the continued depletion of mineral resources due to recreational collecting and off-road vehicle activities.</p> |

1-1

The amendment does not designate private lands or lands under other State or Federal jurisdictions, therefore, the categories were not applied to George Air Force Base.

1-2

The intent is to categorize potential or historic habitat on BLM administered lands. Further, refinement may occur through the West Mojave Management Desert Tortoise Cooperative Management Plan.

1-3

We have not found any deterioration in wildlife or vegetation resources in the Manix area from these activities. It is the paleontological resources and not the minerals that are impacted by recreational collecting and other activities. A no-effect determination is appropriate in this context.

1-3

We have not found any deterioration in wildlife or vegetation resources in the Manix area from these activities. It is the paleontological resources and not the minerals that are impacted by recreational collecting and other activities. A no-effect determination is appropriate in this context.

S-5 Amendment 2 Alternative B	Wildlife/Vegetation See the note about S-4. Minerals See the note above S-4.	1-4	1-4	We concur that there is an error and the "Wildlife/Vegetation" in the Executive Summary should have had a negative impact for Alternative B. The no effect for minerals is appropriate.
S-11 Alternative A	The Executive Summary should mention the potential disposal of 3,200 acres stated on page 4-15.	1-5	1-5	This 3,200 acres was not listed in Table S-2 because, as stated on page 4-15, it is available for disposal under both the no action and preferred alternative.

Very truly yours,

JOHN R. HNATEK
DIRECTOR OF PLANNING AND DEVELOPMENT



Roy M. Evans
Associate Planner

RME:gd

TOM DODSON & ASSOCIATES

444 N ARROWHEAD AVE., SUITE 203
SAN BERNARDINO CA 92401
(714) 884-9700

November 25, 1991

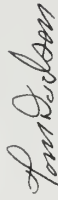
Bureau of Land Management
California Desert District
6221 Box Springs Boulevard
Riverside, CA 92507-0714

Subject: 1989/90 Desert Plan Amendment No. 19

Dear Sirs:

As Vice President of the Desert Tortoise Preserve Committee, I am taking this opportunity to express my support for Alternative A of Amendment No. 19. This appears to be the most consistent with the Rangewide Plan and the development of habitat management plans for the protection and recovery of the desert tortoise.

Sincerely,



Tom Dodson
Vice President
Desert Tortoise Preserve Committee

DEPARTMENT OF TRANSPORTATION

DISTRICT 8, P O BOX 231
SAN BERNARDINO, CALIFORNIA 92402
TDD (714) 383-4609



December 10, 1991

08-SBd-Var

Mr. Gerald E. Hillier, District Manager
California Desert District
Bureau of Land Management
6221 Box Springs Boulevard
Riverside, CA 92507

Dear Mr. Hillier:

Environmental Assessment CA-060-EA-1-14
for the Proposed 1989/1990 Amendments to
the California Desert Conservation Area Plan

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

5

Several areas proposed for "Special Area Designation"
(proposals 1, 3, 5, 6, 9, 12, 14) are traversed by state routes.
These roads will need to be improved in the future. This will
require additional right of way for road construction. Please
ensure that this plan and its implementing regulations do not
prevent these future improvements. If they do, a significant
statewide traffic impact will result and should be addressed in
the environmental document for this plan.

4-1

None of these ACEC designations prohibit future highway improvements.
Amendments to existing highway rights-of-way would be subject to compliance with
the National Environmental Policy Act (NEPA) and must comply with the applicable
ACEC Management Plan.

We look forward to working with you in order to ensure the
coordination in meeting both of our goals. If you have any
questions, please contact Tom Meyers at (714) 383-6908 or FAX
(714) 383-5936.

Sincerely,

HARVEY J. SAWYER, Chief
Transportation Planning
San Bernardino County
Coordination Branch

Desert Tortoise Preserve Committee, Inc.
P.O. Box 2910
San Bernardino, CA 92406
10 December 1991


Bureau of Land Management
California Desert District
6221 Box Springs Blvd.
Riverside, CA 92507-0714

Subj: 1989/90 Desert Plan Amendment Number 19

Dear Sir:

The Desert Tortoise Preserve Committee is pleased to have the opportunity to comment on the proposed amendments. Specifically, the Committee supports amendment 19, alternative A. Establishing three categories on the ground consistent with the Rangewide Plan will allow the best opportunity to develop habitat management plans to recover the tortoise populations and maintain viable large wild populations.

Sincerely,


George E. Moncsko
Vice President, Desert Tortoise
Preserve Committee



ESTABLISHED IN 1918 AS A PUBLIC AGENCY

COACHELLA VALLEY WATER DISTRICT

POST OFFICE BOX 10568 • COACHELLA, CALIFORNIA 92238 • TELEPHONE (619) 398-2651

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BERNARDINE SUTTON SECRETARY
OWEN McCOOK ASSISTANT GENERAL MANAGER
REDWINE AND SHERRILL ATTORNEYS

December 13, 1991

File: 0065.14

Bureau of Land Management
California Desert District
6221 Box Springs Boulevard
Riverside, California 92507

Gentlemen:

Subject: Proposed 1989/1990 California Desert
Conservation Area Plan Amendments
and Environmental Assessments

This letter is in response to Environmental Assessment No. CA-060-EA-1-14,
Proposed 1989/1990 Amendments to the California Desert Conservation Area Plan.
The district appreciates the opportunity to comment on this document.

Two amendments within this document describe lands which are within operational
areas of the district and can impact the district's authority and timeliness for
normal operations and emergency repairs. These are Amendment No. 3, Coachella
Valley Fringe-Toed Lizard Preserve and Amendment No. 13, Algodones (Imperial)
Dunes. The district shall address its concerns in further detail in
Attachment A, enclosed.

If you have any questions or require additional information please call
Joseph Cook, planning engineer, extension 292.

Yours very truly,

for Tom Levy
General Manager-Chief Engineer

JEC:dr/el2

Enclosure/1/as

TRUE CONSERVATION
USE WATER WISELY

ATTACHMENT A

File: 0065.14

1. Page 2-3, Amendment No. 3, Coachella Valley Fringe-Toed Lizard Preserve, RNA and ACEC.

A. Alternative A is stated as the preferred alternative for the Coachella Valley Fringe-Toed Lizard Preserve. This plan would combine the Edom Hill-Willow Hole Preserve, the Coachella Valley Preserve and the Whitewater Floodplain (Indian Avenue) Preserve to form the Coachella Valley Fringe-Toed Lizard Preserve and designate these areas as critical habitat. The Whitewater Floodplain (Indian Avenue) Preserve is currently protected as a preserve and also is a portion of the Whitewater Stormwater Channel which protects the desert cities from stormwater damage. It is the concern of the district that any change from the current land use status shall interfere with possible future maintenance and improvement of the stormwater channel.

B. The district requests that Alternative B, (No Action), be selected as the preferred plan. This plan would not add the Whitewater Floodplain reserve to the existing areas of critical environmental concern.

C. The district reserves the right to require separate Environmental Impact Reports for actions taken to enforce Amendment No. 3 which inhibit the maintenance of the stormwater channel. Such actions imply the use of acceptable risk factors for human life and require a detailed hydrologic analysis of the channel by the Bureau of Land Management.

2. Page 2-9, Amendment No. 13, Designate a Portion of the Imperial Dunes,>NNL and>NNL/ACEC.

A. This amendment, (Alternative A), designates 27,767 acres of the Imperial Dunes area to be added to "Areas of Critical Environmental Concern." The description of this portion of land identifies the west boundary of this land as the new Coachella Canal. This designation of "Areas of Critical Environmental Concern" will prohibit emergency repairs and regular maintenance along the east bank of the Coachella Canal. The district, therefore, requests a 1,320-foot (1/4 mile) buffer zone be dedicated as an easement along the east bank of the canal for conditional use by the district.

6-1

Designating the area as an ACEC would not affect the Coachella Valley Fringe-toed Lizard critical habitat which was delineated when the species was listed in 1980. Critical habitat is an official designation which only the U.S. Fish and Wildlife Service can bestow.

6-1

6-2

In 1984, as compensation for the construction of settling ponds on BLM lands to the west, the CVWD signed a resolution stating that the subject land would be made available for management of the Coachella Valley Fringe-toed Lizard (CVFTL). The resolution makes allowances for the maintenance and construction of flood control facilities within the area now known as the Indian Avenue preserve. The resolution also acknowledged that any actions taken by the CVWD affecting the CVFTL within the Indian Avenue preserve would require formal Section 7 consultation with the U.S. Fish and Wildlife Service. ACEC designation would not preclude the maintenance, improvement, and the construction of flood control facilities or any other action necessary for public protection. Environmental review and the appropriate consultation process would occur with or without an ACEC designation.

6-3

Designation of this portion of the Imperial Sand Dunes as an ACEC will not prohibit emergency repairs and regular maintenance along the east bank of the Coachella Canal. The Bureau of Reclamation withdrawal along the Coachella Canal would continue to provide for operation and maintenance of facilities. This is already addressed in the ACEC Management Plan.

6-3

The Resources Agency



of California

Pete Wilson
Governor

Douglas P. Wheeler
Secretary

California Conservation Corps • Department of Biology & Watersheds • Department of Conservation
Department of Fish & Game • Department of Lands & Forestry • Department of Parks & Recreation • Department of Water Resources

December 13, 1991

U. S. Bureau of Land Management
California Desert District
ATTN: Plan Amendments
6221 Box Springs Boulevard
Riverside, CA 92507-0714

Dear Mr. Hillier:

The State has reviewed the Proposed 1989/1990 California Desert Conservation Area Plan Amendments and Environmental Assessment, California Desert District, in various Southern California Counties, submitted through the Office of Planning and Research.

