

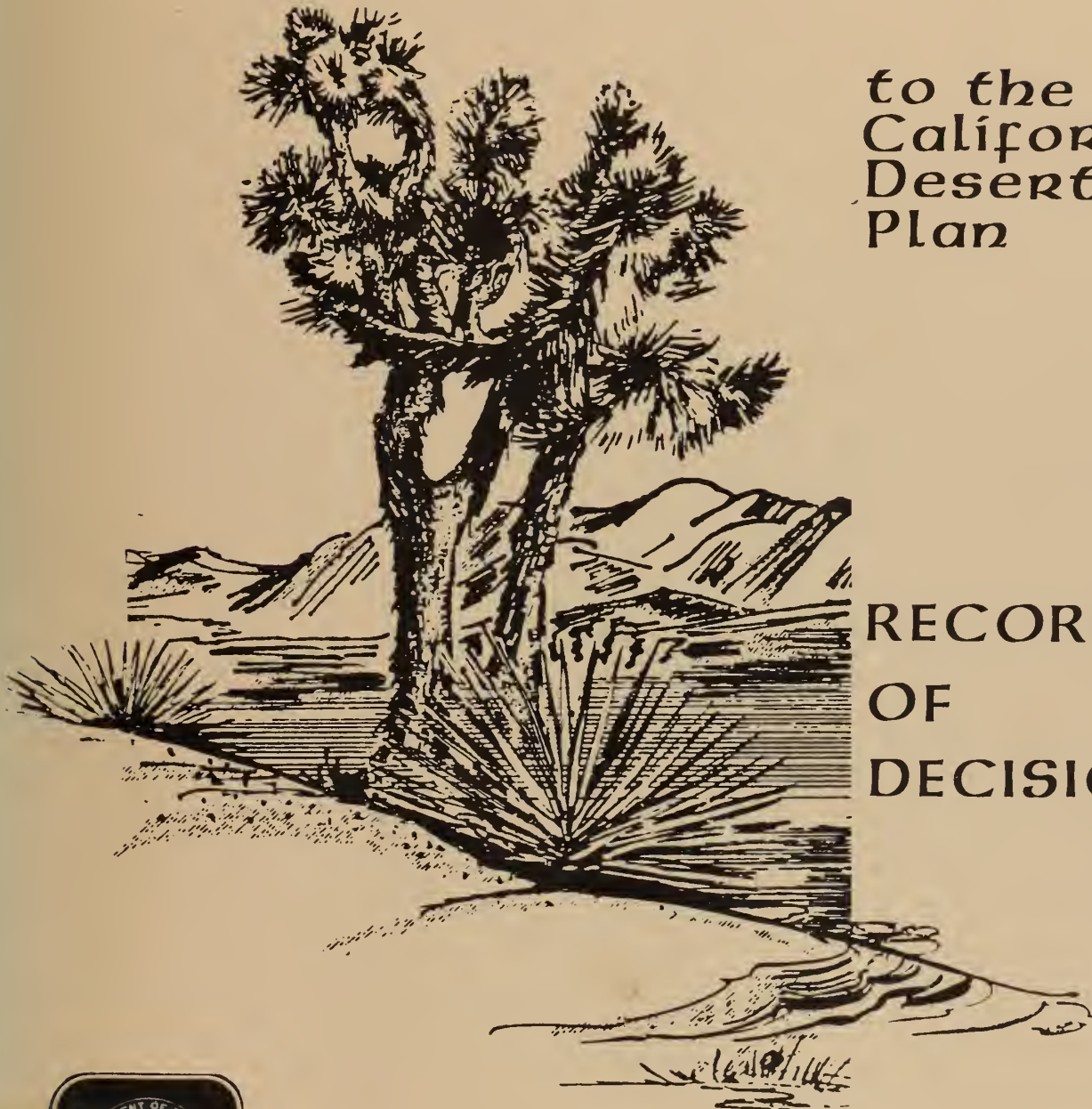
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1987 PLAN AMENDMENTS

to the
California
Desert
Plan



RECORD
OF
DECISION



U.S. Department of the Interior
Bureau of Land Management
Riverside, California
SEPTEMBER, 1988

19381786

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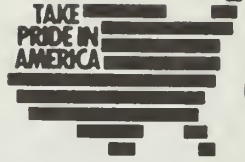


United States Department of the Interior

BUREAU OF LAND MANAGEMENT

CALIFORNIA DESERT DISTRICT

1695 Spruce Street
Riverside, California 92507



04
765
CA
1314
487
547
C2

IN REPLY
REFER TO:

IN REPLY REFER TO:

1600
(CA-060.23)

AUG 31 1988

Memorandum

BLM LIBRARY

To: State Director (CA-910)
From: District Manager, California Desert
Subject: 1987 Amendment Decision

Enclosed is the Record of Decision for the 1987 amendment review of the California Desert Plan indicating my approval of the amendments.

The enclosed document is provided for your review and concurrence.

Enclosure

BLM LIBRARY

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

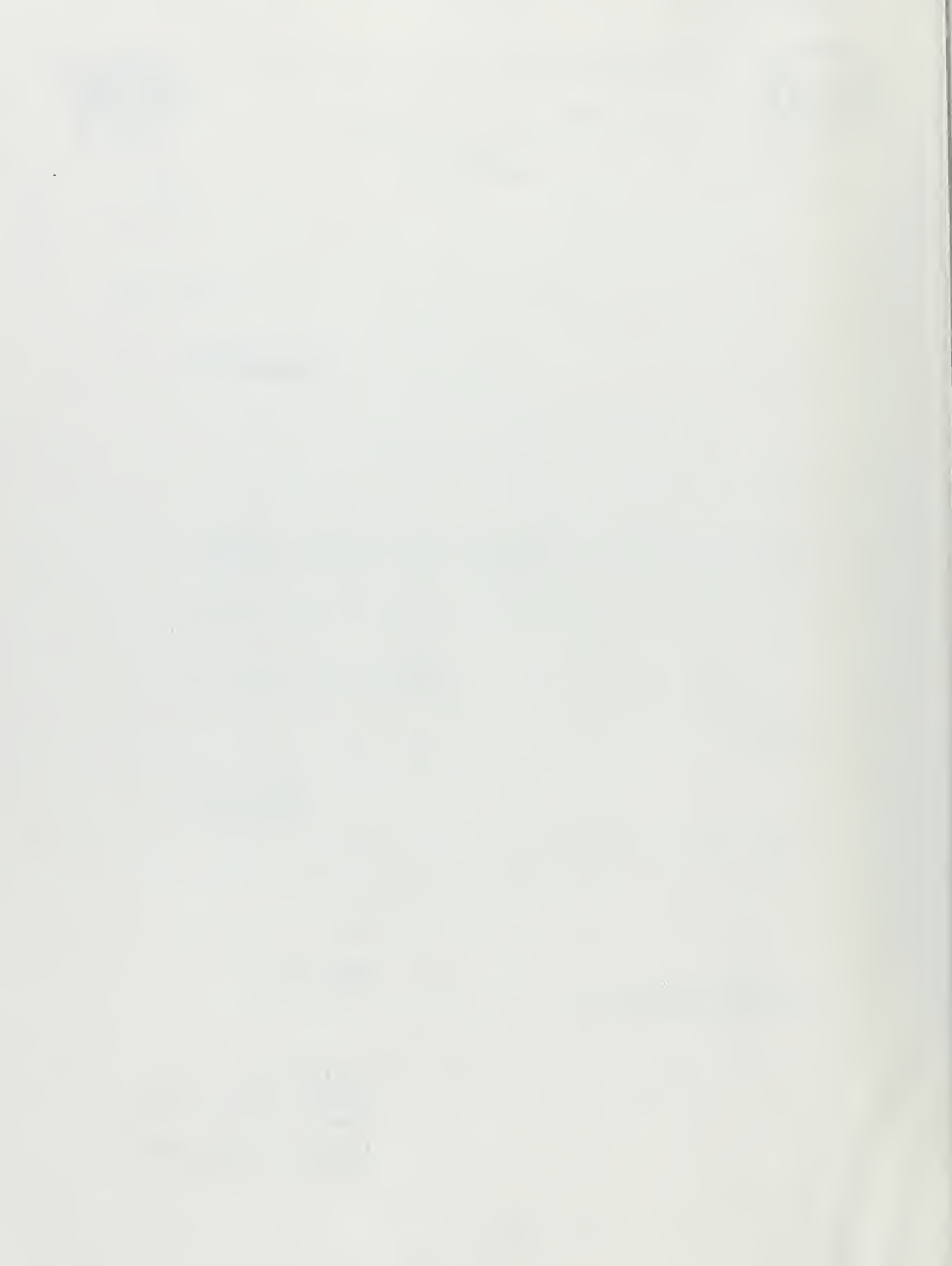
Ed Huxley
State Director, California

SEP 02 1988

Date

**BLM LIBRARY
SC-324A, BLDG. 50
DENVER FEDERAL CENTER
P. O. BOX 25047
DENVER, CO 80225-0047**

*Take pride in your California Desert Conservation Area
A National Treasure.*



RECORD OF DECISION

In accordance with Chapter 7 of the California Desert Conservation Area (CDCA) Plan (1980) and with 43 CFR 1610.5-5, the Bureau of Land Management has conducted the seventh amendment review of the plan.

Proposals for amendments were accepted during a 31-day period from February 28 to March 31, 1987. Twenty-eight amendments were proposed by the public and by BLM staff. Each of the 28 amendments were screened by BLM management and by the California Desert District Advisory Council according to the following criteria:

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

Of the twenty-eight (28) proposals sixteen (16) met the criteria. These sixteen (16) were combined into twelve (12) proposals and were analyzed by this environmental assessment. Of the remaining twelve (12) proposals, eleven (11) were rejected from consideration or will be handled by methods more appropriate than the amendment procedure, as described in Appendix B (tables B-1 and B-2). Consideration of the last proposal has been deferred to a later date.

The public comment period on the EA extended from October 16, 1987 to December 11, 1987. Thirty-two (32) written comments were received. Oral comments were accepted at the October 30, 1987 meeting of the Advisory Council in Ridgecrest

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

Each amendment is described below and the environmentally preferred alternative is identified except when there is no significant difference. All letters received from the public, and responses to specific comments, are given in the Comments and Response section of this Record of Decision.

Finding of No Significant Impact

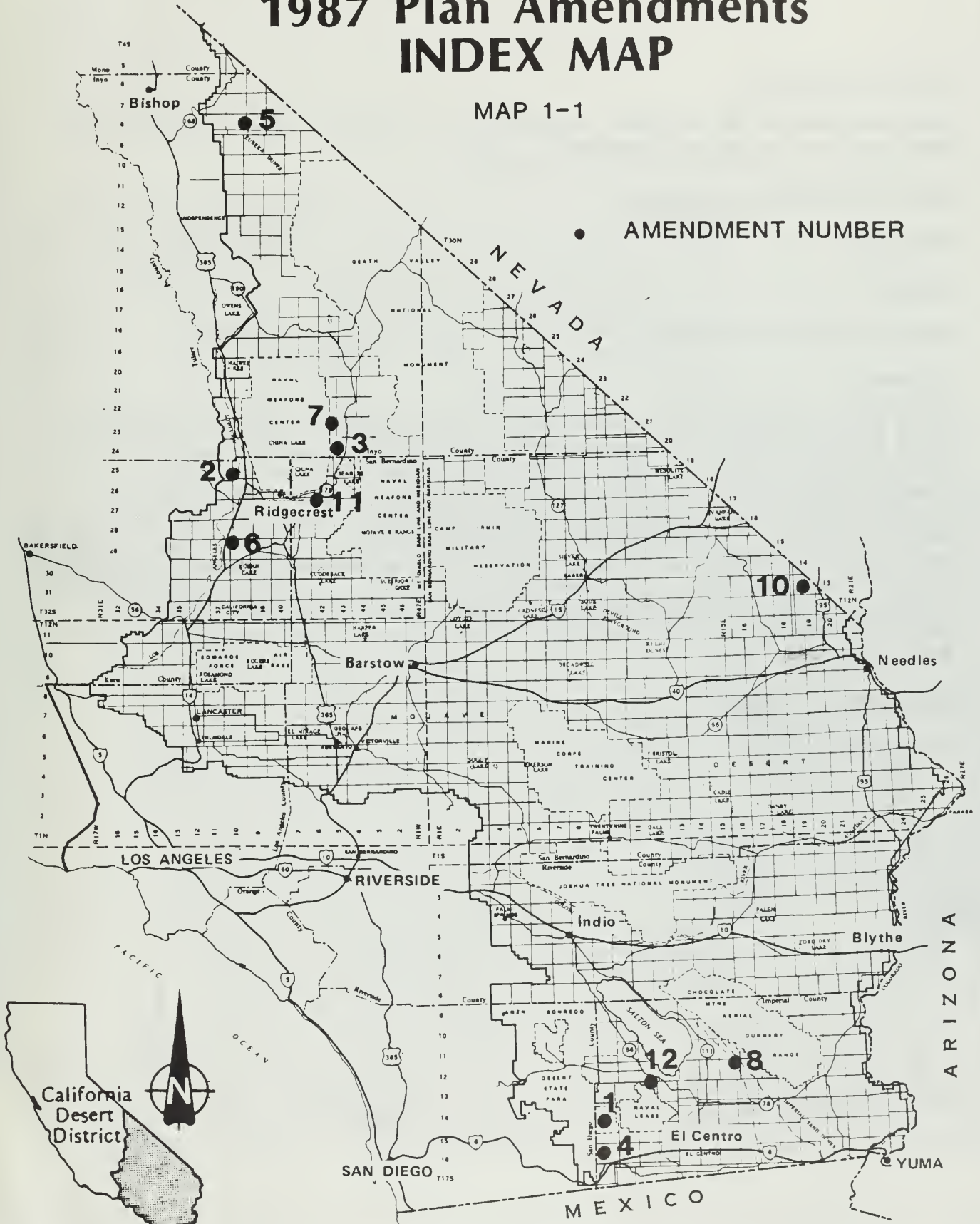
The environmental assessment identified no significant effects on the human or the natural environment. Therefore, an environmental impact statement is not required.

CALIFORNIA DESERT CONSERVATION AREA

1987 Plan Amendments INDEX MAP

MAP 1-1

● AMENDMENT NUMBER



AMENDMENT ONE

ACEC DESIGNATION FOR WEST MESA

Proposed Amendment

Designate an ACEC for wildlife, botanical, and cultural resource values in the West Mesa area of Imperial County.

Other Alternatives Considered

No Action.

Decision

Accept Proposed Amendment.

Rationale

Since this area was within a U.S. Bureau of Reclamation withdrawal, leased to the U.S. Navy, it was not considered during the CDCA planning process. As part of a 1985 plan ammendment, field studies showed the area to have extremely high populations of the flat-tailed horned lizard (FTHL) and the largest amount of crucial FTHL habitat currently existing. The FTHL is a BLM sensitive and U.S. Fish and Wildlife Service candidate species. Also present are cultural resources associated with the Lake Cahuilla shoreline and with localized ephemeral ponds. In addition there are two populations of Pilostyles thurberi and Astragalus crotalariae, two plant species listed by the California Native Plant Society. Off-road vehicle use threatens all of these resources.

Implementation Needs

ACEC Management Plan.

District Manager

5/23/88

Date

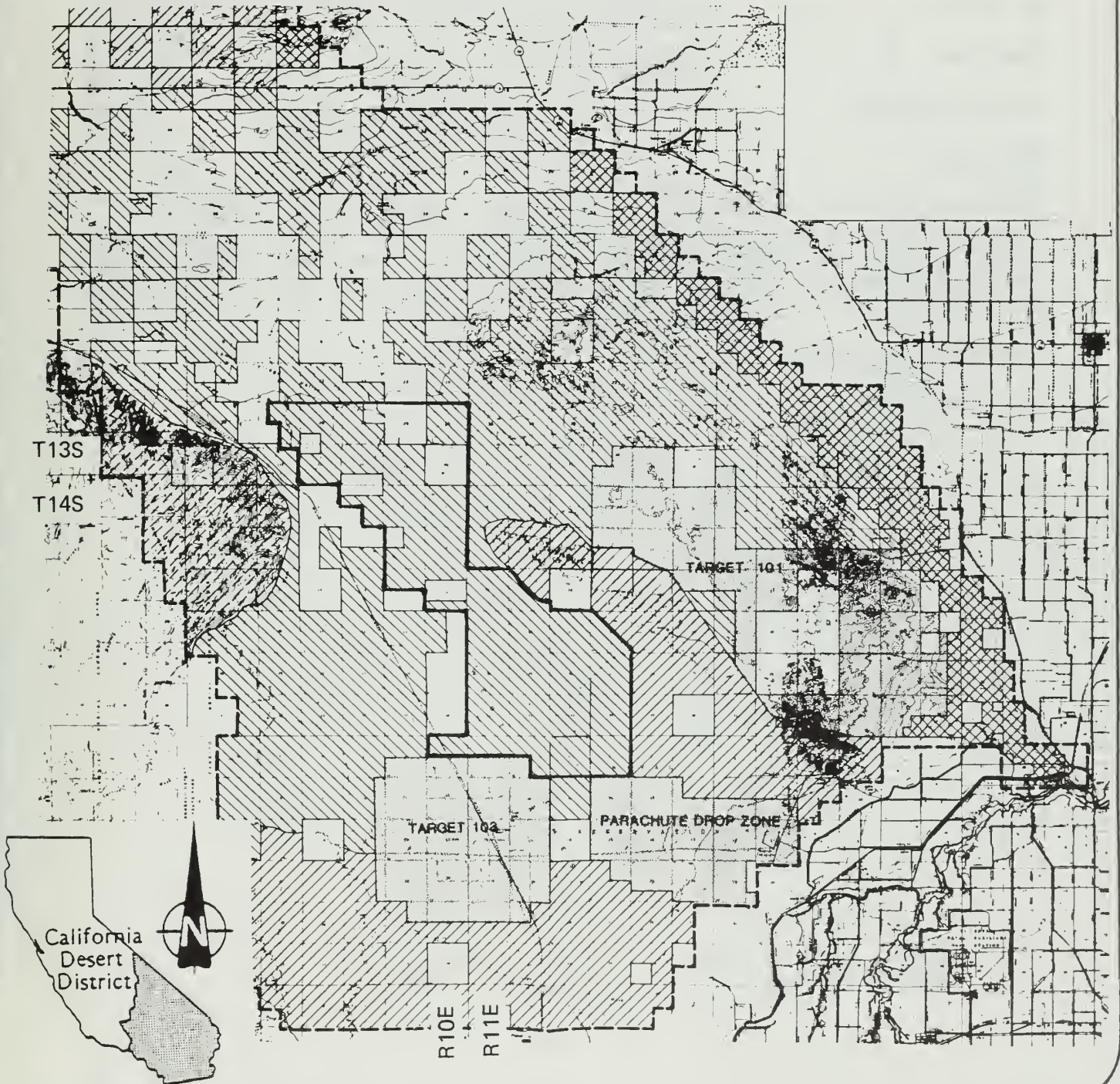
AMENDMENT 1

New ACEC-West Mesa (Imperial County)

LEGEND

- Study Area Boundary
- ▨ Class "C"
- ▧ Class "I"
- ▩ Class "L"
- ▤ Class "M"
- Unclassified (Navy Withdrawal)
- Patented Land

Proposed ACEC Boundary 



AMENDMENT TWO

ACEC DESIGNATION SHORT CANYON

Proposed Amendment

Designate the entire drainage of Short Canyon, Kern County, as an ACEC.

Other Alternatives Considered

No Action.

Decision

Accept Amendment.

Rationale


The recently completed AMP for the Walker Pass Common Allotment requires construction of a fence across the bottom of the canyon. This will eliminate grazing impacts on plants. An ACEC designation will have many benefits including measures to promote nature study and to provide aids for visitor interpretation.

Implementation Needs

ACEC Management Plan.



District Manager

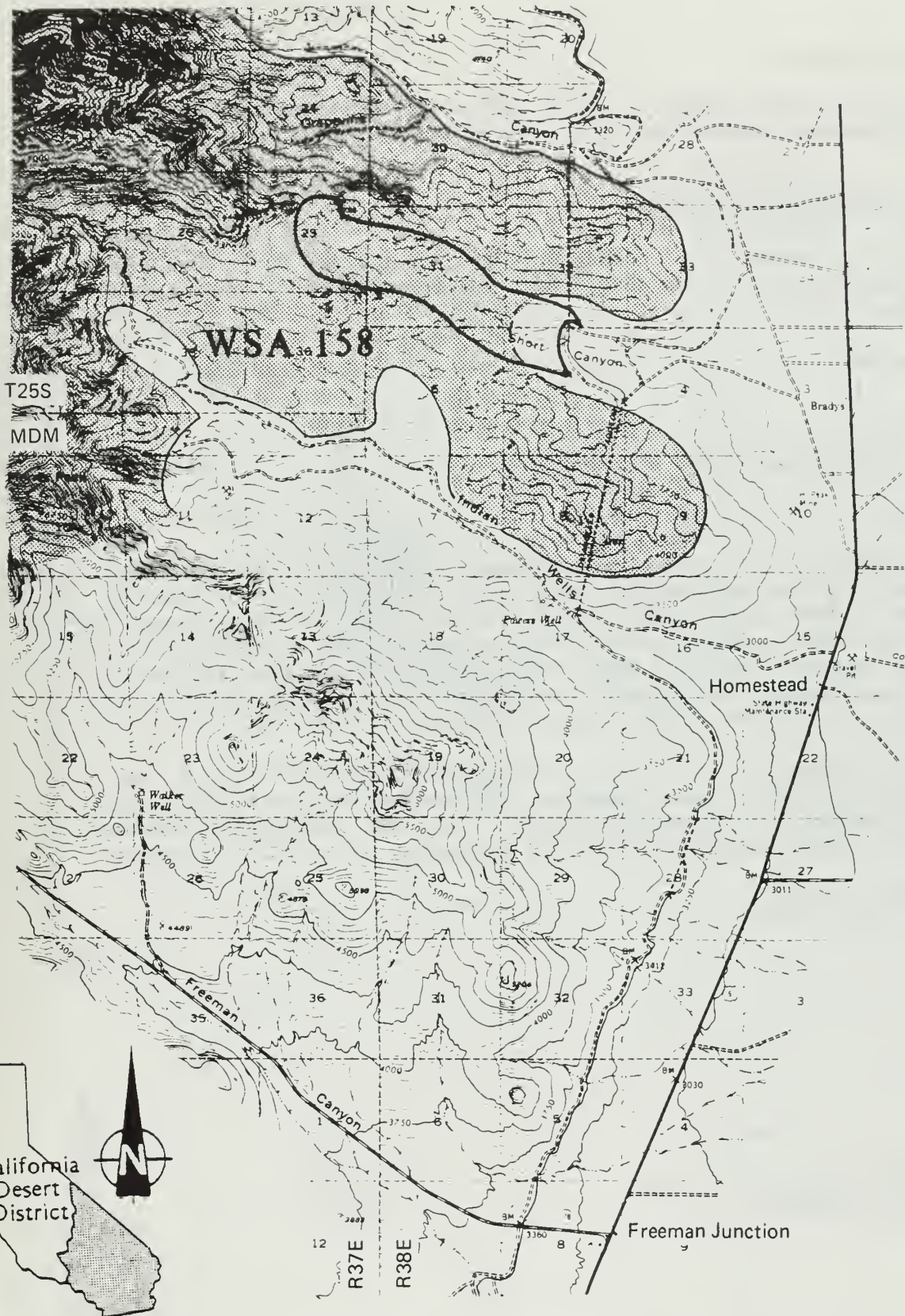


Date

AMENDMENT 2

New ACEC- Short Canyon

Proposed ACEC Boundary 



AMENDMENT THREE

MODIFY BOUNDARY OF GREAT FALLS BASIN ACEC

Proposed Amendment

Modify boundary to incorporate lands containing additional springs, riparian habitat and scenic resources and to delete the disturbed area around the Ruth Mine.

Other Alternatives Considered

- B. Modify the boundary to include only the Great Falls Basin area; the northern portion of the ACEC, which includes Homewood Canyon, would be deleted.
- C. No action.

Decision

Accept Proposed Amendment.

Rational

The BLM's Great Falls Basin ACEC Management Plan recommended the proposed amendment. The current boundary does not include important habitat for the Inyo brown towhee, but it does include the unsightly Ruth Mine area. The areas to be added contain springs and riparian habitat which are important to the towhee and are presently being impacted by public activities such as uncontrolled vehicle use, camping and trash disposal. Removal of the Ruth Mine would increase the overall scenic integrity of the ACEC.

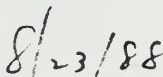
The first alternative was not acceptable. The northern portion is not primarily a residential zone, and the ACEC applies only to public lands. Critical habitat is a formal designation. The ACEC designation creates priority for BLM to develop protective management plans for the habitat.

Implementation Needs

None.



District Manager



Date

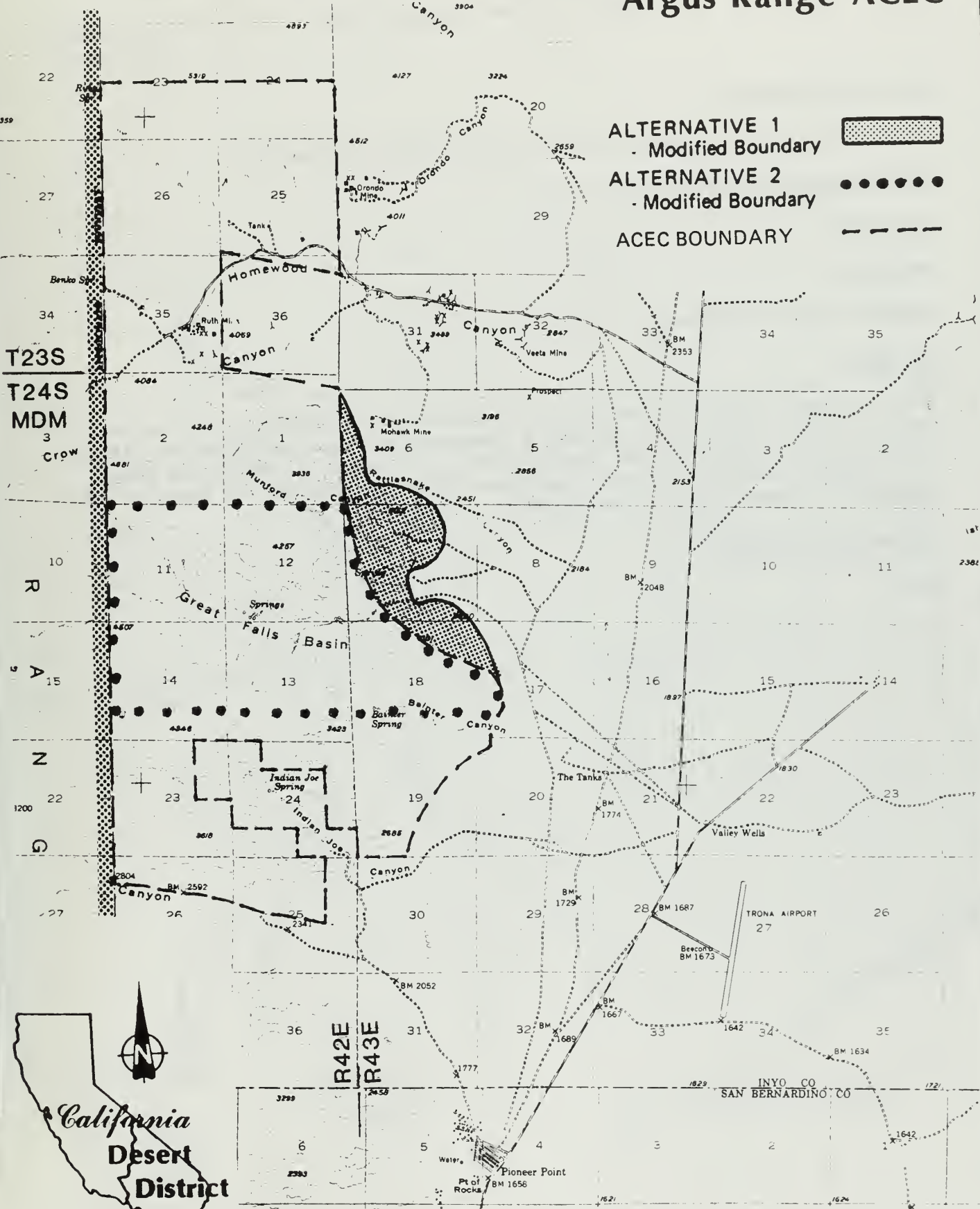
AMENDMENT 3

Great Falls Basin/ Argus Range ACEC

ALTERNATIVE 1
- Modified Boundary

ALTERNATIVE 2
- Modified Boundary

ACEC BOUNDARY



AMENDMENT FOUR

DELETE COYOTE MOUNTAINS ACEC

Proposed Amendment

Delete the current designation for the Coyote Mountains ACEC.