We coordinated review of this document with the Santa Ana Regional Water Quality Control Board, Integrated Waste Management Board, Native American Heritage and State Lands Commissions, and the Departments of Conservation, Fish and Game, and Transportation.

The Integrated Waste Management Board, and State Lands Commission have submitted the attached comments for your consideration.

The Department of Transportation responded directly in correspondence dated December 10, 1991.

Thank you for providing an opportunity to review this document.

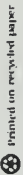
Sincerely,

for Carol Whiteside
Assistant Secretary,
Intergovernmental Relations

Attachments

cc: (See attached list.)
The Resources Building Sacramento, CA 95814 (916) 653-5656 FAX (916) 653-4102

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



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STATE LANDS COMMISSION

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THOMAS W. HAYES, Director of Finance

EXECUTIVE OFFICE
1807 - 13th Street
Sacramento, CA 95814
CHARLES WARREN
Executive Officer

December 13, 1991

Ms. Carol Whiteside
State Projects Coordinator
The Resources Agency
1416 Ninth Street
Room #449
Sacramento, CA 95814

Ms. Molly Brady
U. S. Bureau of Land Management
6221 Box Springs Road
Riverside, CA 91764

Dear Mesdames:

Staff of the State Lands Commission (SLC) has received the Proposed 1989/1990 California Desert Conservation Area Plan Amendments and Environmental Assessment (SCH 91114006).

Shortly after becoming a State, California was also granted Sections 16 and 36, or lands in lieu thereof, out of each township then held by the federal government. The lands, classified as "School Lands," were given to the State to help support public education. While many of the School Lands were sold off over the years, the State retains an interest in approximately 1.3 million acres of mostly desert and forest lands. State legislation has mandated that revenues from these school lands accrue to the State Teachers Retirement System. The SLC has jurisdiction and authority over School Lands and lieu lands.

The proposed California Desert Plan area includes the following State-owned School Lands and/or Lieu Lands:

Amendment 2:

Section 36, T31S, R44E, MDM; Section 36, T32S, R44E, MDM; Section 16, T32S, R45E, MDM.

Amendment 7:

Section 16, T32S, R45E, MDM.

9.1

9.1 This amendment only categorizes BLM administered lands not state lands.

Ms. Carol Whiteside
Ms. Molly Brady
December 13, 1991
Page Two

Amendment 8:

Section 16, T13N, R11E, SBM; Section 16, T13N, R12E, SBM.

Amendment 9:

Section 36, T9N, R12E, SBM.

Amendment 10:

Section 36, T10N, R10E, SBM; Section 36, T10N, R11E, SBM.

Amendment 11:

Section 36, T3N, R20E, SBM; Section 16, T3N, R21E, SBM.

Amendment 16:

S1/2 of SW1/4 Section 28, T8N, R7W, SBM.

Amendment 17:

Section 16, T3S, R18E, SBM.

Amendment 18:

Section 36, T2S, R20E, SBM.

Amendment 19:

This amendment, dealing with Desert Tortoise Habitat Management within Inyo, Imperial, Riverside, San Bernardino and San Diego Counties, will also include numerous State-owned School and Lieu lands.

Ms. Carol Whiteside
Ms. Molly Brady
December 13, 1991
Page Three

Thank you for the opportunity to comment. If you have any questions, please contact Don Reese at (916) 322-7808.

Sincerely,



MARY BRIGGS, Manager
Environmental Planning
and Management

cc: Don Reese

Environmental Protection Agency


State of California

Memorandum

To : Carol Whiteside
Assistant Secretary for Resources-
Environmental Review
The Resources Agency

Date: 12 December 1991

U.S. Bureau of Land Management
California Desert District
ATTN: Plan Amendments
6221 Box Springs Road
Riverside, CA 92507-0714

From : 
Steven Ault, Senior WMS
Waste Generation Analysis and Environmental Review Branch
Planning and Assistance Division
CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD

Subject: SCH# 91114006, Proposed 1989/90 California Desert Conservation Area Plan
Amendments and Environmental Assessment, September 1991

Board staff have reviewed the subject document, and have found no readily identifiable solid waste generation/disposal impacts which might stem from the 17 proposed amendments. However, we wish to take this opportunity to advise you of proposals for 3 regional landfills which might be constructed. Each are in various stages of the planning process. Their establishment may or may not, and directly or indirectly, impact the California Desert Conservation Area Plan, through the potential for increased vehicular (truck, train) traffic and litter associated with these proposed projects.

Riverside County:

a. The proposed Eagle Mountain Mine Regional Landfill, contact David Mares, Riverside County Planning Department

San Bernardino County:

a. The proposed Rail Cycle Regional Landfill Project, Santa Fe Railroad Waste Management Inc.; contact Mike Williams, senior planner, phone (714) 387-4155

b. The proposed Vulcan Mine Regional Landfill, Davenport, contact Paul Glass or Nancy Sansonetti, senior planner, phone (619) 243-8245.

Board staff have commented on the DEIR/DEIS for the Eagle Mountain Project, but have not yet commented on the following three projects.

Thank you for the opportunity to review this document. If you have any questions regarding these comments you may contact Claire Miller of my staff, at (916) 255-2333.

cc: Claire Miller, CIWMB
Martha Vasquez, CIWMB

JUNE LATTING, PH.D.
 320 MARAVILLA DRIVE
 RIVERSIDE, CA 92507
 (714) 686-9156

15 December 1991

BLM, California Desert District
 6221 Box Springs Boulevard
 Riverside, CA 92507-0714

Re: Proposed 1989/1990 California Desert Conservation
 Area Plan Amendments and Environmental Assessment.

Dear Sirs:

I have reviewed the above-mentioned amendments and environmental assessment and would like to submit the following comments.

I commend the Bureau on a well presented and organized document and I agree with BLM Preferred alternatives on all amendments except as set forth below:

Amendment 1 - Manix-New ACEC: According to the map, paleontological/cultural resources are widely distributed in this area and extend beyond the boundaries of the proposed ACEC. They should be given the highest priority in management as well as adequate land for their protection. I recommend Alternative A which covers the largest land area. Shouldn't the extension also be included in the ACEC?

Amendment 4 - BLM recommends deletion of Halloran Wash ACEC - this area and the desert tortoise should be protected as fully as possible until the Habitat Management Plan for the Ivampah-Shadow-Kelso area is completed. I recommend Alternative B which allows retention of the ACEC designation.

Amendment 15 - Arroyo Salada: BLM recommends changing MUC of 10.5 Sections in the Open Area from "1" to "M" on the assumption that this land will be transferred to the State Parks Department for addition to the Ocotillo Wells State Vehicle Recreation Area. I approve of the change to Moderate Use category, but before any consideration of transfer of this area to the State SVRA, there should certainly be a reevaluation of the current status as an open area due to the several sensitive species of plants and wildlife in the area. BLM should complete a thorough and detailed study of the vegetation and wildlife, particularly the sensitive species of plants such as Pierson's milkweitch (*Asragalus magdalenae* var. *piersonii*), Borrego milkweitch (*A. lentiginosus* var. *borreganus*), flat-seeded spurge (*Chamaesyce platysperma*) and Orcutt's woody aster (*Xylophiza occuttii*). (The latter is a Federal Candidate 2 plant and has been observed in the area (A. Sanders, personal communication). Additionally, both the flat-tailed horned lizard, a Federal Candidate 1 species, and the Colorado Desert fringe-toed lizard, a Federal Candidate 2 species, should be afforded adequate protection in the interim. More appropriately, BLM should reduce the use of offroad vehicles in this area, confine them to designated roads and trails, and give adequate protection to these plants and animals which will surely be wiped out if there is increased use in the area. Incidental to this, in an analysis dated November 1, 1991, of the 1992/93 proposed budget of the Off-Highway Motor Vehicle Division of State Parks which was distributed at the Commission's November 14, 1991, meeting in

11-1 The preferred alternative contains the majority of the known paleontological resources located on public lands. The additional resources located on private land would be difficult to manage.

11-2 See response to 2-1.

11-3 Before transferring the land to the State of California, an environmental assessment will be prepared in which all resources will be considered. Further, regulations for the Recreation and Public Purpose Act require public notice of the proposed transfer and notification of the environmental assessment's availability. The multiple use class change only makes the land available for consideration for transfer.

San Bernardino, it was stated that the proposed Ocotillo Wells acquisition (\$9,475,000.00 "to purchase 20,040 acres of private and state lands property and request BLM to transfer 13,560 acres they own in the area for a total increase of 33,600 acres to the unit") has been moved to 1993/94.

Amendment 16 - BLM recommends changing Multiple-Use Class and Vehicle Access in El Mirage Cooperative Management Area. As stated, the impact on wildlife, including the desert tortoise and Mohave ground squirrel, would be increased. It seems premature to adopt the amendment at this time as management of the desert tortoise, and presumably the Mohave ground squirrel, would be included in the West Mojave Habitat Management Plan now in preparation. It therefore seems appropriate and prudent that this proposal should be developed concurrently with the West Mojave Habitat Management Plan after more is known about these sensitive species.

Amendment 18 - BLM recommends "No Action" on the proposal to delete Pice Valley Ephemeral Grazing Allotment. I recommend acceptance of this proposed amendment because even if we have adequate rainfall this season, the drought has lasted so long that vegetation is quite stressed. And if there is little or no rain, the impact could be severe.