Other Alternatives Considered

No Action.

Decision

Accept Proposed Amendment.

Rationale

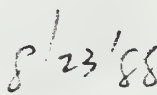
The Coyote Mountains ACEC was initially accorded this status based upon best available data. Prior to preparing a management plan, a sample investigation of the ACEC was conducted and predicted values as noted in the Desert Plan could not be verified. Cultural resources appear too sparse and insignificant compared to others found in the desert.

Implementation Needs

None.



District Manager



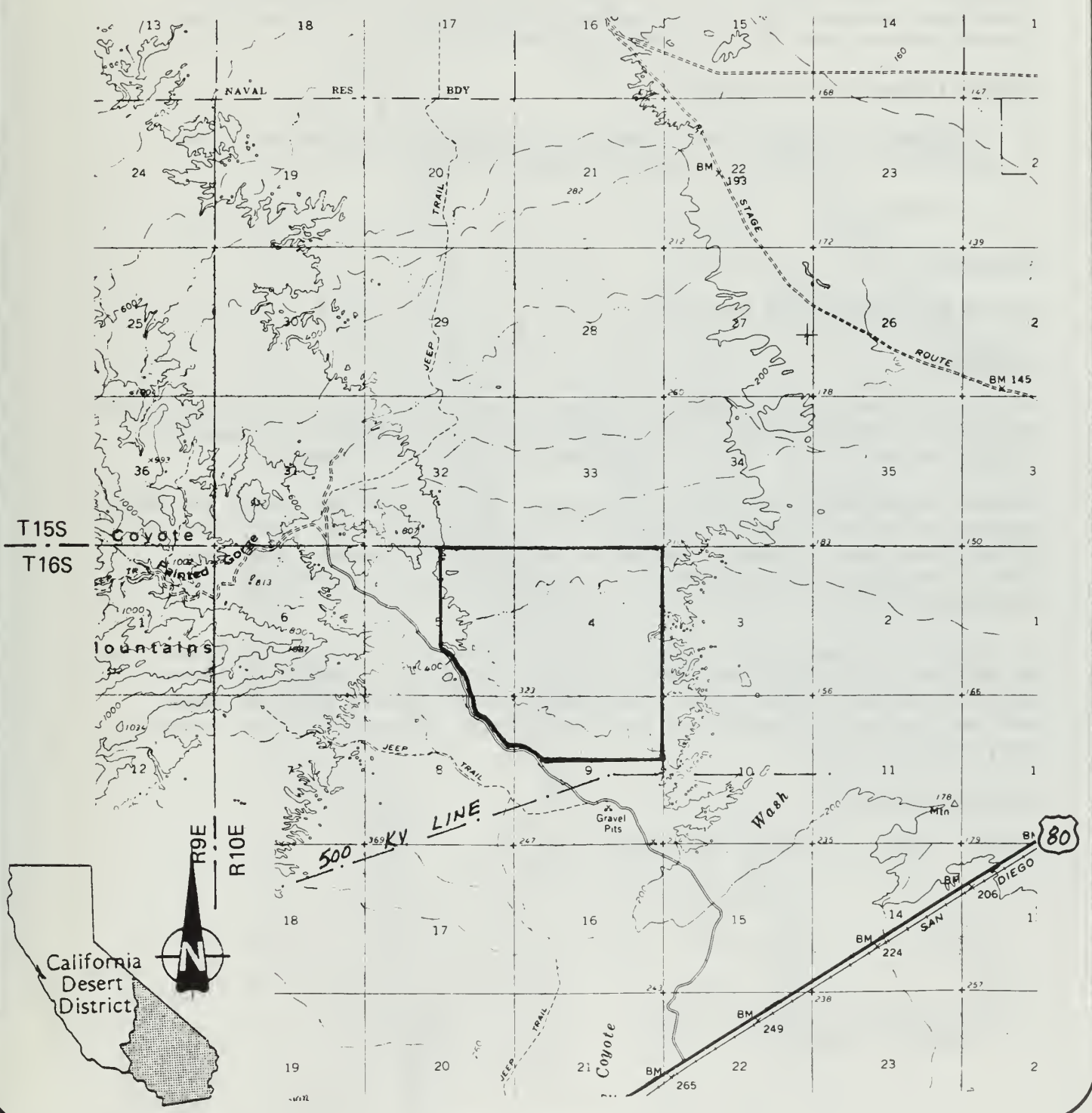
Date

AMENDMENT 4 Coyote Mountains ACEC

ACEC Boundary



ALTERNATIVE A
Delete ACEC



T15S
T16S



AMENDMENT FIVE

DESIGNATE SIX HABITAT MANAGEMENT AREAS

Proposed Amendment

Designate six (6) habitat management areas (HMA) in Mono and northern Inyo counties. These would be the East Slope White Mountain HMA; Soldier Pass-Piper Mountain HMA; Sylvania Mountains HMA; Last Chance Range HMA; Cowhorn-Waucoba HMA; and the North Coso Range HMA.

Other Alternatives Considered

- B. Designate four HMAs: East Slope White Mountain; Soldier Pass-piper Mountain; Last Chance Range and Cowhorn-Waucoba.
- C. No action.

Decision

Accept the Alternative B.

Rationale

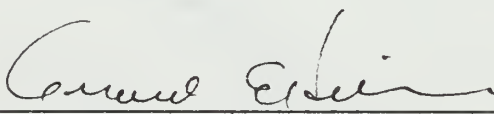
Four (4) of the six (6) areas, Soldier Pass/Piper Mountain, East Slope White Mountains, Last Chance Range and Cowhorn-Waucoba, respectively, have the highest potential for habitat enhancement of the six (6) areas.

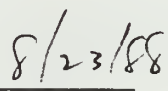
Bighorn sheep reintroductions are planned for the first two areas, for which BLM policy requires the preparation of a habitat management plan. The Last Chance Range has a bighorn population of about 100. An HMA plan for Cowhorn-Waucoba would complement the existing Inyo-White Mountains Deer Herd Management Plan.

As regards the proposed amendment, provided there is treatment of bighorn and upland game in the grazing AMPs, it is unlikely that an HMA plan for the Sylvania and North Coso Range would additionally enhance wildlife values. Further, energy development of the western side of the North Coso precludes many wildlife actions.

Implementation Needs

Prepare Four (4) Habitat Management Plans.


District Manager


Date

AMENDMENT SIX

CHANGE MULTIPLE USE CLASS DESIGNATION OF 2,164 Acres
ADJACENT TO RED ROCK CANYON

Proposed Amendment

Change the multiple use class designation of 2,164 acres of land adjacent to Red Rock Canyon State Park from unclassified to Class L.

Other Alternatives Considered

No Action.

Decision

Accept Proposed Amendment.

Rationale

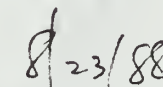
When the CDCA plan was adopted, the area was included within a Recreation and Public Purposes Act application. It has since been decided that the area will remain under BLM management. Since the adjacent area is designated Class L, it is consistent to designate this area as Class L. The area will continue to be managed by the BLM and the State Parks system under a memorandum of understanding.

Implementation Needs

None.



District Manager



Date

AMENDMENT SEVEN

CHANGE MULTIPLE USE CLASS OF TWO PARCELS IN HOMEWOOD CANYON

Proposed Amendment

Change the multiple use class of two parcels of land within Homewood Canyon from Class L to unclassified and delete the two parcels from the Great Falls Basin ACEC.

Other Alternatives Considered

No Action.

Decision

Reject Proposed Amendment.


Rationale

The Bureau cannot create private estates on public lands, especially when this would create inholdings in sensitive areas such as ACECs. Bureau policy is to acquire, rather than create, such inholdings. In the 1970s, the Bureau issued lifetime leases under the Mining Claim Occupancy Act (now expired) to two of the three residents inside the ACEC. The lessees will be allowed to occupy the land for the rest of their lives. The third resident will be offered a lease as well.

Implementation Needs





None.

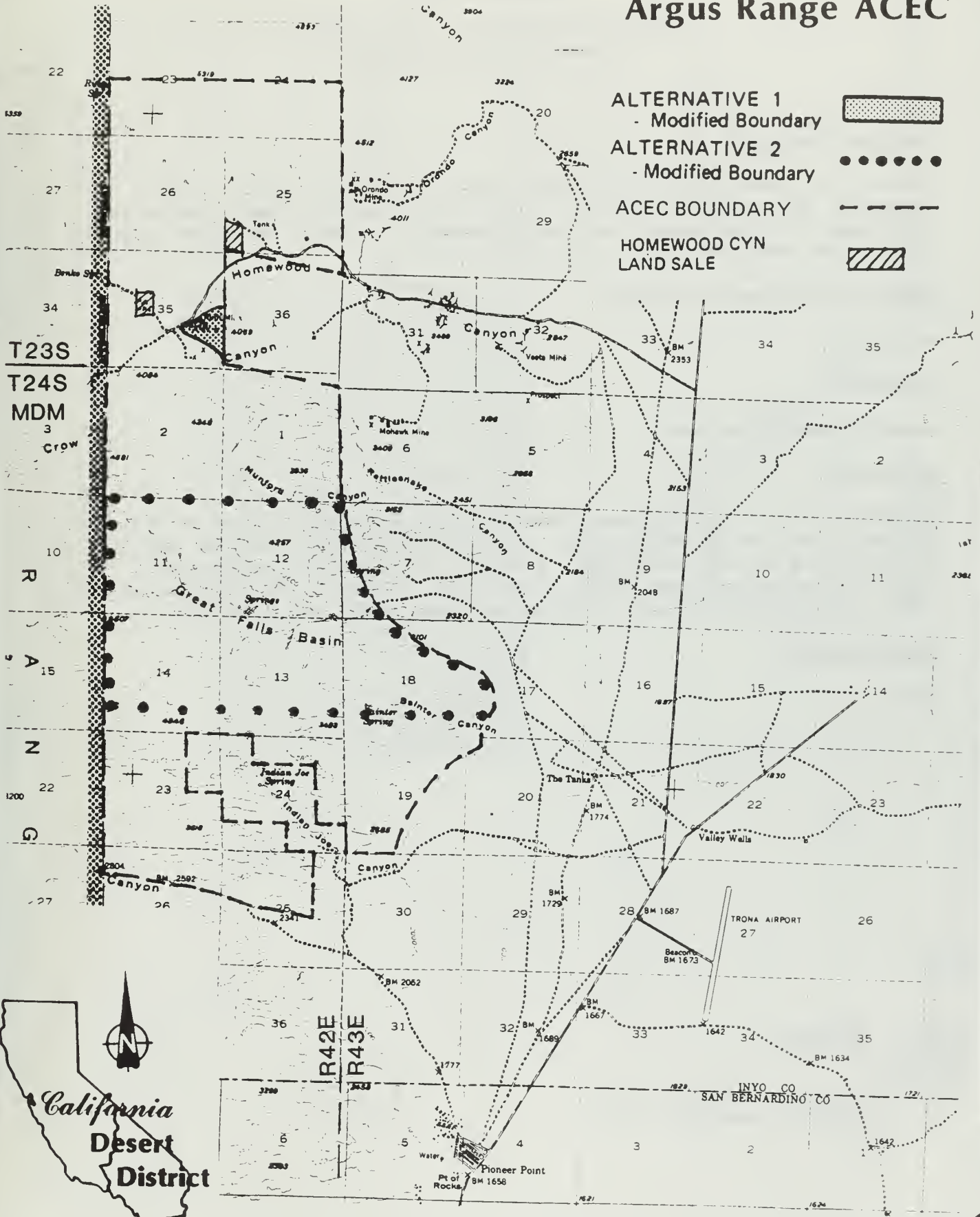

District Manager


Date

AMENDMENT 7

Great Falls Basin/ Argus Range ACEC

- ALTERNATIVE 1 - Modified Boundary 
- ALTERNATIVE 2 - Modified Boundary 
- ACEC BOUNDARY 
- HOMWOOD CYN LAND SALE 



AMENDMENT EIGHT

CHANGE MULTIPLE USE CLASS OF PARCEL
ADJACENT TO COACHELLA CANAL

Proposed Amendment

Change T12S, R16E, Section 6 from unclassified to Class L west of the Coachella (80 acres) and to Class I east of the Coachella Canal (800 acres). Redesignate vehicle access from "undesignated" to "limited to approved routes" west of the canal and "open" east of the canal.

Other Alternatives Considered

No Action.

Decision

Accept Proposed Amendment.

Rationale

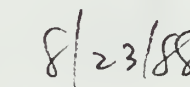
Recreationists using the Mammoth Wash open area use the part east of the Coachella Canal as a camping area. A Class I designation would be consistent with existing use and would enable possible development of recreational facilities proposed in the Imperial Sand Dunes Recreation Area Management Plan. Current unclassified status leaves these lands open to disposal.

Implementation

None.



District Manager



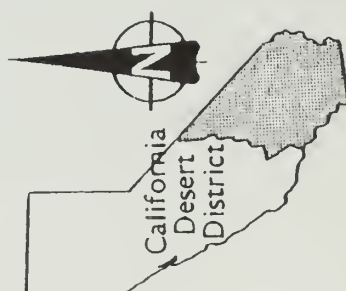
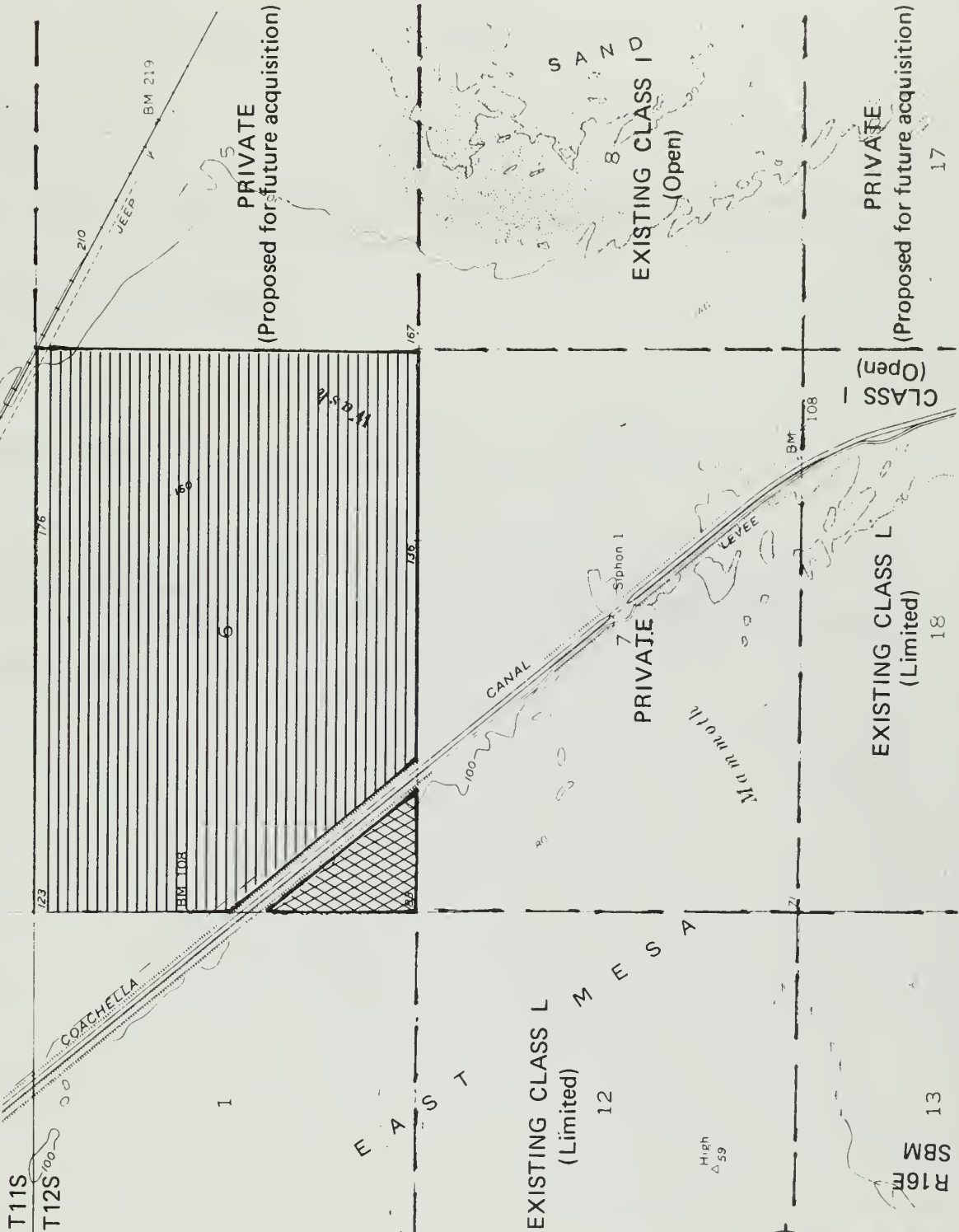
Date

AMENDMENT 8 Mammoth Wash

Sec. 6, T12S, R16E

CHANGE FROM 'U' (Unclassified)
TO CLASS I, OPEN
FOR VEHICULAR USE

CHANGE FROM CLASS 'U' (Unclassified)
TO CLASS L, LIMITED
To Approved Routes



AMENDMENT NINE

ADD NEW GOAL FOR RECREATION ELEMENT

Proposed Amendment

Add the following as a new goal for the recreation element: "Encourage the use and enjoyment of desert recreation opportunities by special populations, and provide facilities to meet the needs of those groups."

Other Alternatives Considered

No Action.

Decision

Accept Proposed Amendment.

Rationale


The new goal would complement BLM's current efforts to provide access for the handicapped to developed public facilities. It would also give public emphasis to the development of interpretive materials for special populations.

Implementation Needs

None.



District Manager



Date

AMENDMENT TEN

CHANGE PIUTE VALLEY ALLOTMENT FROM EPHEMERAL TO EPHEMERAL-PERENNIAL

Proposed Amendment

Change Piute Valley grazing allotment from ephemeral to ephemeral-perennial with a carrying capacity of 720 AUMs, all allocated to cattle.

Other Alternatives Considered

No Action.

Decision

Reject Proposed Amendment.

Rationale

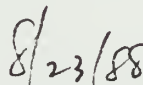
Most of the perennial forage is located in the western portion of the allotment, in the Piute Range. This area is within a recommended-suitable WSA and has a resident bighorn sheep herd. If the perennial forage were to be utilized, the rancher's operation would have to be shifted into the Piute Range, resulting in resource conflicts. If the operation continued to utilize Piute Valley (an area of primarily ephemeral forage), it would lack the perennial forage base necessary to justify the change to ephemeral-perennial.

Implementation Need

None.



District Manager




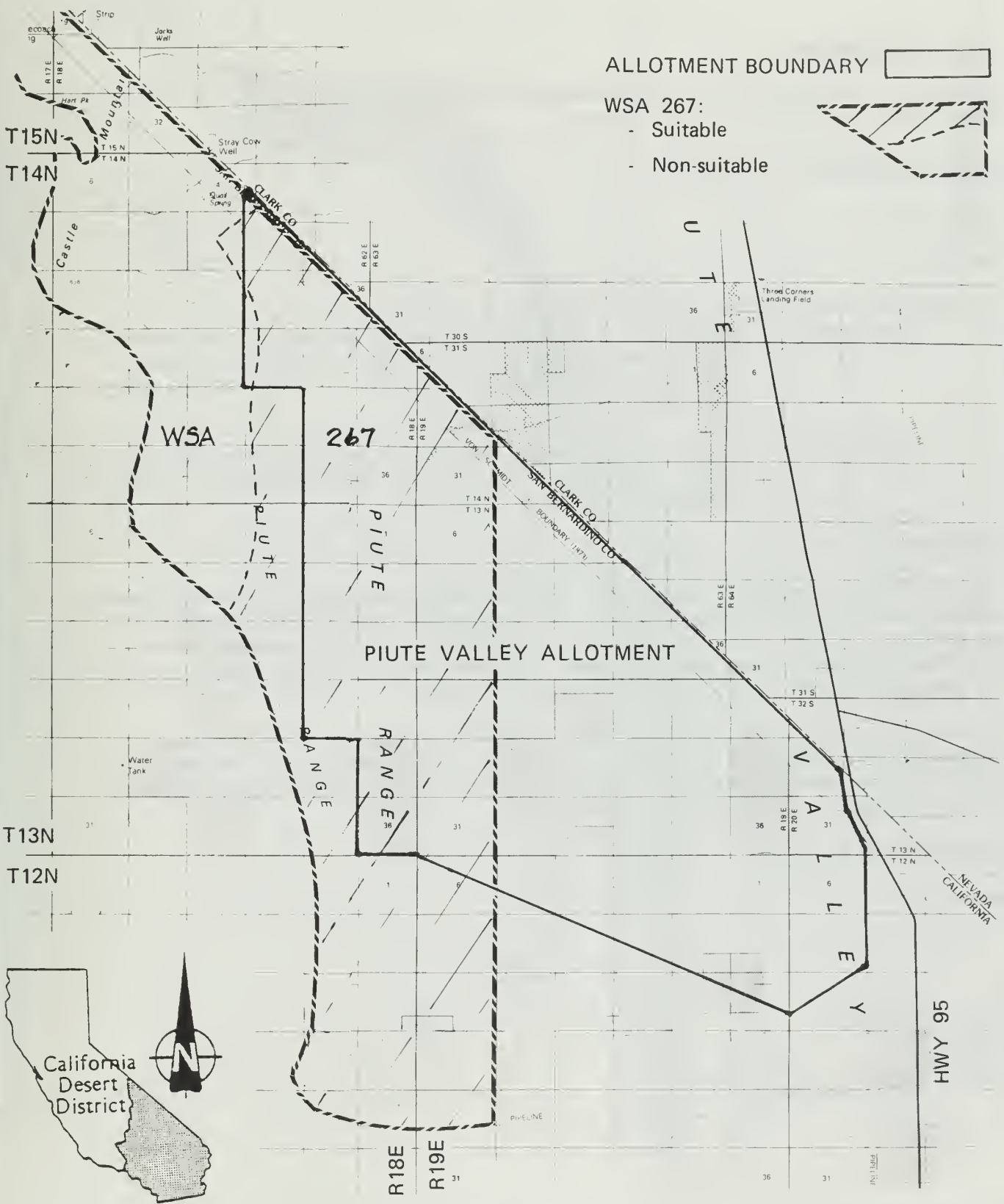
Date

AMENDMENT 10

Piute Valley Allotment

ALLOTMENT BOUNDARY 

WSA 267:
 - Suitable 
 - Non-suitable



T13N
T12N

T15N
T14N

HWY 95



AMENDMENT ELEVEN

ESTABLISH NEW UTILITY CORRIDOR
FROM INYOKERN TO VICINITY OF TRONA

Proposed Amendment

Establish a new utility corridor from corridor A at Inyokern to the Kerr-McGee facilities in the vicinity of Trona.

Other Alternatives Considered

No Action.

Decision

Accept Proposed Amendment subject to two conditions:

Condition 1.: Electrical transmission towers (as well as any other facilities) would be limited to 125 feet in height within the Naval Weapons Center's C and G low flight corridors.

Condition 2.: New facilities must meet all Visual Resource Management (VRM) class objectives within the VRM class III lands southwest of Trona.


Rationale

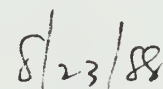
The Kerr-McGee Chemical Corporation (KMCC) intends to construct a replacement water line (16 inch diameter) from existing well fields in Indian Wells Valley to KMCC facilities in Searles Valley. In addition, a new brackish water pipeline (20 inch diameter) would be built from KMCC's Valley Wells facility to proposed Argus Cogeneration Expansion facility.

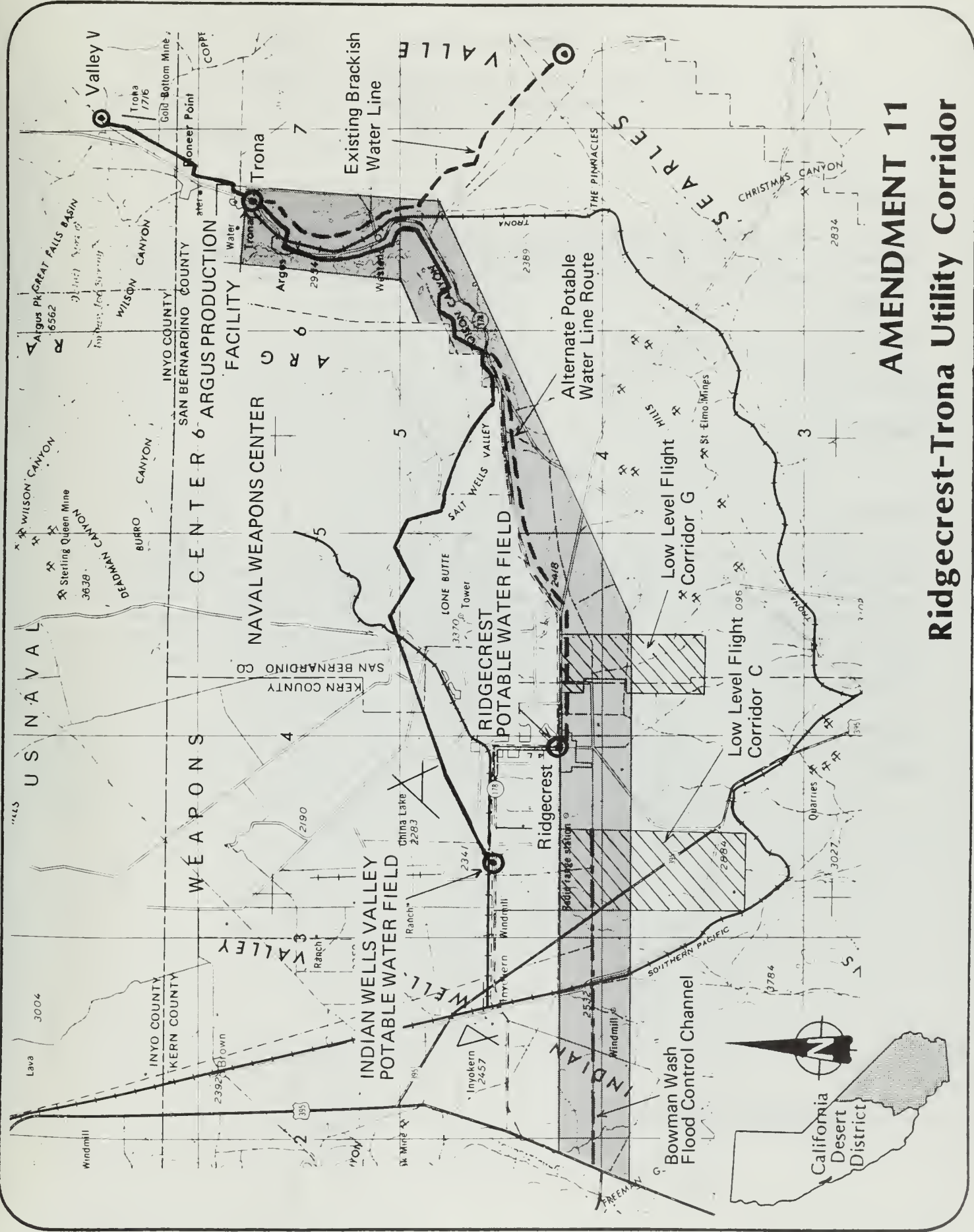
The City of Ridgecrest also plans to construct a pipeline from the Naval Weapons Center to KMCC in Trona. Finally, the Indian Wells Water Agency plans to construct pipelines to transport water from the Los Angeles Aqueduct to the Ridgecrest metropolitan area.

Implementation

None.