Thank you for the opportunity to comment on the proposed amendments.

Sincerely yours,

June Laiting
June Laiting

11-4

11-4 The management plan, completed in 1990, for the El Mirage Cooperative Management Area, culminated almost 10 years of public effort. The extensive planning effort for El Mirage addressed the impact to sensitive wildlife species and their habitat; and a formal consultation with the U.S. Fish and Wildlife Service regarding the desert tortoise resulted in a non-jeopardy decision. The Western Mojave Coordinated Management Plan will provide a regional plan for dealing with both short and long term impacts to sensitive species and their habitats. Many of the actions, not contingent on the plan amendment, are in the process of being implemented.

11-5

11-5 See response to 12-6.

UNIVERSITY OF CALIFORNIA, RIVERSIDE

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SANTO BARBARA • SANTA CRUZ

DEPARTMENT OF BIOLOGY
RIVERSIDE CALIFORNIA 92521
VOICE: (714) 577-2063
FAX: (714) 567-1286

Bureau of Land Management
California Desert District
ATTN: Plan Amendments
6221 Box Springs Blvd.
Riverside, California 92507-0714

16 December 1991

RE: Proposed 1989/1990 California Desert Conservation Area Plan
Amendments and Environmental Assessment

We have reviewed the proposed amendments to the CDCA plan and, in general, we support the Bureau's efforts to update their management activities in this ecologically sensitive and important area of California. For example, the adoption of Amendment 3, consolidation of three separate reserves into a single Coachella Valley Fringed-toed Lizard RNA/ACEC will, we think, greatly facilitate management and enhance funding priorities for the preserve. ACEC status for the Coachella Valley Preserve is also compatible with recent California Department of Fish and Game designation of the it as an Ecological Reserve. However, several of the proposed amendments have environmental implications that merit further discussion before the BLM's preferred alternatives are adopted.

Amendment 5: The proposal to reduce the Amboy Crater NNL from 5,760 acres to 640 acres seems a poor one, especially given current development and recreational pressures on this area. The prospect of a large landfill site (Rail Cycle) in conjunction with the growing traffic along old Route 66 due to growth along the Colorado River adds urgency to the need to protect important and unique lands along this corridor. Hence, reducing the NNL seems both untimely and inappropriate. While ACEC designation is merited, it should include the entire Amboy Crater and lava flow area.

Amendment 6: We foresee no problems with RNA/ACEC designation for the lands adjacent to our Sacramento Mountains Reserve. We presume that BLM will keep us informed about efforts to include the additional 80 acres in a joint management agreement.

Amendment 7: We support the addition of ACEC status to the Cima Dome lands insofar as it increases the protection of this outstanding natural area. There needs to be a survey to determine if there continue to be any Gilded Northern Flickers in the area.

Amendment 9: Based on our past experiences, we strongly urge that the proposed boundaries for the ACEC included the entire current No-shooting Safety Zone rather than just the present boundaries of the

12-1

12-1

During a 1987 field review of Amboy Crater with the National Park Service (NPS), the NPS initially proposed the acreage reduction of the NNL to incorporate only the cinder cone itself and not the surrounding lava flow. The Bureau adopted this recommendation as part of a project plan completed for the area in 1987. Our intent is to provide consistency, where possible, between NPS designation and BLM's ACEC designation. The criteria are sufficiently similar to warrant similar boundaries. Management actions included in this plan such as facility development, vehicle access and mineral withdrawal have already been approved after a public review process.

12-2

12-2

The ACEC designation adjacent to the U.C. Sacramento Mountains Reserve provides for cooperative management and research opportunities, and the BLM anticipates developing a Memorandum of Understanding with the University of California to address such interests.

12-3

12-3

The "Wildlife" section on page 3-10 of the Environmental Assessment references a Habitat Management Plan for this area which would include the Gilded Northern Flicker and which is scheduled to be completed in 1996.

12-4

12-4

The no-shooting safety zone is a management action implemented as part of the *East Mojave National Scenic Area Plan* (EMNSA). The ACEC designation is based on the area meeting the criteria of relevance and importance. The existing RNA is a

12-4 physical unit set aside for the primary purpose of research and higher education, and
cont. the dual designation of RNA/ACEC recognizes the significance of this purpose and
brings the area under the ACEC umbrella. The area outside the RNA is being
adequately protected by actions prescribed in the EMNSA plan.

RNA. In addition to providing greater management continuity (as well
as continued safety to users), it would include the Granite Pass
area, which is rich in archaeological resources and an area that
attracts high recreational use.

12-5 Amendment 10: We find the description of grazing on the Kelso Dunes
as "moderate" (p. 3-14) to be inaccurate. We strongly support ACEC
designation if this increases the likelihood that BLM will closely
monitor the impact of grazing in this area and take measures to
reduce it as appropriate. These dunes, as the BLM as pointed out,
contain a varied biota with many endemic species. Strong steps are
needed to guarantee that this unique habitat is not further degraded
by continued grazing.

Amendment 17: We strongly support the BLM's preferred alternative;
elimination of this grazing allotment will have only beneficial
effects on vegetation and wildlife. This amendment will encourage
CDFG to proceed with the reintroduction of bighorn to the Palen
Mountains. Additionally, this amendment would continue present
management activities, as the allotment has not been used since 1980.

12-6 Amendment 18: We vigorously support the amendment to delete the Rice
Valley grazing allotment. The justification for the BLM-preferred
"no action" alternative is not persuasive. Quite apart from bighorn
sheep, drought conditions have had a severe impact on all plant and
animal populations throughout the desert. It may take decades for
some populations to recover to pre-drought levels. It would not
benefit other wildlife to permit grazing during the first good years
of primary production after twenty bad years. The argument that
sheep graze private land to the south of the allotment is not
compelling either (this argument could be used for virtually any
allotment in the Mojave Desert). Elimination of the Rice Valley
allotment would provide about 36,000 disease-free acres for bighorn
migration. Elimination of the allotment would not have a detrimental
effect on the lessee; since the allotment has not been authorized for
grazing since the 1970's (p. 4-19), the lessee has neither derived a
benefit from the allotment nor become dependent on the forage.

12-7 Amendment 19: Although the three proposed categories appear
superficially convenient, we are not convinced that they are
sufficient to handle the range of circumstances and quality of desert
tortoise habitat. This classification should either be expanded, or
there must be an explicit effort to subdivide each of these major
categories. Any classification scheme should be based on
scientifically sound ecological and biological studies, and it is not
clear that this one is (especially given the dearth of information
about what constitutes healthy tortoise habitat and a viable
population). Developing such a categorization requires a major
research and planning effort unto itself, and not simply a
presentation as one of nineteen amendments to an existing plan.

12-5 The BLM recognizes the need to monitor grazing impacts on the dunes. Vegetation
study plots currently exist and funding has been sought for further research efforts.
To date, these proposals have not been funded, but the BLM continues to explore
possibilities of accomplishing this monitoring goal.

12-6 As an ephemeral grazing unit, the recent drought has precluded the Bureau of Land
Management from activating the lease. Grazing will only be authorized if the Rice
Valley Allotment receives enough precipitation to produce ephemeral vegetation
growth sufficient to meet the requirements established in the CDCA Plan.
Although the presence of domestic sheep is considered a critical issue to the health
of bighorn sheep, domestic sheep do not appear to be the primary constraint to the
successful long term occupation of the Big Maria Mountains at this time. R.A.
Weaver and J.L. Mensch found the Big Maria Mountains to be a deficiency zone
(i.e., a portion of fragmented habitat which lacks crucial biological factors causing the
area to be inadequate) for bighorn sheep ("Bighorn Sheep in Northwestern Riverside
County", Big Game Investigation Project, California Department Fish and Game,
Wildlife Management Administration Rep. No. 71-1, 1971). This determination was
based on more than the presence or absence of domestic sheep. It was based on
other habitat factors as well as the lack of bighorn sheep occupation under normal
conditions since at least 1946. The issue of domestic sheep being grazed on private
lands 9 miles from the Big Maria Mountains would also continue to be a concern
(Technical Staff Desert Bighorn Council, 1990, "Guidelines for management of
domestic sheep in the vicinity of desert bighorn habitat", *Desert Bighorn Council
Trans., Vol. 34*) even if the Rice Valley Allotment itself is closed to domestic sheep
grazing. A more appropriate time to address the issue of domestic sheep grazing in
the Rice Valley Allotment will be during the environmental assessment process, if
there is an application for renewal of the lease when it expires in 1994. At that time,
additional data should be available to better determine the overall consequences of
domestic sheep grazing in the Rice Valley Allotment.

12-7 The categorization is directed by the *Desert Tortoise Habitat Management on Public
Land: Rangewide Plan (1988)*; the number of categories and the criteria are

One final concern we have is our absence from the BLM's mailing list. This is especially disconcerting since not only are we obviously concerned about BLM's activities throughout the Mojave and Colorado deserts (as evidenced by our comments above), but also two of the proposed amendments (6 and 9) have a direct effect on lands we manage.

To reiterate, overall we generally support the BLM's proposed amendments. Insofar as the extension of ACEC status will serve to protect the natural values of public lands, we vigorously applaud the Bureau's efforts on this behalf. Thank you for allowing us the opportunity to make comments on your plan.