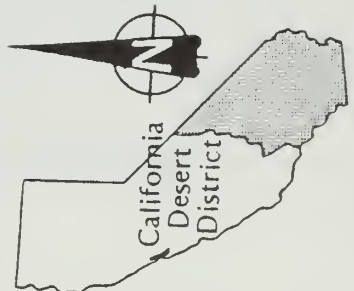

District Manager


Date



AMENDMENT 11

Ridgecrest-Trona Utility Corridor



AMENDMENT TWELVE

CHANGE VEHICLE ACCESS FROM LIMITED TO CLOSED
IN SAN SEBASTIAN MARSH

Proposed Amendment

Change Vehicle access designation from "limited to approved routes" to "closed" in a portion of the San Sebastian Marsh ACEC, as proposed in the recently completed ACEC plan. This action would include closure to vehicle camping.

Other Alternatives Considered

No Action.

Decision

Accept Proposed Amendment.

Rationale

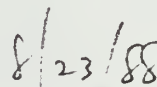
This change was recommended by the recently completed San Sebastian Marsh ACEC management plan for several reasons. Current vehicle access limitations are not effective in preventing vehicle impacts on sensitive habitats. Habitat for desert pupfish, flat-tailed horned lizard, Colorado Desert fringe-toed lizard, rare plants and possibly the San Felipe leopard frog would benefit from the closure. Important cultural resources would also be protected through the closure.

Implementation

None.








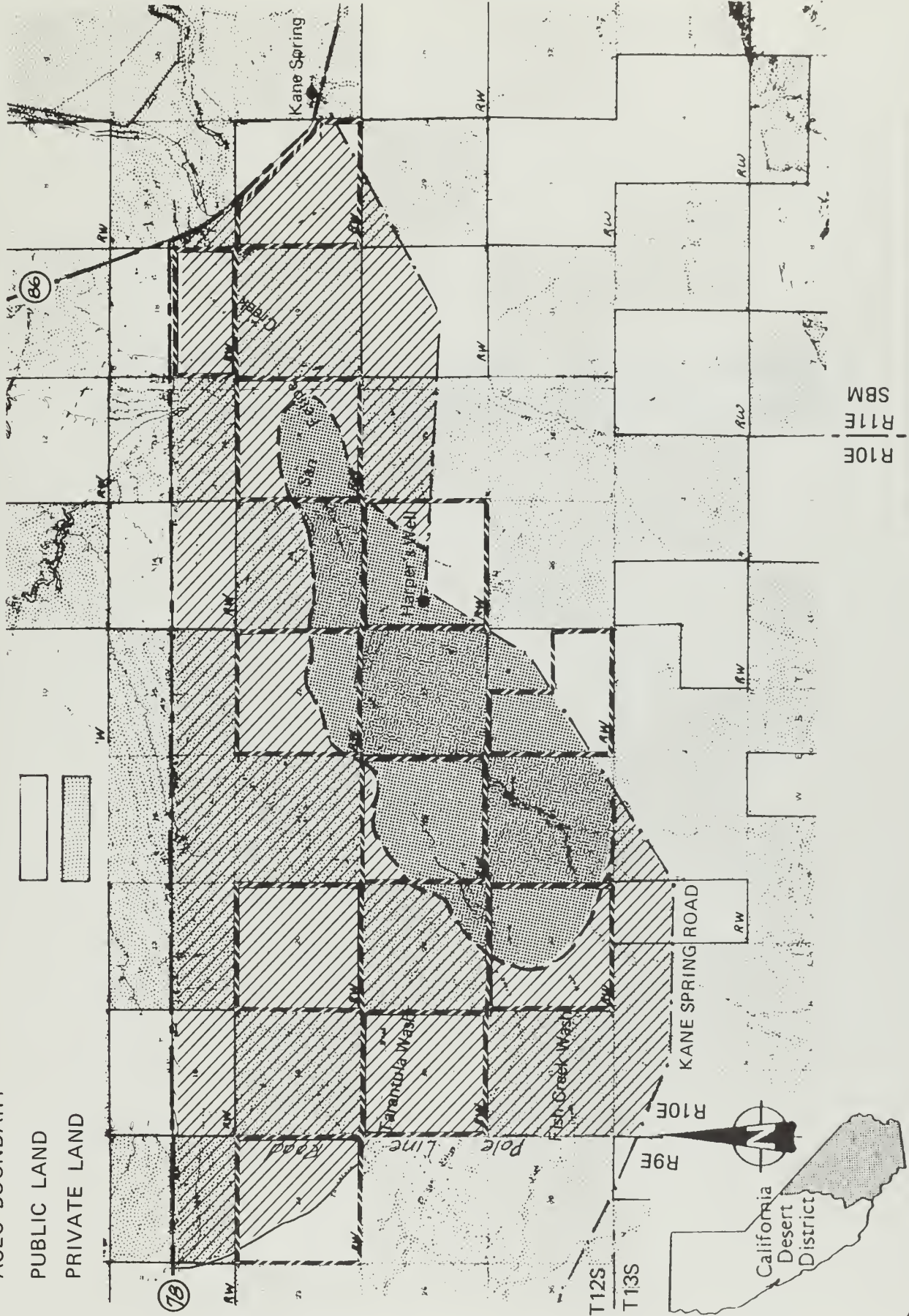
District Manager

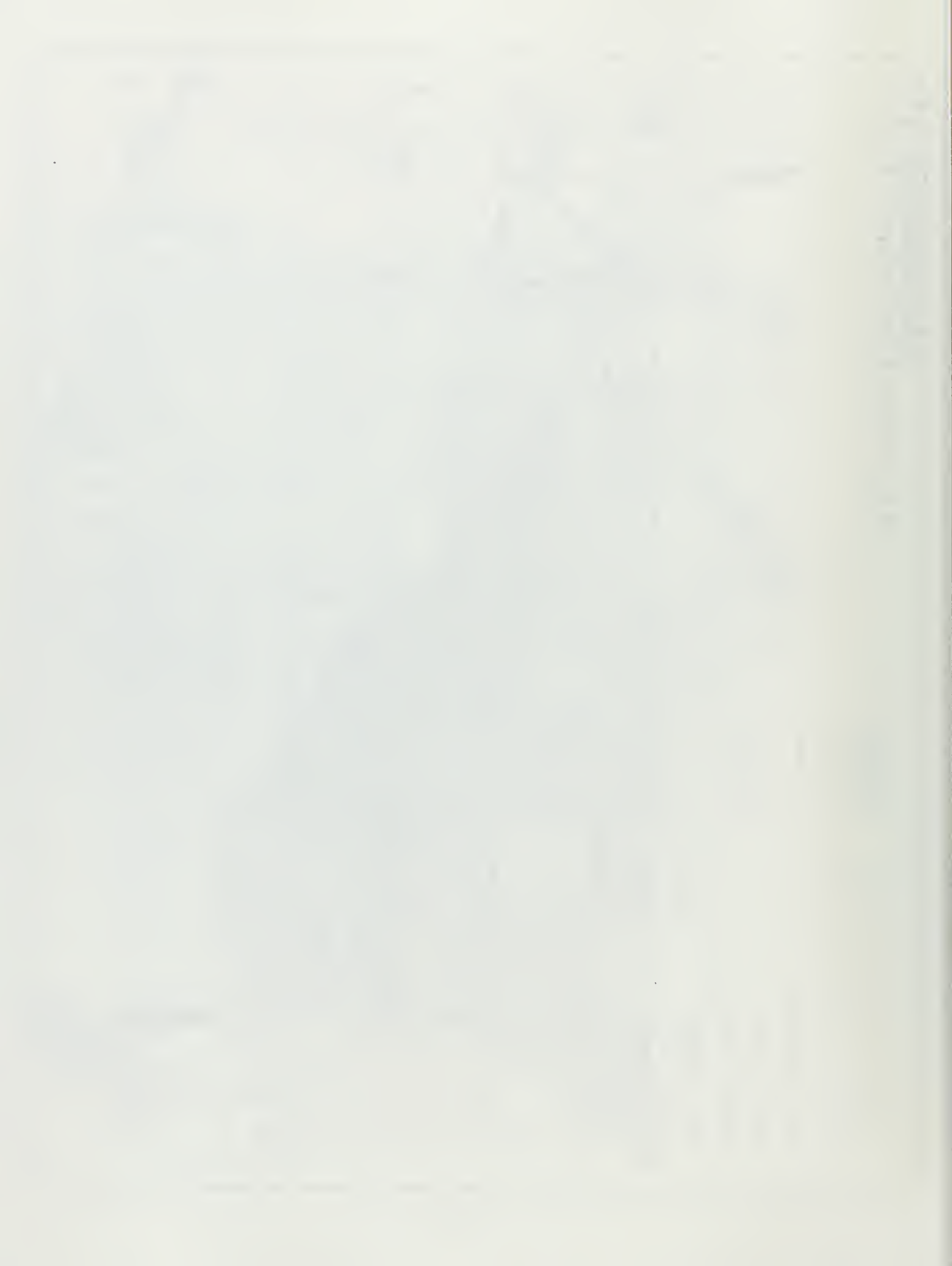


Date

AMENDMENT 12 San Sebastian Marsh ACEC

-  CURRENT VEHICULAR CLOSURE
-  EXPANDED VEHICULAR CLOSURE
-  ACEC BOUNDARY
-  PUBLIC LAND
-  PRIVATE LAND





COMMENTS *and* RESPONSES

WRITTEN COMMENTS AND RESPONSES

The BLM received a total of 39 letters addressing the proposed amendments during the public comment period. All letters received were reviewed. Those letters that had substantive comments (questions or issues that had a direct bearing on a proposed amendment) were given a response. Table 1 lists each comment letter in order of receipt and identifies its reference number. Within a comment letter substantive remarks are identified. The responses which accompany each letter are keyed to the appropriate comment by the reference number that appears on the comment letter.

All comment letters have been reprinted verbatim and substantive comments addressed. Letters that did not address substantive issues but presented an opinion are acknowledge by their inclusion. In one instance, a comment letter was acknowledged by a letter and this response was placed in Appendix A.

Table 1

COMMENT LETTERS

Letter Number	Source of Letter
1	Mary Ann Henry
2	Arthur Unger, Kern-Kaweah Chapter, Sierra Club
3	Peter Burk, Citizens for Mojave National Park
4	John D. Wehausen, Ph.D.
5	Jay B Wilson, California Wool Growers Association
6	Thomas J. McGill, Naval Weapons Center
7	Kenneth H. Taylor
7A	Kenneth H. Taylor
8	Captain M.R. Boston, Naval Air Facility, El Centro
9	Randall L. Abbott, Planning & Development Services, Bakersfield
10	Pamela MacKay
11	Ted Rado
12	D'Arcy P. Bannister, Bureau of Mines
13	Mary Ann Henry
13A	Mary Ann Henry
14	Richard C. Schwabe
15	Richard W. May, Desert Research International
16	Fred L. Austin, Crown Mining Corporation
17	Mr. & Mrs. Robert Meade
18	Judith L. Hollins
19	Charmaine Parkes
20	George E. Moncsko, Desert Tortoise Preserve Committee, Inc.

21 Peter Hillier, M.D.
22 Michael Hillier
23 Joe Evans
24 David R. Hembree, Queenstake Resources (USA) Inc.
25 John R. Swanson
26 Betty Forgey
27 Glenn R. Stewart, Ph.D., The Desert Tortoise Council
28 Betty H. Matyas
29 C. Panlaqui
30 J.W. Teeter, United States Fish and Wildlife Service
31 Ron Schiller, High Desert Multiple-Use Coalition
32 Patricia Schifferle, The Wilderness Society
33 James R. Geary, High Desert District
34 Donald Falk, Desert Survivors
35 Richard Spotts, Defenders of Wildlife
36 Kathryn Gualtieri, Office Historic Preservation, California
37 Robert D. Johnstone, Edwards Air Force Base
38 Gordon F. Snow, The Resources Agency of California
38A Pete Bontadelli, California Dept of Fish and Game

329 Perdew
Ridgecrest, CA 93555
October 12, 1987

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

1

Dear Sir:

I received the "Proposed 1987 Plan Amendments"-EA document Oct 10.

Thank you for accepting the Short Canyon ACEC proposal I applied for on March 12, 1987. (pg. 3-1)

The language of my application was freely quoted in the document. (S-1, 2-3).

My application listed four enclosures including, "A Check List of Plants of Short Canyon, 1970-1983 by Mary Ann Henry; and "Additions to the Checklist, 1984-1986", by Mary Ann Henry. This inventory-checklist has been published and distributed to interested people.

It appears there could be a grave error on page 3-4 of the BLM document.:

"an inventory of the canyon conducted by the California Native Plant Society identified 292 species from 55 plant families".

1-1 The statistics quoted were on my application and in my Checklist. It is "strange" the CNPS came up with identical numbers of species as I did. CNPS has never been associated with my work in Short Canyon.

If the BLM preparer took my list and credited the CNPS, it could have legal implication and is an ethical one. If this act was committed, it tarnishes BLM image.

The BLM preparer used the CNPS name for an inventory in the document. Did the preparer obtain permission from CNPS to do so? What was the date of the permission? Who gave it? Who did the field work to come up with exactly 292 species in 55 plant families? Has the List been published under CNPS' name? May I please have a copy of the CNPS plant inventory of Short Canyon which credits CNPS?

If an error has truly been made in the "Proposed 1987 Plan Amendments" document, would you please take steps publicly to correct the error-NOW.

Thank you,

Sincerely,

Mary Ann Henry

Mary Ann Henry

34

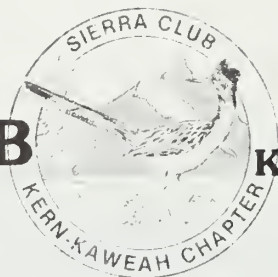
cc. Mary DeDecker, Bristlecone Chapter, California Native Plant Society

Response to Mary Ann Henry

Response 1-1

Thank you for the correction. BLM recognizes that Mary Ann Henry and not CNPS was responsible for providing the inventory and the 292 identified species data for the Short Canyon ACEC proposal.

SIERRA CLUB



KERN-KAWEAH CHAPTER

2

P.O. Box 3357
Bakersfield, CA 93385
October 19, 1987

California Desert District
BLM
1695 Spruce Street
Riverside, CA

Dear Sirs:

We are writing in support of Amendment Number 2, Area of Critical Environmental Concern. We would like to have the entire drainage of Short Canyon, Kern County, designated as an ACEC.

Short Canyon is north of Indian Wells Canyon and east of Brady's on the east side of the southern Sierra Nevada. There are many resources in this canyon:

1. Botanical - 292 plant species in 55 plant families (Mary Ann Henry of Ridgecrest, CA has published a study done over a 12 year time period)
2. Riparian area - there is an all year stream and several springs
3. This area is ideal for non-consumptive recreation and non-vehicular recreation
4. Wildlife is plentiful, such as songbirds, upland game birds, amphibians, and mammals, including mule deer.
5. This is a peaceful and quiet canyon unlike others with ORV useage

Intensive cattle grazing is having a deleterious effect on the plants and on the riparian areas. Designation as an ACEC will protect this valuable canyon for future generations.

Thank you,

Arthur Unger
Conservation Chair

CITIZENS FOR MOJAVE NATIONAL PARK

P. O. BOX 106 BARSTOW, CA. 92311

California Desert District
Bureau of Land Mangement
Attn: Plan Amendment
1695 Spruce St
Riverside, California 92507

3

Dear Gerry Hillier;

28 October 1987

Again, we are disappointed in the plan amendment process. There is nothing in the plan amendments to improve BLM management of the East Mojave National Scenic Area (EMNSA). The Desert Plan continues to decline.

The one plan amendment that would have improved EMNSA management (eliminating grazing in FMNSA west of Kelbaker Road) was rejected.

We recommend rejecting plan amendment #10. The Piute Valley Allotment should be reduced to exclude all grazing inside EMNSA. The damage that welfare grazing does should not be allowed at all in EMNSA. The Fort Piute Wilderness (WSA 271) should not have any grazing in it and the waters from Piute Creek, one of the few perennial desert streams should not be used for welfare grazing. Joe Fvans has been receiving BLM welfare for 12 years and that is too much. We taxpayers are tired of paying welfare to Joe Evans and his kind. 98% of our nation's beef comes from private land. It should be 100%.

Because of bighorn sheep and tortoise habitat, all grazing should be eliminated in EMNSA. The Piute Valley allotment portion that is in EMNSA should be terminated when the lease expires in 1989.

Sincerely,

Peter Burk
Peter Burk
President



*Hillier
Needles*

RECEIVED
BUREAU OF LAND MANAGEMENT

1987 OCT 29 PM 2: 53

CALIFORNIA DISTRICT
RIVERSIDE, CA.

1417 Bear Creek
Bishop, CA 93514

26 October 1987

Routing	Date	Intls.
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Gerald E. Hillier, District Manager
California Desert District
Bureau of Land Management
1695 Spruce St.
Riverside, CA 92507

Dear Mr. Hillier:

I am writing to comment on your decision not to accept Amendment 87-P-17 to the California Desert Plan. This amendment would have experimentally eliminated livestock grazing from the Old Woman Mountains for at least five years. My purpose here is to explain (1) the importance of that proposed amendment, and (2) why your reason for deferring that amendment ("studies are still underway") is inappropriate. 4

4-1 (1) Cattle diseases are now well documented in the native sheep in the Old Woman Mountains. Between 1984 and 1986, 16 blood samples were collected. Of these, 19% showed recent exposure to parainfluenza-3 (PI-3), 38% to bluetongue (BT), and 88% to epizootic hemorrhagic disease (EHD). An additional 5 samples were obtained this year, for which data are not yet available. Clearly, the sheep have a high exposure to cattle diseases. There is no need for further study to document this.

(2) These diseases are well documented elsewhere to be associated with clinical disease states in juvenile mountain sheep leading to higher than expected mortality (e.g. the Santa Rosa Mountains). Such mortality was well documented in the Old Woman Mountains (see the report I authored with M. C. Hansen last year, of which your office received a copy).

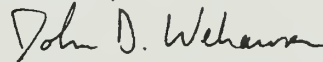
4-2 (3) The Old Woman Mountains exhibit a low population density, especially for such a resource rich range. This density is approximately one-third that of the neighboring Marble Mountains -- a resource poor range in comparison. Ongoing research along these lines will only further document this comparatively low density in the Old Woman Mountains. It is no reason to put off a decision on Amendment 87-P-17.

4-3 (4) All existing information points to the highly probable hypothesis that cattle are the overwinter reservoirs for BT and EHD. Since there is no reliable way to vaccinate cattle against these diseases, the only way to adequately understand their role as disease reservoirs is to remove them entirely from the range for a number of years and continue obtaining blood samples from the sheep, while monitoring their demography. This concept is well spelled out in the enclosed reprint of an article I published on the Santa Rosa Mountains with others this year, and is exactly what Amendment 87-P-17 proposes.

(5) The current cattle grazing in the Old Woman Mountains occurred as the result of 1981 Amendment 81-21 to the California Desert Plan, which originally proposed no grazing south of I-40. That Amendment included the following stipulation: "At the end of five years (1987), there will be a full reanalysis of the bighorn populations and range conditions. If grazing is shown to negatively

impact bighorn sheep population, elimination or reduction of cattle range will be considered." Current information suggests that the impacts of cattle in the Old Woman Mountains on the bighorn are substantial through the disease organisms they carry. By the above stipulation in Ammendment 81-21, the logical result would be the elimination of cattle grazing this year. Ammendment 87-P-17, proposed by the Department of Fish and Game, takes a more conservative approach. It suggests removing cattle for only as long as it will take to evaluate the impacts they have been having of the sheep. Perhaps we will find no change; but without doing such an experiment, you will be forever making management decisions relative to this question on the basis of inadequate information. I urge that you seriously reconsider the decision on Ammendment 87-P-17, that you can better understand the impacts of BLM's grazing program in the desert. To defer this decision on the grounds that studies are underway is to simply avoid this important issue. I look forward to your response on this question.

Sincerely,



John D. Wehausen, Ph.D.
Research Associate
University of California
White Mountain Research Station

Response to John D. Wehausen, Ph.D.

Response to 4-1, 2, 3

. See letter from District Manager, Appendix A.

CALIFORNIA WOOL GROWERS ASSOCIATION

RECEIVED
1987 NOV 12 PM 1:06
CALIFORNIA DESERT DISTRICT
RIVERSIDE, CALIF.

5

November 6, 1987

Gerald E. Hillier
District Manager
California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, CA 95207

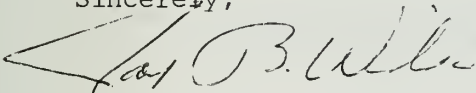
Dear Mr. Hillier:

The California Wool Growers Association, which represents the sheep producers throughout the state of California, would like to comment on the proposed 1987 plan amendments to the California Desert Plan.

The Wool Growers have been supportive of the multiple use management of public lands. Your report has carefully taken into consideration all concerned parties. We would like to continue to support multiple use planning and support the amendment changes which have been proposed.

Keep up the good work.

Sincerely,



Jay B. Wilson
Executive Vice President

lks

cc: Frank Munoz

John Errea, *President*
Lancaster, California

Don Torell
Ukiah, California 41

Michele C. Howard, *Executive Vice President*
Sacramento, California



3382 EL CAMINO AVENUE, SUITE 6 SACRAMENTO, CALIFORNIA 95821
California Ram Sale • Sheepman's Bi-Weekly
(916) 482-9680



DEPARTMENT OF THE NAVY
NAVAL WEAPONS CENTER
CHINA LAKE CALIFORNIA 93555 6001

BUREAU OF

IN REPLY REFER TO
4100
Ser 2662/13972
9 Nov 87

1987 NOV 12 PM 1:11

SAN DIEGO DISTRICT
OFFICE

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

6

Dear Mr. Hillier:

The Naval Weapons Center (NAVWPNCEN) would like to take this opportunity to comment on the Environmental Assessment for the Proposed 1987 Amendments to the California Desert Conservation Area Plan.

Our concerns pertain to Amendment 11, which would establish a new utility corridor from Corridor A at Inyokern to Kerr McGee facilities near Trona.

The Environmental Consequences (Chapter 4) section of the Environmental Assessment discusses the potential for the installation of high voltage powerlines within the new corridor. These structures would traverse the B Range, C Range and G Range low flight corridors used by NAVWPNCEN.

6-1

The Center is concerned that above ground structures such as powerlines may preclude the use of these test ranges for certain types of testing activities. The types of tests conducted on these ranges cannot be duplicated at any other military facility. The mission of the NAVWPNCEN could be severely impacted by the loss of these ranges.

If you have any questions or need additional information the point of contact is Mr. Tom Campbell. He can be reached by telephone a (619) 939-3411, extension 550.

Sincerely,

THOMAS J. MCGILL
Head, Environmental Division
Public Works Department
By direction of the Commander

Rout- ing	Date	Intls.
TO:		
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ADM		
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CA		
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Action By:		
Return To:		

Response to Naval Weapons Center, Department of Navy

Response 6-1

Mitigation Measure 11-1 (page 4-18, EA) recommends limiting electrical transmission towers and any other facilities to 125 feet in height within the Naval Weapons Center's C and G Low Flight corridors. This measure will become a condition of approval of any above-ground structures that are authorized within the C and G corridors.

November 5, 1987

California Desert District
Bureau of Land Management
Attn: Plan Amendments

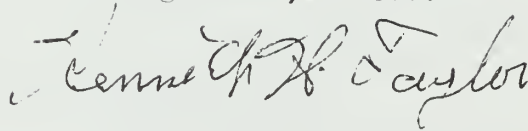
7

I just finished reading my copy 1987 Plan Amendments and would like to make a few comments in general. First, you seemed to have done a bureaucratic over kill on the Home God Canyon affair. I shudder to think of the federal funds spent for the Frank Towhee, which as I see it is the Snail Darter all over again. A survey of the protected springs on the adjacent level weapons could have been done first. Like the Snail Darter showing up in many other areas, the Brown towhee could also, but who knows?

My second comment is about rabid Sierra Club environmentalist Mary Ann Henry getting her own private ACEC in Short Canyon. She writes letters to the editor frequently complaining about cow droppings, empty shotgun shells and bones, beer and soft drink cans, picnic litter, etc. If this ACEC is really justified, there should be more sponsors. She also hates motorcyclists and off roaders.

Sincerely

Kenneth H. Taylor
216 .Robertson Rd.
Ridgecrest, CA 93555



RECEIVED
BUREAU OF LAND MANAGEMENT
1987 NOV 12 PM 1:17
CALIFORNIA DESERT DISTRICT
RIDGECREST, CA.

November 25, 1987

RECEIVED

BUREAU OF LAND MANAGEMENT
NOV 27 PM 2:11
CALIFORNIA DISTRICT
RIVERSIDE, CA

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

7A

I have already submitted one comment on my letter dated November 5, but since then I have come into additional information that prompts this letter. My original letter was concerning the Short Canyon ACEC as being the private preserve of Mary Ann Henry, one of our local and highly verbal Sierra Club members. Recently I found out that the manager of the BLM Ridgecrest office, Patricia Maclean is also a Sierra Club member.

I would think that this would pose a definite "conflict of interest" for Ms. Maclean. The Sierra Club has almost a perfect record of opposing all mining, cattle grazing, timbering and development. They were recently successful in closing down one of our local places the employment, they lumber mill north of Inyokern at Pearsonville. All the above runs contrary to the concept of "multiple land use" as advocated by the BLM. How can Ms. Maclean advocate the stand taken by her employer and her club at the same time? I think the same should hold true for any government employee entrusted to manage public lands which would include forestry officials. Perhaps even Senator Cranston is a member and is advocating changing the 1976 law he is sworn to uphold.

Sincerely

Kenneth H. Taylor

Kenneth H. Taylor
216 W. Robertson Rd.
Ridgecrest, CA 93555



DEPARTMENT OF THE NAVY
NAVAL AIR FACILITY
EL CENTRO, CALIFORNIA 92243

IN REPLY REFER TO:

5090

Ser 32/1283

NOV 13 1987

8

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

Subj: PROPOSED 1987 AMENDMENTS TO THE CALIFORNIA DESERT CONSERVATION AREA PLAN

Gentlemen:

We have examined amendments one, four, eight, and twelve with respect to their impact on Navy operations. Maximum usage consistent with public safety was the criterion used.

The preferred amendment, in each case, is acceptable to the Navy.

Thank you for the opportunity to comment on these plan amendments. Point of contact at NAF El Centro is Mr. Roger Hillhouse at (619) 339-2201.

Sincerely,

M. R. BOSTON
Captain, U. S. Navy
Commanding Officer

RECEIVED
NOV 16 11 12 23
DIST

DEPARTMENT OF PLANNING AND DEVELOPMENT SERVICES

RANDALL L. ABBOTT
DIRECTOR

STEVEN G. LADD
Assistant Director

Mailing: 1415 Truxtun Avenue
Bakersfield, CA 93301
Location: 1356 Norris Road
Bakersfield, CA 93308

(805) 861-2615
FILE: Agency
US Govt-BLM

November 10, 1987

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

9

Re: Environmental Review: Proposed 1987 Plan Amendments to California Desert Plan

Ladies and Gentlemen:

Thank you for the opportunity to review the above-noted project. We note that the second proposed amendment will designate the entire drainage of Short Canyon, Kern County, as an ACEC (Area of Critical Environmental Concern). This would not appear to affect vegetation, wildlife, or grazing because of Walker Pass AMP. The amendment would have little or no effect on geologic, energy, or minerals characteristic of the area. Recreation will be enhanced.

Amendment 6 will change 2,164 acres of unclassified land adjacent to Red Rock Canyon State Park to Class L (Limited Use Area). Designation of this land as Class L would provide management of sensitive cultural resources that are consistent with that afforded resources in the surrounding area. This amendment would also provide for recreation management needs and require a plan of operation for any surface disturbance which would result from mineral development. This would not appear to be a significant impact on the development of saleable or locatable mineral resources.

Neither the Red Rock Canyon "L" Class Amendment or the Short Canyon ACEC appear to have any effects on private land in the area. We have no further comments at this time.