Sincerely,



Dr. John T. Rotenberry
Director, UCR Natural Reserve System



Dr. Philippe S. Cohen
Director, Granite Mountains Reserve

Al Muth / sra

Dr. F. Allan Muth
Director, Boyd Deep Canyon Desert Research Center

cc: Dr. Deborah Elliot-Fisk, Director, UC Natural Reserve System
Mr. Jeff Kennedy, Senior Planner, UC Natural Reserve System

12-7 cont. prescribed there. The proposed classification is based on the best information available and the judgement of BLM, CDFG and the USFWS biologists. As additional information is obtained and as tortoise populations change, the categorization in Amendment 19 is subject to change by Plan Amendment. In particular, the habitat management plans, being prepared for each of the four desert tortoise management areas in California Desert, will reevaluate and modify as needed the category assignments. The BLM has been using a similar category map for two years, and the number of categories is sufficient to develop overall management guidelines. Within this framework, additional project mitigation measures are developed in environmental documentation to any proposed action to address the specifics of the site and project.

12-8 We have placed you on our mailing list.

12-8



PATRICE DAVISON
FIELD REPRESENTATIVE
6192 Magnolia Avenue, Suite D
Riverside, CA 92506
(714) 369-8960
FAX (714) 684-2043

December 16, 1991

Bureau of Land Management
California Desert District
ATTN: Plan Amendments
6221 Box Springs Blvd.
Riverside, Ca. 92507-0714

To Whom It May Concern:

Please accept these comments on behalf of the California Association of Four Wheel Drive Clubs, Inc. The Association is a statewide organization representing the interests of motorized recreationists. Members of the Association seek long distance, scenic touring opportunities in a primitive setting.

Association concern in regards the proposed plan amendments deals primarily with the loss or restriction of motorized opportunities where adequate justification is lacking or defective. In addition, presentation of material is not accurate with regards changes to Vehicle Access acreage (Table S-1). These proposals constitute significant Federal actions that require a full and adequate review of the management situation, both from a human perspective as well as the natural environment.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Patrice Davison
Field Representative

cc: Mike Ahrens
Merv Hemp
Harry Baker
Ron Pite
Dick MacPherson
Mary Grimsley
Paul Winters
OHVLC

12/13/91
 CALIFORNIA ASSOCIATION OF FOUR WHEEL DRIVE CLUBS, INC.
 COMMENTS ON 1989/90 PROPOSED DESERT PLAN AMENDMENTS

Amendment 1 - MANIX

Summary of Alternatives (S-4) states that vehicle access would not be affected in any of the five alternatives. However, ACEC designation of other areas (i.e. Afcon Canyon) has led to the restriction of existing and future motorized use. ACEC designation is not simply another way to provide special attention to an area, it usually conveys with it a whole host of restrictive actions. Page 4-1 clearly indicates that "No new recreational access roads would be authorized or allowed." Primary concern centers around continued use of the Mojave Road; secondary concern is for the other routes that may exist or would be necessary in the future.

Affected Environment section (page 3-3) should provide total mileage found within the different areas under consideration.

Justification has not been provided why ACEC designation is the best or only means with which to protect this area. Page 2-1 notes that ACEC designation "would attempt to prevent recreational fossil collection." What is the level of collection currently? Is that an increase from previous years? What other management methods have actually been tried to prevent such activity? What other management controls have been proposed and evaluated to prevent such activity?

The concern here is that potential inappropriate activity is being countered with restrictive management designations, even though the problem may be one of enforcement, not unsuitable land status. Would not more law enforcement presence, or education, do more in a real sense than a line on a map and the acronym ACEC? Is the BLM suggesting that ACEC designation effects a change in behavior patterns, i.e. the lawless element disappears???

Document discussion (4-2) opposing the "spot zone" concept (changing Manix area acreage MUC from M to L in lieu of ACEC) is illogical and irrelevant. It is obvious that lands under ACEC designation surrounded by lands under a different form of management also fit under the "spot zone" concept, yet the BLM routinely operates this way. Taking such a point further, one could argue that any different designation is "not practical." Does that rationalize the entire desert as one huge wilderness? The very essence of good planning and zoning is being able to apply some flexibility to the picture and making the management scenario suit the resource. The "tailoring" of management direction to the situation should be the goal and not viewed as a detriment.

Blanket prohibition against the authorization of new routes is premature, arbitrary and capricious when mandated without specific environmental analysis. Where is the document providing site specific rationale for such a decision? Does that not effect a closed area under EO 11989? Should not Table S-1 be revised to show an addition in Closed Acreage (under Vehicle Access section)? Full disclosure to the public has not been made as required by NEPA.

- | | |
|------|---|
| 13-1 | New routes for recreational use would require a plan amendment. Authorized and designated routes would continue. See also the Response to 13-4. |
| 13-2 | No routes are being closed as a result of this action; therefore, we did not analyze in detail the impacts of the proposed action and alternatives on miles of routes available. |
| 13-3 | ACEC designation is based on whether the area meets the criteria of "importance" and "relevance" as described on page 1-4 of the Environmental Assessment, and warrants special management attention. |
| 13-4 | ACEC designation serves to highlight that an area contains resource values meeting ACEC criteria. It is the primary method used by the BLM for ensuring special management attention for such identified values. As such it is BLM's most effective tool for giving priority to the protection of those resources. Class "L" designation which provides protection does not carry with it the intended priority associated with the ACEC status; therefore, it is less effective in ensuring protection of those resources. |
| 13-5 | The BLM is required to specify special management measures necessary to protect areas warranting ACEC designation. The environmental analysis is presented in the Environmental Assessment. This area is located in a "limited" Motor Vehicle Access area. |

In that ACEC designation and the relative impact on mining appears to be a substantial part of the discussion in favor of the designation (Section 4), perhaps management action should focus on that issue without the additional layer of red tape common to ACEC status.

Based on plan information and rationale, the Association cannot support the application of ACEC status to this area as the best or only means of management action.

Amendment 2 - BLACK MOUNTAIN

For many of the same reasons as previously mentioned for Amendment One, the Association rejects the proposed expansion of the Black Mountain ACEC where that designation effects an elimination or restriction on motorized use (see Page 2-2) without benefit of site specific environmental analysis and review.

Why must the proposal for ACEC designation also contain suggested route closures? Doesn't this constrain the Activity Plan that would be developed subsequent to designation (i.e. the Activity Plan will have to conform to the Plan Amendment description of action? And if it doesn't, then why suggest route closure at all?)

The mere presence of sensitive artifacts does not mandate route closure. Where verifiable degradation of the resource has occurred due to motorized use, effective management action is needed. This action may take the form of a variety of measures. As described on page 3-4, however, the problem appears to be one of unauthorized, illegitimate activity. Once again, the law abiding citizen is made to suffer as a result of the illegal actions of others.

Contrary to the assertion made on page 4-4 that "Lack of ACEC management... would result in continued vandalism..." it seems much more accurate to state that lack of enforcement will result in continued vandalism. Document information is not sufficient to justify the proposed closure of routes as part of the ACEC expansion. Document information may be sufficient to warrant a review of the existing management where there is a "continued difficulty of controlling vehicle use" in regards illegal activity, but that does not necessarily mean ACEC designation is the right or only answer.

It is interesting to note that the discussion on alternatives, page 2-2, leads the reviewer to believe that the management actions under the preferred alternative could not, or would not be proposed if the area did not receive ACEC status. That is simply not the case and alternative discussion should be revised to clearly state that strong management action as listed under the preferred (or even other actions not mentioned) could also be pursued under the No Action alternative.

13-6

13-6 For ACECs the BLM is required "to provide for designation and protection of ACECs through the land use planning process" (Sect. 202(c)(3) of Federal Land Policy and Management Act of 1976). Special management activities necessary to protect the resource are, therefore, appropriate in land use plans. The subsequent activity planning is, thus, constrained by the management guidelines set forth in the land use plan. In this case route closures have already been recommended in the approved *Management Plan for Black Mountain Cultural Area (1988)*.

13-7

13-7 ACEC designation serves to highlight that an area contains resource values meeting ACEC criteria, and it is the primary method used by the BLM for ensuring special management attention for such identified values. As such it is a more effective tool for giving priority to the protection of those resources. While management action can be imposed without designation, ACEC status ensures priority consideration.

Full disclosure has not occurred. Section 4 comment on consequences neglects to state the losses to the public and displacement of use as a result of area/route closure. More information should be supplied when a significant change in management action is being proposed, i.e. What is the amount of visitor use days occurring in the area? How has that increased from the past 25 years? What is the level of law enforcement in the area? How many citations have been written for these illegal activities? From an overall perspective of the area, what is the relative impact of the illegal activity (very great, moderate, minor)? What is the cumulative impact on the human environment of the proposed route closures? What other means were examined to reduce the illegal use? Doesn't ACEC status mean more additional closed acreage under table S-1?

In addition, this Association must register strong protest with the narrative on page 3-4 referencing a Desert Tortoise Category, when those designations are not final and may not be final for many months or even years. Any reference to the "category" should be stricken from the document under this proposal.

Amendment 3 - CVFTL

The Association has no comment on the proposed action

Amendment 4 - HALLORAN WASH

The Association concurs with the preferred alternative to delete this ACEC. It is again appropriate to mention strong opposition to the use of tortoise categories (page 3-7) when such specific delineations have not been verified or approved on a desert-wide, local basis.

Amendment 5 - AMBOY CRATER

Page 3-8 notes that no vehicle use will be allowed inside the proposed 640 acre ACEC. This should be shown as Closed under EO 11989, with Table S-1 revised under the Vehicle Access section.

Amendment 6 - BIGELOW CHOLLA

The Association has grave concerns with statements made such as that found on page 4-6 wherein ACEC status is hailed as a mechanism to respond to conflicts or impacts. It would seem to be much more beneficial if planning documents could give some credibility to the plain idea that strong and effective management is possible without layer after layer of bureaucratic acronyms and concepts. The BLM has more than adequate regulations on the books to insure protective management. What the BLM lacks is the ability to allocate sufficient resources (i.e. money for plans, rangers, research, etc.) to that management. If ACEC designation is one of the main ways the Bureau uses to secure the needed funding, then the rationale for ACEC designation should simply state that as the reason why (although the validity of using ACEC status for funding is questionable also).

13-8

There is not a significant change, because the public is not being excluded from the area. The management actions as approved in the *Management Plan for Black Mountain Cultural Area* (1988) are intended to protect the resources and improve the recreational experience in the area. The open roads identified in the management plan allow for sufficient access to and through the area.

13-9

The phrase "Desert Tortoise category" should be prefaced in the EA by the term "interim". The categorization is directed by the *Desert Tortoise Habitat Management on Public Land: Rangewide Plan (1988)*; the number of categories and the criteria are prescribed there. The proposed classification is based on the best information available and the judgement of BLM, CDFG and the USFWS biologists.

13-9

13-10

See response to 13-2

13-11

See response to 13-7

Amendment 7 - CIMA DOME

Loss of motorized recreation opportunity is a key concern. Adequate justification has not been provided to support the preferred alternative. Section 4 discussion (page 4-8) on environmental consequences neglects to consider that any possible positive recreational/interpretive impact (which is itself doubtful) would be offset by a negative recreational impact (loss of public access due to route closures). A management objective to provide interpretive materials for public appreciation and education is possible without ACEC status.

Again, insufficient justification and lack of full disclosure characterizes this amendment.

Not only is an inappropriate reference made to tortoise categories on page 3-10, but that reference is one from an indirect sense ("The proposed ACEC is surrounded on the north, west, and south..."). Is that an attempt to create buffers around the category areas? The category concept is extremely controversial and does not deserve mention here, nor should insult be added to injury with mention of the surrounding area. It is not relevant at this time.

Amendment 8 - CINDER CONES

Same discussion as for Amendment 7. Rationale explaining why ACEC status is the best or only way to provide effective management has not been provided. The direct and indirect impacts caused by the proposed loss of motorized opportunity are not thoroughly explained. It is obvious to the Association that needed management actions are still attainable even without ACEC status, so the question becomes why does this amendment exist? Reference to tortoise categories should be deleted.

Amendment 9 - GRANITE MOUNTAINS

Concern is relative to route closures, where justification is absent. Tortoise information on page 3-12 is more suitable with regards presentation (doesn't use the category reference). Please see previous Association comment where necessity for ACEC status is disputed.

Amendment 10 - KELSO DUNES

Delete reference to DT Category I (page 3-13).

Amendments 11, 12, 13 (TURTLE MTNS, DESERT LILY, IMPERIAL DUNES)

No comment on the proposals

13-12

See response to 13-7. The route closures and other management actions noted in this amendment are already prescribed in the *East Mojave National Scenic Area (EMNSA) Management Plan*, which was prepared with public involvement and in compliance with NEPA requirements, for Cima Dome. No additional route closures are recommended as part of this proposal.

13-13

The phrase "management Category I should be prefaced by the word "interim". The BLM has been using a similar category map for two year. No buffer is intended; the reference is only a description of surrounding environment.

13-14

See response to 13-7 and 13-9. The route closures and other management actions specified by this amendment are already prescribed in the EMNSA plan which was prepared with public involvement and in compliance with NEPA requirements. No additional route closures are recommended as part of this proposal.

13-15

See response to 13-7. The route closures, no-shooting safety zone and other management actions specified by this amendment are those already prescribed in the EMNSA plan for the Granite Mountains. No additional route closures are recommended as part of this proposal.

13-16

The phrase "Management Category I" should be prefaced by the word "Interim". BLM has been using a similar category map for two years.

Amendment 14 - PIPES CANYON

No comment on the proposal

Amendment 15 - ARROYO SALADA

Comment on Environmental Consequences page 4-14 should be modified to include direction that in the event DPR plans for Ocotillo Wells acquisition/expansion do not materialize, the next cycle of Plan Amendments will pursue the change back to MUC I.

13-17

13-17 If circumstances change with respect to future use for Ocotillo Wells, we would determine at that time the need to remand our decision

Amendment 16 - EL MIRAGE

The Association has been a participant in the El Mirage planning process and supports resolution of the conflicts. It is suggested that the Amendment document clarify in no uncertain terms in section 2 (page 2-11) and section 4 (Environmental Consequences) that approval of this Amendment is a formality only, to facilitate incorporation of the already approved El Mirage Plan into the Desert Plan. This information is found on page 3-21. Presentation in section 4 leads one to believe that the entire Management Plan is up for discussion again, when in actuality, it should not be.

13-18

13-18 The plan amendment is to implement the management actions recommended in the El Mirage plan. During the scoping period (1988-89) for the development of the *Management Plan for the El Mirage Cooperative Management Area (1990)*, it was decided not to amend the CDCA Plan as part of the El Mirage Plan. Instead, the necessary amendments to the CDCA Plan would occur as part of the regular, yearly CDCA Plan amendment process. It was anticipated that the decision record for the CDCA Plan amendment process would occur before, or at least concurrent with the approval of the El Mirage Plan (1990). This did not occur due to time delays, and the merging of the 1989 amendments with the 1990 amendments. The management plan for the El Mirage Cooperative Management Area (1990) is consistent with the CDCA Plan. However, Amendment #16 provides the necessary planning conformance to fully implement the management plan and develop a regional recreational facility.

13-19

Page 3-22 statements in regards Category I desert tortoise habitat are not suitable for reference and should be deleted until such time as the category issue has been resolved. Comment regarding the expected low occurrence of tortoise due to OHV activity is speculative and may not be correct. It would be more appropriate to delete that sentence, since the preceding sentence "Systematic inventories..." covers the discussion on Affected Environment adequately.

13-19 The phrase "Management Category I" should be prefaced by the word "Interim". BLM has been using a similar category map for two years. The reference to Category I in the Environmental Assessment is incorrect since the entire El Mirage area is Category III. We also concur that inferring that OHV activity was solely responsible for tortoise decline is incorrect, because the El Mirage management plan does note that a variety of activities and uses besides OHV activities were likely involved in having a negative effect on wildlife including desert tortoise (see pages 3-4, 3-12, 3-13, Appendix A of the El Mirage Plan).

Amendments 17, 18 (PALEN, RICE VALLEY)

No comment on these proposals

Amendment 19 - TORTOISE CATEGORIES

Association comment in regards this amendment should be viewed in the context of cumulative action. While the Association has in the past, and will continue to have, the utmost appreciation and sensitivity for effective tortoise management, the Association strongly objects to management directives that put in place delineations and constraints without the benefit of site specific justification. Almost without exception, Association comment in the past where tortoise issues are discussed has emphasized the need to make management action relevant to the on the ground situation. This has been the recurring theme in the Association's response to the Rangewide Plan and Activity Plans (i.e. Rand-Fremont Valley).

13-20

13-20 See response to 12-7. The four Habitat Management Plans will provide for management prescriptions. They will also be plan amendments and provide an opportunity to review boundaries and categorizations. See page 2-14 of the environmental assessment for a discussion of how the criteria were applied.

While Amendment discussion states that these categories "would not impose any management constraints or resource uses on activities..." (page 2-13), the categories themselves identify and convey certain assumptions about land uses and tortoise management. This is evidenced by category description such as "Conflicts (are) resolvable" or "no commitment to major land use conflict." The implication is that the goal is attainable on these lands as long as the criteria for that category does not change.

Category characteristics need further definition: what constitutes high, medium, or low density, who decided what land area was essential to the population, how can categories be assigned when "Information concerning all these criteria may not be available or relevant for all categorizations" ???

Page 2-14 comment on OHV open areas neglects to consider that viable tortoise populations may exist and should be factored into the overall picture. It is arbitrary to "write off" these areas - these populations, while in a unique setting, can contribute to the research database and gene pool. That value should be recognized for its own sake, not relative to another area.

Page 2-14 Comment about tortoise data is misleading. Current populations may not be reduced in all areas - this should be stricken or at least modified to reflect that some populations have decreased. Transect and study plot data is only collected every specific area - there is no way such data, as is due to variations three or four years, and then questionable as to what variations in recording, can be used to extrapolate a desert wide picture. Delineation of the categories based on general, outdated, or speculative data is not acceptable. What is acceptable is identification of specific areas where current, irrefutable data does exist that paints a reliable picture of what's going on with the tortoise. The categories do not.

A question that has not been addressed is why the categories are deemed necessary. The BLM will manage for tortoise survival even if the categories are never authorized.

How can public comment in response to this proposal (redrawing the lines) even come close to approximating the actual on the ground situation?

Specific comments with regards the Western Mojave population:

In that an effort is underway by US FWS to identify critical habitat as part of the Recovery Plan, the BLM has initiated the scoping for the WMCMP, and Activity Plans are being written in an attempt to provide site specific management benefits for the tortoise, there is no reason why the Western Mojave Habitat Area should be considered in this discussion. The Association position is that categorization serves no valid purpose on its own, and when viewed in the context of current planning efforts, the categories are the least reflective of specific situations. In other words, the categories don't do justice to the real world, whereas site specific plans do, or at least come closer.

13-21

See response to 13-20.