Very truly yours,

RANDALL L. ABBOTT, Director
Planning and Development Services

By *Frank Chmiel*
Frank Chmiel
Junior Planner

pss

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BUREAU OF LAND MANAGEMENT
1987 NOV 16 PM 12:29
CALIFORNIA DESERT DISTRICT
RIVERSIDE, CA

Response to Pamela MacKay

Response 10-1

Curent plans for protection of the area within the proposed ACEC are underway. Livestock will not have access to the aquatic and riparian habitats in the Short Canyon basin or watershed. This will be accomplished through livestock fencing which will restrict cattle movements within the ACEC. The fence is almost complete and has been designed to allow for wildlife movements, including mule deer movements both over and under the barbed wire strands. Steep terrain, not negotiable by cattle, has been left unfenced, and this will further allow for deer and other wildlife movements into and out of the ACEC. The purpose of the proposed pipeline is to provide a livestock water trough(s) east of the ACEC and livestock fence. Water for these facilities will originate from the old concrete dam immediately above the small waterfall within the ACEC.

2430 Fair Oaks Blvd., Apt. 179
Sacramento, California 95825
November 9, 1987

1987 NOV 19 PM 1:33

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BUREAU OF LAND MANAGEMENT
RIVERSIDE, CALIF.

DALLIN, CALIFORNIA DISTRICT
59 RIVERSIDE, CA.

11

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

Dear Mr. Hillier:

Thank you for the opportunity to provide comments on the 1987 Desert Plan amendments. My specific comments for each amendment follow.

- (1) I strongly support the Bureau's decision to designate an additional Area of Critical Environmental Concern in the West Mesa. A recent status report on the flat-tailed horned lizard underscores the importance of establishing reserves for this species. Bureau-initiated studies also indicate that extant populations are declining in other areas, necessitating increased protection of remaining areas where the species is comparatively abundant.
- (2) I support acceptance of this amendment. Livestock grazing, particularly when concentrated in canyon bottoms and riparian corridors, can result in heavy damage to vegetation. A carefully developed management plan for the area also warrants high priority.
- (3) I urge modification of the proposed ACEC boundary expansion to include all areas within designated critical habitat of the Inyo brown towhee (exclusive of those within the China Lake Naval Weapons Center). The limited geographic range and low population numbers of this species warrant a high level of protective management.
- (4) I have no comment on this amendment.
- (5) I recommend acceptance of Alternative A. The rationale for proposing Alternative B in the text on page 2-4 of the draft environmental assessment suggests that current grazing and mining operations preclude the opportunity for meaningful management of wildlife resources in this area, when this is not the case. Grazing allotment management plans, as with all other plans developed for specific resource management in the CDCA, can be revised based on additional information. I would expect that AUM allocations, for example, could be adjusted to ensure adequate forage for desert bighorn sheep in the North Coso Range, if any Habitat Management Plan developed calls for establishment and maintenance of a certain number of animals here.

(6) I recommend acceptance of this amendment. I've visited the Redrock Canyon area regularly since 1964, and strongly

believe that it is in the best public interest to retain Federal ownership and management of these lands because of their scenic and recreational values. The subject Bureau-administered lands could also have paleontological values as well.

- (7) I recommend rejection of this amendment. In spite of the intentions of the proponents, retention under Federal management is necessary given area resource sensitivity.
- (8) I have no comment on this amendment.
- (9) I have no comment on this amendment.
- (10) I strongly urge rejection of this amendment. It seems obvious that major conflicts will result between livestock grazing and wildlife and vegetation resource protection if livestock perennial forage utilization is authorized. The amount of resource damage would also far surpass any benefits to the public derived by increasing the livestock production level over this allotment area. Any related livestock "improvements", such as pens, fences, etc., may also conflict with wilderness area protection, should the Fort Piute Wilderness Study Area receive such status by Congress.
- (11) I have no comment on this amendment.
- (12) I strongly urge support of this amendment. Expansion of an existing vehicle closure zone is necessary if the present level is insufficient to ensure appropriate levels of protection of the federally-listed desert pupfish, candidate-for-listing San Sebastian leopard frog and flat-tailed horned lizard, and other sensitive resources.

Rejected Amendment 87-P-2.

I believe that, given the importance of the Fremont Valley towards long-term perpetuation of the desert tortoise, and the inability of the Bureau to effectively enforce vehicle route designations over the area (resulting in widespread deterioration of habitat), this proposed amendment clearly should have been accepted. I've witnessed this widespread environmental degradation first-hand over the preceeding 23 years, particularly in the last 15 years, with obvious declines in desert tortoise abundance. From a management standpoint, given the extreme fragility of the area and speculative nature of instituting effective habitat restoration from off-road vehicle-induced impacts to Mojave Desert soils and vegetation, it seems obvious that increasingly stringent protection is required. Deterring the issue pending development of an ACEC management plan allows for continued environmental degradation. A more effective means of ensuring resource protection would be to increase the size of the existing ACEC to include all sensitive areas, and then adjust the ACEC boundary after development of a carefully developed and detailed management plan. This strategy would also expedite the timing for ACEC management plan completion. The subject plan is already several years behind schedule, with no guarantee that

11-1

plan completion will meet the "amended" schedule for completion by no later than October 1988. Needless to say, this is the second consecutive year that the Bureau has deferred any decision in this matter.

Rejected Amendment 87-P-15

11-2 [The prior Desert Plan amendment to allow expansion from a 100- to a 300-foot-wide camping zone along vehicular routes in the CDCA may result in the avoidable loss of many desert tortoises and associated degradation of habitat. The proposed amendment would selectively restrict this camping width in areas of high desert tortoise population density. Using the route designation process to defer any decision blatantly ignores the fact that this process has already been completed for a large portion of the California Desert without any restrictions on camping zones for tortoise protection. Given the fact that no reasonable alternative courses of action are viable, the amendment should have been accepted by the Bureau.

Please provide me with a copy of your final environmental assessment. I would also like to be retained on your mailing list for other documents subject to public review and comment. Incidentally, I've heard that the next draft Afton Canyon ACEC Management Plan will be available for public comment shortly, and request a copy of this for review when available.

Sincerely,



Ted Rado
Wildlife Biologist

bcc

Respond to Ted Rado

Response 11-1

The BLM agrees that increased protection of tortoise habitat in Fremont Valley and the Rand Mountains is necessary to halt and reverse the significant declines in both habitat quality and the desert tortoise population.

The California Desert District formed a team of qualified individuals who regularly met over a 12 month period for the purpose of developing a series of recommendations for managing desert tortoises and their habitat. The team's recommendations are being reviewed and will be finalized soon. Also, the Ridgecrest Resource Area office is beginning the process for development of a comprehensive land use and habitat management plan for the entire Fremont Valley and Rand Mountains. The purpose of this plan will be to identify what actions are needed to maintain viable populations of desert tortoises as well as developing actions needed for managing multiple land uses. The final plan for this area is expected to be completed in October of 1989. Extensive public involvement and public review of a draft plan is also planned.

The BLM with the cooperation of District 37 of the American Motorcycle Association has restricted competitive off-road vehicle racing in Fremont Valley and the Rand Mountains. Until a final management plan is developed, there will be no race starts, pitting or finishes in the area, and no races will be allowed from March 1 to June 30. The only races allowed will be on approved routes and outside the closure dates. We believe that full public involvement will provide for development of a more appropriate management plan for the area and a more successful implementation of the actions that are approved in the final.

Response 11-2

The concept of restricting vehicle use and camping within crucial desert tortoise habitat is being discussed in the District Tortoise Work Group. A comprehensive plan for managing desert tortoise habitat is being finalized and will address necessary actions related to the potential for increased impact to desert tortoises within the 300 foot camping/vehicle parking zone adjacent to open vehicle routes.



United States Department of the Interior

BUREAU OF MINES

WESTERN FIELD OPERATIONS CENTER
EAST 360 3RD AVENUE
SPOKANE, WASHINGTON 99202

November 18, 1987

12

Memorandum

To: California Desert District, Bureau of Land Management, Riverside, California
ATTN: Plan Amendments

From: Supervisor, Mineral Issues Involvement Section, Branch of Engineering and Economic Analysis

Subject: Environmental Assessment of the Proposed 1987 Plan Amendments to the California Desert Plan

Our comments on the subject amendments are directed towards the proposed designation of Areas of Critical Environmental Concern (ACEC) for wildlife, botanical, and cultural resource values in the West Mesa area of Imperial County, and the designation of the entire drainage of Short Canyon, Kern County.

12-1 ACEC status may allow multiple use, but mineral exploration or development would likely be subject to severe restrictions not found on open lands. On page 4-2, the proposed 1987 plan incorrectly states that creating the ACEC "would have no effect since the ACEC designation does not, in and of itself, withdraw the lands involved from operation of the mineral leasing, location and saleable laws." However, on page 4-3 it is stated, "Any added layer of protection may make the development of mining claims in existence prior to 1976 (if any exist) more difficult if conflicts arise with the resource value the ACEC is designed to protect." Also, comments on page 4-5 note how an ACEC "may conflict with mining activities" and may pose "some constraints" on how mining development may proceed. These are more correct, and the statement on page 4-2 should be changed.

We suggest that more consideration be given to the possible effects (either beneficial or adverse) to the mineral natural resource utilization prior to designating ACECs. Thank you for the opportunity to comment.

D'Arcy P. Banister
D'Arcy P. Banister

Response to Western Field Operations Center, Bureau of Mines

Response 12-1

The statement on 4-2 is true insofar as the withdrawal issue is concerned. However, it is also true that there is the potential for an effect on mineral development by requiring through the ACEC plan more protection measures. The level of protection established may cause an operation to be unnecessary or undue, because this threshold is to be maintained in the ACEC.

329 Perdew
Ridgecrest, CA 93555
Nov. 22, 1987

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

13

Dear Plan Amendments:

Thank you for accepting alternative A for the proposed Plan Amendment #2, to designate the entire drainage, including the falls of Short Canyon, Kern County as an Area of Critical Environmental Concern.

I wish to support the Short Canyon ACEC Plan Amendment # 2.

13-1

The ACEC was proposed as a botanical resource. On page S-4 the document proposes the canyon to be used for "recreation". But what is "recreation"? In BLM parlance for many years this word means ORVs--period. ORVs are not compatible with a Short Canyon ACEC.

Why can't the ACEC be listed for both its botanical resources and for non-consumptive, non-vehicular recreation?

It is true the only so-called sensitive plant species reported from Short Canyon is the Phacelia nashiana, a category 2 candidate for endangered status with the U.S. Fish and Wildlife Service. The great diversity of plant species in the canyon is worthy of notice by the BLM. The plant diversity is a feature which attracts formal and informal educational classes from far and near who come to the canyon.

Part of the charm of Short Canyon, I am told by users, is the freedom to walk anywhere and freedom from ORVs.

13-2

I hope the management plan prohibits recreational shooting outside of hunting season as this activity is not compatible with an ACEC designation and strikes terror to the hearts of other users. Men have a right to bear arms; only the BLM gives them permission to shoot in an ACEC outside of hunting season.

It is good the BLM plans to provide water for livestock via a pipeline outside the WSA which could divert the cattle, both legal and trespass cattle, away from the riparian area of the ACEC.

Please support the creation of the Short Canyon Area of Critical Environmental Concern for botanical resources and recreation.

Mary Ann Henry
Mary Ann Henry

Response to Mary Ann Henry

Response 13-1

The upper portion of Short Canyon has important botanical and recreational values. The value for recreation use involves hiking, sightseeing and day-use. Vehicles will be confined to one designated route of travel which ends at a parking area on the east side of the proposed ACEC.

Response 13-2

Restriction on hunting and shooting within the ACEC will be considered in the management plan.

329 Perdw
Ridgecrest, CA 93555
Nov. 22, 1987

RECEIVED
BUREAU OF LAND MANAGEMENT

33

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

13A

Dear Plan Amendments:

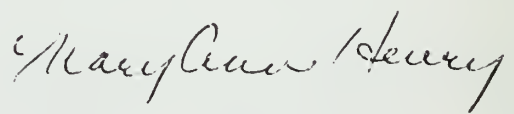
I wish to support the following Plan Amendments for 1987:

1. West Mesa ACEC, Alternative A .
3. Great Falls Basin ACEC, Alternative A.
5. Designate six new habitat management area in Mono and northern Inyo counties, Alternative "A".
6. Changing the Multiple Use Class Designation in Red Rock Canyon from unclassified to Class L; Alternative A

10.

I also, wish to reject Plan Amendment #10, changing grazing cattle allotment to ephemeral-perennial.

11. I accept alternative A of this Amendment
12. I support the closure of San Sebasitna Marsh ACEC to vehicles.



Mary Ann Henry

RECEIVED
 NOV 25 PM 1:35
 DISTRICT

P. O. Box 3707
 South Pasadena, CA 91030-6707

November 20, 1987

14

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

I wholeheartedly support designating the entire drainage of Short Canyon, Kern County, north of Walker Pass, including the canyon ridges at higher elevations, as an Area of Critical Environmental Concern as proposed as Amendment Number 2 to the California Desert Plan.

Having visited Short Canyon I can attest to the fact that it contains remarkable botanical diversity which deserves protection. The Phacelia nashiana which grows there is a spectacular flower, a candidate for endangered status with the U. S. Fish and Wildlife Service.

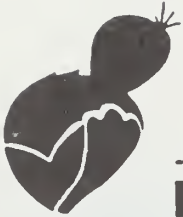
The special nature of this canyon would argue against allowing off-road vehicle use there. It should remain undisturbed by ORVs.

Cattle grazing should be minimized in Short Canyon. Cattle can be particularly hard on an area such as this. I understand that a water pipeline from the riparian area to outside the Owen's Peak Wilderness Study Area Number 158 has been proposed by a recent Allotment Management Plan as a way to divert the cattle from this riparian area of the ACEC and I support this proposal.

Sincerely,



Richard C. Schwabe



4210 ELDERWOOD DR. SEABROOK, TEXAS 77586

DESERT RESEARCH INTERNATIONAL

A NON PROFIT TAX EXEMPT ORGANIZATION

15

California Desert District
BLM
1695 Spruce St.
Riverside, California 92507

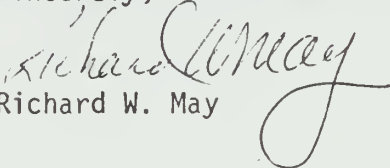
Attn: Plan Amendments

Dear Sir,

I would like to voice my support for Plan Amendment #2 for designation of the Short Canyon Area as an ACEC. The diversity of flora and fauna, including at least one candidate species for status as Endangered, make it a viable candidate. Based on the my field experience in this area, it would appear that the entire drainage should be included, incorporating the Short Canyon Falls area. I am also concerned about the cattle grazing. Serious consideration should be given to diverting cattle from this area, either through the pipeline proposal or other means (excluding fencing).