13-22

The wording "write off" was not used, and there is a misunderstanding of the wording "irresolvable conflict". The latter refers to another use, OHV activities, being the major commitment for that area, and the desert tortoise as not being a constraint on that action (see Table 2-1, page 2-13). This does not preclude, as noted in Table 2-1, some mitigation; mitigation measures will be applied to the extent possible. However, the BLM cannot commit to the maintenance of a viable population in areas where human activities cause high mortality, tortoise populations are very low, or BLM holdings are small.

13-23

The tortoise density information is based on almost 3,000 tortoise sign transects. This information on relative density has been used to determine tortoise distribution and density. Although there is extrapolation between the transects and tortoise populations have declined significantly in some areas, the data is sufficient to determine general areas of management priority for the desert tortoise. The transects and study plot data are a sampling technique and a legitimate and scientific means of collecting and developing data. The data was subject to review by biologist from USFWS and CDFG as well as BLM. The transects and study plots are part of an ongoing research process. The preparation of the four Habitat Management Plans will provide for management action based on more "specific" area study.

13-24

As indicated on pages 2-12 and 2-13 of the Environmental Assessment, the BLM has directed all field offices with desert tortoise habitat to categorize habitat in accordance with the criteria specific in Table 2-1 on page 2-13 of the Environmental Assessment. The Desert Plan identified a single category of crucial habitat which is the No Action alternative. The tripart categorization is the result of the *Desert Tortoise Habitat Management on the Public Lands: a Rangewide Plan (1988)*. The four Habitat Management Plans to be prepared will provide for management prescriptions for the desert tortoise.

13-25

The boundaries of the categories may be changed in the habitat management plans which also function as Plan Amendments being prepared for the four desert tortoise management areas. The BLM has had interim categories for two years; this

Another argument that de serves consideration is the possibility that approved category boundaries may have to be amended once the plans are completed.

13-25 cont.

13-25 cont. amendment will formalize these. We do not know when the U. S. Fish and Wildlife Service (USFWS) will approve a Recovery Plan or designate Critical Habitat. It is true that categorization on its own serves no purpose; however, this is the reason for preparing the four habitat management plans of which the West Mojave Plan will be the first. The plans will develop the site specific management actions. The plans will necessarily include the U.S. Fish and Wildlife Services's recovery plan. It is also true that the boundaries may be amended, particularly, with the development of the desert tortoise plans, and as our knowledge of desert tortoise habitat increases.

Comments for the other three areas:

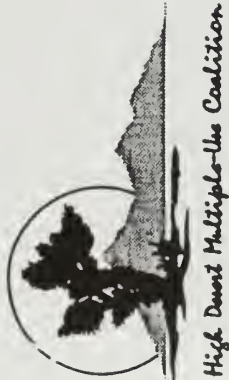
While the BLM must respond to public and internal pressure to manage for tortoise survival, such management does not depend on the categorization. It makes no sense to identify areas when data is insufficient and the USFWS efforts will take precedence. This proposed amendment action should be deferred pending FWS decisions on critical habitat and additional data collection.

In the event the BLM chooses not to defer the categorization, the BLM could do two other things:

- 1) only propose category boundaries around study plot locations where recent, irrefutable data exists; or
- 2) describe these classifications as "interim" only, with no implied or expressed meaning

13-26

13-26 See response to 13-22 and 13-23. Management of the desert tortoise is required by federal law, the Endangered Species Act and not public or internal pressures. The categories describe habitat not management prescriptions which would be derived from the four habitat management plans. Each one will incorporate the USFWS's recovery plan. Even though the categorization may be changed in the management plans currently in preparation or through subsequent plan amendment, there is no need to designate this categorization as interim once approved.



Bureau of Land Management
 California Desert District
 ATTN: Plan Amendments
 6221 Box Springs Blvd.
 Riverside, CA 92507-0714

December 14, 1991

Dear Sirs:

Please accept the following comments regarding the Proposed 1989/1990 California Desert Conservation Area Plan Amendments and Environmental Assessment.

AMENDMENT 1

The HDMUC supports the protection of these resources. However, all of the alternatives illustrated on the map are excessive. There is no reason for the boundary to follow section lines, the ACEC should be limited to the actual paleontological sites with a minimum of interconnecting acreage. Although the environmental assessment does not specifically indicate if any roads currently used by recreational fossil collectors would be closed to vehicular access, we are opposed to any closures of existing recreational routes.

- 14-1 Avocational and recreational collection of vertebrate fossils on public land without a permit is illegal. Alternatives B and C were designated for ease of management of paleontological resources. Vehicle access through the proposed ACEC on designated open routes would not be affected.
- 14-1
- 14-1

AMENDMENT 2

The HDMUC supports alternative B, no action. The current ACEC boundaries are adequate and the HDMUC is adamantly opposed to the enlargement of this ACEC by 734 percent. This area is too valuable for gem and mineral collectors and other recreation. In addition, question the statement that the quality of recreation will be improved in the long term. We also question the BLM's incessant need of interpretive signing. The addition of interpretive signing is often an advertisement which focuses more attention to valuable resources and results in more damage and manufactured conflicts. If visitors are truly interested in interpretation, they will contact the BLM or seek the information elsewhere.

- 14-2 Extending the ACEC designation to the expanded area would not affect gem and mineral collectors. Interpretive signing increases public knowledge and appreciation of the resource, and results in less vandalism and inadvertent damage to cultural resources, specifically rock art sites.
- 14-2
- 14-2

Continuation, NOT Confiscation
 P.O. Box 1167 • Ridgecrest, California 93556

AMENDMENT 3

We have no comment regarding amendment 2 at this time

AMENDMENT 4

The HDMUC supports the preferred alternative.

AMENDMENT 5

The HDMUC supports alternative A, the proposal to create 640 acre NNL/ACEC. With the today's current budget pressures, we question the need for the construction of day-use facilities. This funding would be more appropriately directed toward much need study and research of the respiratory disease afflicting the desert tortoise. Although we do not oppose limiting recreational shooting, we dispute the need for a ban on firearms of hunting, as implied in the last paragraph on page 2-4.

AMENDMENT 6

The HDMUC supports alternative B, no action. The adjacent University of California Natural Reserve should be adequate and we see no need to create an ACEC to protect plants that are not foreseeably jeopardized, are wide-spread, and are not listed as threatened or endangered. The designation of this ACEC would add another layer of unnecessary management.

AMENDMENT 7

The HDMUC supports alternative B, no action. This proposal offers no real justification except for the opportunity to call attention to the area and the possible justification of additional funding. This proposal is recognized on page 4-7 as only a minor benefit. We feel that this proposal is frivolous and insist that any available funding be used for more urgent needs. Additionally, we stand adamantly opposed to the closure of vehicular routes to protect, of all things, JOSHUA TREES. Joshua trees range widely on much of the desert and the impact of recreational vehicles on Joshua trees is remote at best.

14-3 See response to 13-7 and 13-12

AMENDMENT 8

The HDMUC supports alternative B, no action. We question the need to consider this proposed amendment. As noted on page 4-8, there would be no difference in the resource management for the two alternatives and we feel that the ENMSA plan adequately protects the resource values in this area. We are opposed to the closure of any more existing roads in this area.

14-4 See response to 13-14

AMENDMENT 9

The HDMUC support alternative B, no action. We question the need to consider this proposed amendment. As noted on page 4-9, there would be no difference in the resource management for the two alternatives and we feel that the ENMSA plan adequately protects the resource values in this area. This plan implies that there has been concern regarding recreational shooting. Is there any documented cases of injury to recreationists or researchers? We would be opposed to limitations on hunting in this area.

14-5

14-5 See response to 13-15. There have been no injuries; however, there have been several incidents of near misses to individuals.

AMENDMENT 10

While the HDMUC is not opposed to this proposal, it seems ridiculous to waste taxpayer money to even consider this designation at this time. This issue should only be addressed in the event that congress fails to designate this area as wilderness.

14-6

14-6 See response to 13-7. Wilderness designation for this area is pending before Congress. It is unknown when this legislation will be passed but it could be some time in the future. The special qualities of Kelso Dunes meet the ranking criteria for an ACEC under 43 CFR 1610.7-2.

AMENDMENT 11

Same as amendment 10

14-7

14-7 See response to 13-7. Wilderness designation for this area is pending before Congress. It is unknown when this legislation will be passed, but it could be some time in the future. The Turtle Mountains are currently designated as an NNL. The resources of the area meet the ranking criteria for an ACEC under 43 CFR 1610.7-2. The umbrella concept of the ACEC program warrants BLM recognition of the significance of the NNL designation.

AMENDMENT 12

The HDMUC supports alternative A, the designation of the Desert Lily Preserve as an ONA/ACEC.

AMENDMENT 13

Same as 10 and 11.

14-8

14-8 See response to 13-7. Wilderness designation for this area is pending before Congress. It is unknown when this legislation will be passed, but it could be some time in the future. The North Algodones Dunes are currently designated as an NNL. The resources of the area meet the ranking criteria for an ACEC under 43 CFR 1610.7-2. The umbrella concept of the ACEC program warrants BLM recognition of the significance of the NNL designation.

AMENDMENT 14

The HDMUC is not opposed to this proposal as long as a public right-of-way is maintained for all existing routes of travel across this property.

14-9

The proposed multiple use change would not affect vehicle use or designated open routes of travel.

AMENDMENT 15

The HDMUC supports alternative A.

AMENDMENT 16

The HDMUC supports alternative A.

AMENDMENT 17 and 18

We have no comments regarding amendments 17 and 18 at this time.

AMENDMENT 19

The HDMUC supports alternative B, no action. We are somewhat skeptical of the statement on page 2-13, "It would not impose any management constraints or resource uses on activities for the different categories". We believe this statement misleading and feel that this proposed amendment would, in fact, have considerable impact upon resources uses and activities.

14-10

As stated in the Environmental Assessment (page 4-20), subsequent actions, implemented through plan amendment or through the habitat management plans, might result in constraints on uses; however, these will receive environmental review when proposed. The categories themselves are administrative only. Both alternatives A and B would designate categories.

Thank you for this opportunity to express our concerns. For additional information or clarification, please contact Ron Schiller in the evenings at (619) 375-2629 or during working hours at (619) 939-2114.

Sincerely,



Ron Schiller, Chairman

MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

DEC 23 1991

Mr. Gerald E. Hillier
Bureau of Land Management
California Desert District
6221 Box Springs Boulevard
Riverside, California 92507-0714

Attention Plan Amendments

Dear Mr. Hillier:

Environmental Assessment for the Proposed 1989/1990
Amendments to the California Desert Conservation Area Plan

We have received the Environmental Assessment (EA) for the proposed 1989/1990 Amendments to the California Desert Conservation Area Plan (Plan). The EA considers the environmental consequences of accepting or rejecting each of 19 proposed amendments that include Areas of Critical Environmental Concern (ACEC), Multiple-Use Class changes, changes in both Multiple-Use Class and vehicle access, deletion of two ephemeral grazing allotments, and the delineation of desert tortoise management categories. The comments herein represent Metropolitan's response as a potentially affected public agency.

Metropolitan may enter into an agreement with the Coachella Valley Water District and the U.S. Bureau of Reclamation to test the feasibility of recovering water recharged to the aquifer below the East Mesa of Imperial County from the abandoned Coachella Canal that lies along the Sand Hills. The proposed East Mesa Recharge/Recovery Well Field Program, which includes four recovery wells, is located about four miles south of the southwest corner of the ACEC proposed to be created by Amendment 13.

Should the recovery test prove successful, available Colorado River water could be recharged to the East Mesa aquifer for later recovery. The amount of water recovered from the East Mesa would not exceed the amount previously recharged. For this reason, we believe recovery of water would not have an adverse effect on the natural resources of the proposed ACEC of Amendment 13 in the Plan.

Recharge and recovery of Colorado River water would result in more efficient use of available Colorado River resources which in the future will be more limited. Should

Mr. Gerald E. Hillier

-2-

08/21/1991

you have any questions regarding Metropolitan's interest in this matter, please contact Mr. John L. Scott, Junior Engineer, at (213) 250-7823.

Additionally, our review of the Plan indicates that Metropolitan has six facilities in the vicinity of your proposed Amendment 19. Metropolitan's Colorado River Aqueduct and five powerlines, located on easements or through fee title, traverse portions of the proposed Desert Tortoise Management Categories I and III in both a north/south and an east/west direction. The attached map shows Metropolitan's facilities in relation to your proposed Amendment 19. It will be necessary to consider these facilities in relation to your development of the Plan.

Metropolitan's powerline easement roads and access roads to the Colorado River Aqueduct are frequently patrolled by staff located at our Gene Field Headquarters near Parker Dam. There has been no take of desert tortoise along these roads, and Metropolitan is concerned that Alternative A will create restrictions on our use and patrol of these roads. As part of Metropolitan's daily operations and maintenance, we must have access to these roads and to the Colorado River Aqueduct. Until the policies proposed for each management category are clearly defined, it is difficult for Metropolitan to assess the ramifications of the proposed Amendment 19 relative to our operations and maintenance activities. Therefore, Alternative B to proposed Amendment 19--No Action--is preferred by Metropolitan at this time. We request that your draft Environmental Impact Statement define the establishment of Desert Tortoise Management Categories and how these designations would affect Metropolitan's facilities. For more information on Metropolitan's concerns in this area, please contact Mr. Jack Noblitt, Superintendent, at (619) 663-4911.

We appreciate the opportunity to provide input to your planning process. If we can be of further assistance, please contact me at (213) 250-6272.

Very truly yours



Kathleen M. Kunysz
Manager, Environmental Affairs

JBA:led/C369

Attachment

15-1

Both Alternatives A and B would designate categories for public land. The categories simply designate desert tortoise habitat; no management constraints are identified. Management prescriptions will be developed in the four Habitat Management Plans and subject to public review. See also response to 12-7.



DEPARTMENT OF THE ARMY
HEADQUARTERS, NATIONAL TRAINING CENTER AND FORT IRWIN
FORT IRWIN, CALIFORNIA 92316 5000
December 18, 1991

REPLY TO
ATTENTION OF

Directorate of Engineering and Housing

Bureau of Land Management
California Desert District
ATTN: Plan Amendments
6221 Box Springs Blvd
Riverside, California 92507-0714

Dear Mr. Hillier,

In reference to the Proposed 1989/1990 California Desert Conservation Area Plan Amendments and Environmental Assessment, the National Training Center would offer these comments. The proposed New ACEC at Manix would be detrimental to the ongoing efforts of establishing a tank trail from the 29 Palms Marine Corps Base to the NTC. The efforts of the U.S. Marine Corps and U.S. Army to maximize joint use will be risked if this ACEC is approved without providing for passage of the tank trail. Therefore, the National Training Center request that the area highlighted on the attached map be excluded.

Please contact the undersigned at (619) 386-3433 if you would like to discuss this matter further.

Thomas M. Cripp
Acting Director of Engineering
and Housing

16-1

16-1

The designation of an ACEC does not preclude the issuance of right-of-ways across public lands. An ACEC designation recognizes that an area has significant values and establishes special management measures to protect those values. An EIS will be required to evaluate the impacts of the proposed tank trail which would include impacts to the unique paleontological resources that have been identified in the area. The exclusion of the area you have highlighted does not encompass the proposed route of the tank trail as shown on the Marines right-of-way application which is proposed across the center of the proposed ACEC. A proposed project does not negate the importance of recognizing and managing known significant resources.

Appendices

APPENDIX A

SPECIAL AREA DESIGNATIONS RECOMMENDED FOR DELETION*

Former Special Areas	Designation**		Rationale for Deletion of Special Area Designation
	Former	Present	
Amargosa Canyon	NA	ACEC	Amargosa Canyon ACEC (No. 13) (CDCA Plan, 1980)
Amargosa Canyon/Dumont Dunes	NA	ACEC	Amargosa Canyon ACEC (No. 13); Dumont Dunes OHV Area (CDCA Plan, 1980)
Argus Mountain	PA	-----	Did not meet WSA or ACEC criteria
Black Mountain (El Paso Mountain)	PA	-----	In El Paso WSA (CDCA-164) (CDCA Plan, 1980)
Bow Willow Palms	RNA	-----	In In-Ko-Pah WSA (CDCA-368) (CDCA Plan, 1980)
Carruthers Canyon	ONA	-----	In New York Mountains ACEC (No. 31), (CDCA Plan, 1980)
Cerro Coso College	RNA	-----	Not qualified for ACEC status
Crucifixion Thorn	NA	-----	In Yuha Basin ACEC, (No. 64) (CDCA Plan as amended, 1986)
Darwin Falls	ONA	ACEC	Darwin Falls ACEC (No. 6), (CDCA Plan, 1980)
Dead Indian Creek	NA	NSA	In Santa Rosa Mtns. National Scenic Area (CDCA Plan Amendment, 1990)
Desert Tortoise	NA	RNA/ACEC	Desert Tortoise Research Natural Area (ACEC No. 22) (CDCA Plan, 1980)
Dove Springs, Butterbread, Water Canyon	NA	ACEC	In Jawbone/Butterbread ACEC (No. 20), (CDCA Plan, 1980)
Eureka Dunes	NA	ACEC	Eureka Dunes ACEC (No. 3), (CDCA Plan, 1980)

SPECIAL AREA DESIGNATIONS RECOMMENDED FOR DELETION (cont.)

Former Special Areas	Designation		Rationale for Deletion of Special Area Designation
	Former	Present	
Fossil Canyon	NA	ACEC	In Coyote Mountains ACEC, (No. 62), (CDCA Plan, 1980)
Great Falls Basin	RNA	ACEC	Great Falls Basin/Argus Range ACEC, (No. 12), (CDCA Plan, 1980)
Indian Springs	ONA	-----	In New York Mtn. ACEC, (No. 31), (CDCA Plan, 1980)
Jacumba	ONA	-----	In recommended In-Ko-Pah WSA (CDCA-386), (CDCA Plan, 1980)
Milpitas Wash	RNA	-----	Within a habitat management area.
Mopah Springs	NA/NRL	ACEC	Incorporated into Turtle Mtn. ACEC (CDCA Plan, 1989-90)
Rainbow Basin	ONA/NRL	ACEC	Rainbow Basin/Owl Canyon ACEC, (No. 39), (CDCA Plan, 1980)
Signal Mountain	RNA	-----	In Yuha Basin ACEC (No. 64), (CDCA Plan, 1980)
Trona Pinnacles	NA/NRL	-----	Trona Pinnacles ACEC, (No. 16), (CDCA Plan 1980)
Western Mojave Saltbush	RNA	ACEC/UPA	Barstow Woolly Sunflower ACEC, (No. 36), (CDCA Plan 1980); Western Mojave Saltbush UPA

* Plan Clarification

** Special Area Designations: ACEC = Area of Critical Environmental Concern; NA = Natural Area; NRL = National Recreation Lands; NSA = National Scenic Area; ONA = Outstanding Natural Area; PA = Primitive Area; RNA = Research Natural Area; UPA = Unusual Plant Assemblage; WSA = Wilderness Study Area

APPENDIX B

APPENDIX B AMENDMENTS DROPPED, DEFERRED OR HANDLED THROUGH ADMINISTRATIVE ACTION

<u>Prelim. Amend. No.</u>	<u>Amendment</u>	<u>Proponent's Reason for Submission</u>	<u>BLM's Remarks</u>
89-P-1	Designate an ACEC at Cadiz Dunes (BLM, Needles RA)	These low, vegetated dunes present a unique opportunity for hiking, camping, photography, and the study of interdunal flora and fauna relationships. They are readily accessible by an unmaintained road and are particularly photogenic in the early morning and late evening. Despite the accessibility, a very real sense of solitude can be experienced here. Key resources: scenic quality, vegetation, and wildlife.	ACEC status is not needed. The tallest portion of the dunes at the north end is protected by a vehicle closure. Resources can be managed by controlling recreational use.
89-P-5	Revise the boundary of the Whipple Mountain ACEC (#53) to include Whipple Wash. (BLM, Needles RA)	This extension of the Native American ACEC into the Whipple Wash would acknowledge the botanical values and scenic quality of this unique area.	<u>Defer.</u> Resubmit after further inventory and research has been done to define boundary of area to be included.
89-P-16a	1) Revise the portion of the Livestock Grazing Element of the CDCA Plan on grazing restrictions in desert tortoise habitat. (BLM, Desert District Office)	The CDCA Plan established procedures to allow sheep grazing within highly crucial and crucial desert tortoise habitat, with the goal of maintaining or enhancing tortoise populations. Data from Bureau desert tortoise trend plots reveal that a significant decline in tortoise population is occurring in the West Mojave Desert. All resources and uses are being analyzed for their possible contribution to these declines. Authorization of sheep grazing and present restrictions need to be reviewed and studied for possible connections.	<u>Defer.</u> CDCA Plan amendments on livestock grazing will be addressed in the Habitat Management Plans for the CDCA's four Habitat Management Areas for the desert tortoise. Further analysis of the effect of grazing on the desert tortoise and its habitat will be made, and the restriction for ephemeral forage for livestock grazing will be adjusted if necessary. Each HMP will be subject to plan amendments and NEPA requirements, including public review.
89-P-16b	Increase BLM's requirement for ephemeral forage for livestock grazing from 200 or 350 lb/acre (dry weight) to 1,000 lb/acre within desert tortoise crucial habitats. (Richard Spotts, Defenders of Wildlife)		
89-P-22	Eliminate all subsidized grazing in the East Mojave National Scenic Area. (Peter Burk)	New data not available in 1980: 1) Lack of public input and lack of updated professional inventory make it necessary to either redo all the EMNSA AMPs (allotment management plans) or eliminate grazing altogether. The latter would be cheaper.	<u>Drop.</u> No new data was presented which was not considered when the CDCA Plan was developed. 1) AMP's will continue to be subject to public review in accord with the District's policy of public involvement in the decision process.

AMENDMENTS DROPPED, DEFERRED, OR HANDLED
THROUGH ADMINISTRATIVE ACTION

Prelim.
Amend. No.

Amendment

Proponent's Reason for Submission

BLM's Remarks

89-P-22
(cont.)

2) Taxpayers can no longer afford subsidized grazing on marginal lands such as the EMNSA.

2) Congress directs the Secretaries of Interior and Agriculture to collect fees for grazing use on Federal lands and also determines when there will be a change in the fee system.

3) The desert tortoise and bighorn sheep are at risk, and their populations are declining when subsidized grazing occurs. Eliminating grazing in the EMNSA would stabilize and increase tortoise and bighorn sheep populations in the EMNSA. The East Mojave is a de facto wildlife park. Eliminate cattle grazing before this wildlife resource is lost. We cannot sit idly by while cattle trample tortoise eggs and tortoise burrows and eat the same plants as tortoises. Since the choice seems to be cattle or tortoises, we want to protect tortoises by eliminating cattle.

3) Management of desert tortoise habitat in the East Mojave will be analyzed during preparation of the Ivanpah-Shadow-Kelso and Fenner Chemehuevi Habitat Management Plans which will be initiated in 1992. Cattle grazing and other potentially conflicting uses will also be evaluated. Listing of the tortoise as a threatened species will necessitate Section 7 consultation with the U.S. Fish and Wildlife Service. The consultation request on the Desert District cattle grazing program is in preparation.

The East Mojave has sustained cattle grazing for more than 100 years, and the most thriving bighorn sheep populations in the CDCA are in the East Mojave - some within or adjacent to allotments. The BLM is cooperating with the California Department of Fish and Game in studying whether bighorn sheep diseases are caused by the presence of livestock. Future plan amendments will be considered if these findings indicate a conflict between bighorn sheep and cattle use.

4) The GAO Rangeland Management Report of June 1980 states the need for current inventory on range conditions and trend.

4) The GAO report did not cover the Desert District. Since completion of the CDCA Plan, the Needles RA has established and implemented a program for monitoring range conditions, including those located in the EMNSA.

**AMENDMENTS DROPPED, DEFERRED, OR IANDLED
THROUGH ADMINISTRATIVE ACTION**

<u>Prelim. Amend. No.</u>	<u>Amendment</u>	<u>Proponent's Reason for Submission</u>	<u>BLM's Remarks</u>
89-P-18	Adjust Multiple-Use Class (MUC) designations to be consistent with tortoise management categories. (BLM, District Office).	Directives for managing the desert tortoise in Category I and Category II areas are consistent with the MUC guidelines for Class "L" and in some cases are more restrictive.	<u>Defer.</u> Changes in Multiple Use Class designations will be considered when the desert tortoise category boundaries are finalized during preparation of the Habitat Management Plans.
89-P-21	Modify the Barstow to Las Vegas motorcycle race course, as established in the 1982 CDCA plan amendments in two locations. (BLM, Needles RA)	<u>Segment A:</u> Relocate the race course segment between Soda Lake and Interstate 15 to outside the East Mojave National Scenic Area, as recommended in the Scenic Area Plan. <u>Segment B:</u> Bypass the area adjacent to the existing race course near the Colosseum Gold Mine in the Clark Mountains. The mine has pushed bighorn sheep into this area.	<u>Drop.</u> The proposal was replaced by Amendment 89-P-23, which was subsequently replaced by an amendment to revise the portion of the Recreation Element of the CDCA Plan which addresses competitive and noncompetitive motorized vehicle events (see proposal 89-P-27).
89-P-23	Delete Barstow-to-Las Vegas race course from CDCA Plan. (BLM, District Office)	The Barstow to Las Vegas race course was added to the CDCA Plan as a 1982 plan amendment. The event has occurred annually since 1983. In the intervening years, adjustments were made in the course to reduce impacts on wilderness study areas (WSAs), the East Mojave National Scenic Area (EMNSA), private lands, the desert tortoise, and other resources. Monitoring showed that resources were still receiving negative impacts. On an overall basis, it is not possible to meet current criteria of environmental acceptability (the Endangered Species Act and BLM's Desert Tortoise Rangeland Plan).	<u>Drop.</u> This proposal was replaced by an amendment to revise the Recreation Element of the CDCA Plan relating to competitive and noncompetitive motorized vehicle events (see Proposal 89-P-27).

**AMENDMENTS DROPPED, DEFERRED, OR HANDLED
THROUGH ADMINISTRATIVE ACTION**

<u>Prelim. Amend. No.</u>	<u>Amendment</u>	<u>Proponent's Reason for Submission</u>	<u>BLM's Remarks</u>
89-P-24	Delete Stoddard Valley-to-Johnson Valley race course from CDCA Plan. (BLM, District Office)	The Stoddard Valley to Johnson Valley, Johnson Valley to Parker, and Parker 400 race courses were identified in the CDCA Plan in 1980 to provide opportunities for long distance racing. Each of these routes crosses the habitat of the desert tortoise. The dramatic decline in tortoise population in recent years, which led to the emergency listing of the tortoise as a Federally endangered species, has changed the basis of these courses would have to conform to the Endangered Species Act and the Bureau's Desert Tortoise Rangeland Plan. To allow use of these courses for the purpose intended in the CDCA Plan would cause unacceptable impacts on both the desert tortoise and its habitat.	Same as Proposal 89-P-27.
89-P-25	Delete Johnson Valley-to-Parker race course from CDCA Plan. (BLM, District Office)		Same as Proposal 89-P-27
89-P-26	Delete Parker 400 race course from CDCA Plan. (BLM, District Office)		Same as Proposal 89-P-27
89-P-27	Prohibit competitive motorized vehicle events in desert tortoise management Categories I and II. (BLM, District Office)	Unlike users of other roads, participants in competitive events frequently depart from previously traveled roadways and often travel at speeds which preclude avoidance of tortoises. Competitive events also attract spectators and support personnel who spend time in OHV free-play, collecting, and other activities harmful to tortoise populations. Pits, start cones, and parking areas are extremely deleterious to tortoises because of devegetation and soil compaction. For these purposes, "competitive events" are those in which speed, passing, and finishing first are important elements. Examples include hare-and-hound, scrambles, and enduros.	<u>Defer.</u> Address this topic in an amendment to the Recreation Element of the CDCA Plan to be considered in 1991. The amendment is intended to develop a long range strategy for the management of organized motorized vehicle events on the public lands of the California Desert outside of designated open areas. The amendment will define the conditions under which competitive and noncompetitive motorized events can be permitted on public lands in the CDCA and will attempt to streamline the BLM's OHV event permitting process.

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(June 1984)

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