Please submit my comments to the upcoming public review.

Sincerely,


Richard W. May

RECEIVED
DEC 2 1987
107 DEC -2 10 2:49
60

CROWN MINING CORPORATION
 110 Newport Center Drive - Suite 200
 Newport Beach, CA 92660

December 3, 1987

16

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

Re: Proposed Plan Amendments - California Desert Plan

Gentlemen:

16-1 [The proposed 1987 Plan Amendment to the California Desert Plan dated October, 1987 under Amendment 3, Alternative A proposes, as we understand it, that the Ruth Mine be included in the A.C.E.C. boundary.

As president and principal stockholder of the Crown Mining Corporation, this is to advise you that we are opposed to the inclusion of the Ruth Mine and the eleven mining claims constituting Crown Mining Corporation leased property.

These claims of Crown Mining have been under lease by stockholders of the same three families beginning in 1916. The taxes and assessment work has been paid and accomplished by them up to and including the current year.

During the period 1930 to 1942, the Ruth Mine was the largest operating gold mine in the area, producing 120 tons of ore per day. The mine was ordered closed in 1942 by the War Manpower Mining Act. It has not reopened because of the factors of required start-up capital, the price of gold and the cost of labor.

Five years ago Crown Mining negotiated an Option of Purchase with Queenstake Resources Limited, a Canadian Corporation, 70% controlled by U. S. citizens. Since that time major expenditures have been invested to analyze the extent of the ore body by core drilling, assay reports, etc. At the present time, these geologists are on the property to further analyze the area extent and value of the ore body.

16-2 [We obvious therefore expect at some future time to mine the ore if permissible under the existing rules and regulations.

Water for domestic purposes is obtained from natural springs and piped to an 1800 gallon tank at the Ruth Mine by pipe over the leased mining claims at the Crown property. Surplus water feeds into a remote pond prepared for wildlife feeding with large trees, bushes, grass and wild mint. A natural sanctuary for birds and wild animals.

There are two caretakers located on the property providing 24 hour coverage and an owner's residence. No new residences or buildings have been constructed since 1935. Thus there has been no expansion or exploitation of the land.

Amendment 3 as originally planned deleted the Ruth Mine from the A.C.E.C. and it is our understanding your District Advisory Council recommended deleting the Ruth Mine and the Homewood Canyon area from the A.C.E.C. at their last meeting.

If, in the final draft of the plan, the Crown Mining properties including the Ruth Mine are not deleted, we respectfully request an opportunity to personally discuss this matter with your representative. It appears considerable misstatements of fact concerning the Ruth Mine in both the plan(s) and correspondence need to be clarified if any negative action is to be taken.

The B.L.M. has been provided detailed drawings and plans of the Crown Mining properties known as the Ruth Mine by both Queenstake Properties and the Crown Mining Corporation.

Respectfully submitted,

CROWN MINING CORPORATION



Fred L. Austin,
President

FLA:s

Response to Crown Mining Corporation

Response 16-1

Alternative A to proposed Amendment 3 calls for deleting the highly disturbed area at the Ruth Mine from the Great Falls Basin ACEC.

Response 16-2

An ACEC does not change the mining regulations under existing law. In the case of the Ruth Mine, the area of existing disturbance is proposed for deletion from the ACEC for the reasons stated in the Environmental Assessment.

Public lands outside the presently disturbed area will remain inside the ACEC. On these lands, the ACEC's natural resource values, scenery and wildlife, are to be protected. Wildlife resources include the Inyo brown towhee, a threatened species under the Endangered Species Act of both the State and Federal governments. These laws call for mandatory protection of this species and its habitat.

RECEIVED
CALIFORNIA DESERT DISTRICT
RIVERSIDE, CA.
1987 DEC -7 PM 1:04

4 Dec 87

17

From: Mr. & Mrs. Robert Meade
237 North Alford St.
Ridgecrest, CA 93555

To: California Desert District, BLM
1695 Spruce St.
Riverside, CA 92507
ATTN: Plan Amendments

Subject: Support for the proposed Plan Amendment #2 which would designate the Short Canyon watershed as an Area of Critical Environmental Concern.

For many years we have visited this area to enjoy the relatively readily accessible native plants and wild life. We support the proposed Plan Amendment as vital to the preservation of the varied botanical resources and to the maintenance of unspoiled nature of this canyon. We support the planned pipeline to provide water to livestock outside the canyon area but are less sure of the desirability of the cattle fencing.

Thank You

Robert Meade

Bernice C. Meade

Calif. Desert District
 Bureau of Land Management
 Attn. Plan Amendments
 1695 Spruce St.
 Riverside CA. 92507

RECEIVED
 BUREAU OF LAND MANAGEMENT
 1987 DEC -7 PM 1:05
 CALIF. DESERT DISTRICT
 RIVERSIDE, CA.

18

Dec. 4, 1987

Dear Sir or Madam,

I am writing in support of the Short Canyon Area of Critical Environmental Concern (ACEC) (Plan Amendment #2) proposal.

I teach a Desert Biology class for the Sierra Sands School District every Spring and a Biology class every Fall. (Adult School). Short Canyon is definitely the best place to go to view & study desert wildflowers. It may be the only place within a convenient distance that still has a good display of a variety of wildflowers.

In addition to taking classes there for botanical study, I have on many occasions taken out-of-town visitors or newcomers to Short Canyon so they can appreciate the desert's unique habitat, peace and quiet.

Please support the preservation of Short Canyon and the entire drainage (the wash has great wildflowers, too.) as a quiet preserve, free from motor-cycle or off-road traffic, and free from destructive cattle grazing.

Thank you,
 Judith L. Hollins

Judith L. Hollins
 65 628 Wildrose
 Ridgecrest, CA 93555

ph. 619-375-7075

To the Members of The Bureau of Land Management: 19

I urge you to make the marginal amendment to the boundary at the northeast portion of the ACEC so that Queenstake can continue its Crondo-Davenport development.

I have inherited the Davenport Mine from my mother who inherited it from my grandmother. (All these years of scraping up money for assessment work - and now when it looks as if the mine might pay off -)

Let me assure you that I have great respect - and love - for the environment and will always cooperate with the ACEC.

Because we have no water, we have few birds. Just itinerant crows, lizards, scorpions, Tarantulas. Not even many snakes. No tortoises, alas.

Charmaine Parkes

May all the Joys

of the Holiday Season

be Yours Today and Always

1633 Redcliff
Los Angeles, CA.

90026

DESERT TORTOISE PRESERVE COMMITTEE, INC.

P.O. BOX 453, RIDGECREST, CALIFORNIA 93555

7 December 1987

RECEIVED
DISTRICT
DEC 9 1987

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

20

Dear Mr. Hillier:

Thank you for the opportunity to comment on the 1987 Desert Plan Amendments. The Committee has comments on amendments 2 and 10, plus rejected amendments 87-P-2 and 87-P-15. Our comments are as follows:

Amendment 2: Support acceptance of this amendment. Livestock grazing in this canyon has resulted in degradation of one of the best wildflower areas in this part of the Sierra. The visitor use of the canyon to enjoy the plants is very heavy in the spring. Cattle should be removed from competition in this area.

Amendment 10: Urge rejection of this amendment. Major conflicts will occur between cattle grazing and wildlife if perennial forage utilization is authorized. The cattle operation must be monitored closely by the Bureau to assure that there are not too many cattle already on the range to be exceeding the ephemeral carrying capacity of the allotment.

20-1 [Rejected Amendment 87-P-2: We are very disappointed that the Bureau has rejected this proposal. The Bureau studies have conclusively shown the serious population declines here and in the surrounding region, and the relation of off road vehicle use to those declines. This area is critical to the Bureau goal of maintaining a viable, stable tortoise population in the western Mojave desert. The inability of the Bureau to effectively designate and enforce route designations in the Fremont Valley shows that another approach should be taken. This proposal is a reasonable approach to managing the geographic area as a whole and not fragmenting the valley into unworkable management designations. Considering the population condition of this species, an expansion of the ACEC to the proposed area is a mandatory initial step. Minor adjustments to the boundary could be made after careful ACEC planning is completed, not the other way around. This proposal is consistent with the recommendations developed by the tortoise working group (led by Mr. Alden Sievers) for habitat management.

20-2 [Rejected Amendment 87-P-15: This proposed amendment would have restricted camping in selected areas of high tortoise density. There has been no restrictions placed on camping locations in tortoise habitat yet in the route designation process. Camping zones up to 300 feet on each side of all roads is a large area of critical habitat which has heavy impacts by camping. This amendment and the one above

were topics identified by most participants in the tortoise working group as high priority to improve habitat management.

We request a copy of your final environmental assessment.

Sincerely,


George E. Moncsko, President,
Desert Tortoise Preserve Committee

Response to Desert Tortoise Preserve Committee, Inc.

Response 20-1

See Response 11-1.

Response 20-2

See Response 11-2.

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 DEC -8 PM 12:53
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

Peter Hillier, M.D.
1112 La Cadena Ave. #5.
Arcadia, CA 91006

December 6, 1987

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

21

Dear Mr. Hillier,

This letter represents my input to your department re: The California Desert Plan.

I am a part owner of the Jewell (or Guel), Michigan, Michigan #2, Davenport, Red Top, Hermosa (or Hermonie) mining claims. Queenstake Resources (U.S.A.) Inc. holds a lease on these properties and other nearby claims and has expended considerable time, effort and money in exploration of them and other nearby claims. Mineable reserves are indicated from the results so far and further exploration is planned.

If restrictions under the California Desert Plan were to prevent Queenstake, Inc. from continuing their endeavours it would have a negative financial impact on me. This is a fair and legitimate concern for a person to hold.

21-1

I am writing therefore to endorse and urge adoption of Queenstake, Inc.'s (see their correspondence) suggestions for Calif. Desert Plan re: 1) modification of the boundaries of the Great Falls Basin ACEC and, 2) removal of proposal to relinquish mineral rights in the Benko claims despite their nearness to the Ruth silicified sheer zone.

I feel that the several overall concerns of the California Desert Plan will not be damaged by these modifications.

Of interest, though not pertinent to this letter, I can remember as a youngster living at the Davenport mine when it was in operation.

Sincerely,

Peter Hillier, M.D.

Response to Peter Hillier

Response 21-1

An ACEC allows for multiple use and mining may continue within the Great Falls Basin ACEC under conditions that will protect ACEC's resource values.

RECEIVED
BUREAU OF LAND MANAGEMENT
DEC 7 DEC -8 PM 1:14
CALIFORNIA DISTRICT
RIVERSIDE, CA.

Michael Hillier
900 W Sierra Madre #103
Azusa, Ca 91702

December 7, 1988

22

To: Gerald E. Hillier
District Manager
California Desert District
ATTN: Plan Ammendments
1695 Spruce Street
Riverside, Ca 92507

Dear Mr. Hillier,

I am a part owner of the Davenport series of claims, located adjacent to the Great Falls Basin ACEC. I would like to take this opportunity to express my concerns over the proposed ammendments to the California Desert Plan.

The Davenport properties were originally discovered and registered by my great-grandmother in the early 1900 s, and have remained in the family ever since. Considerable eifort has been spent in the last eighty years to maintain the claims during times of both prosperity and depression.

22-1 [I support both Queenstake Inc s proposed boundary adjustments and request to maintain mineral rights in the Benko claims for the following reasons:

1. I believe the riparian habitats can be maintained in spite of continued exploration.
2. Development of the Davenport Arondo claims may be hampered without the ammended borders proposed by Queenstake. Failure to develop this property would have considerable economic impact on myself.
3. Any mining activity would be of financial help to both Trona and its population.

Thank you for your consideration on this matter.

Sincerely,
M Hillier
Michael Hillier

Response to Michael Hillier

Response 22-1

See Response to 21-1, 24-1 and 24-2.

December 7, 198

225 N. K St
Needles, CA 92363

RECEIVED
BUREAU OF LAND MANAGEMENT
DEC -9 PM 1:16
DISTRICT
NEEDLES, CA.

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

23

Dear Sir;

I did not receive a copy of the plan ammendment book until 10 days after the Ridgecrest public meeting to discuss these plan ammendments. I am writing concerning ammendment no. 10. This allotment was an ephemeral-perennial allotment rated for 150 cattle per month at the time I purchased it from the previous owners. The BLM officer, Elmo Roundy, when writing the ownership change papers, asked us to change it to ephemeral, as it would be better for us financially at that time. He stated to me and William E Evans and Lucille T. Brown, former lease holder, that the lease could be changed back at any time, with no problems.

Running on an ephemeral lease is too unstable, not being able to make any financial plans for more than three months at a time, and would cause terrific hardship by not being able to market our cattle at the proper time of year.

I am enclosing an old billing showing twelvemonths authorization livestock numbers for twelve months.

I wouldlike to comment on pages 4-12 and 4-13. The book states Ashift of leasees operation into the Piute Range would heighten stress-related impacts on desert bighorn sheep and livestock do not spend much time in that area at present. The country that the sheep use is mostly the top half of the Piute Range.

23-1 [The sheep waters are totally unaccessible by the cattle. Therefore, there is no competition for water or feed and NO possibility of disease transmission between cattle and sheep on that mountain range. I will have to contradict the statement about livestock not spending much time in the Piute foothills, as they spend at least 7 or 8 months per year on the west side of the water line and up into the foothills of the Piute range, and have for twenty or more years. The country the cattle use most of the time is too rough and rocky for the desert tortoise habitat.

23-2 [Page 4-14. The possibility of non-use of the water line would cause wildlife to suffer greatly, as the pipeline is approximately 7 or 8 miles long and supplies four water troughs and two dirt ponds which are resting places for ducks and geese and several other types of water fowl not to mention other desert wildlife.

Thank you for reading this.

A concerned desert rancher,

Joe 74 Evans

Response to Joe Evans

Response 23-1

Although there is no apparent conflict between cattle and bighorn sheep in this allotment now, increase use of perennial areas in bighorn habitat could increase the possibility of disease transmission and stress. The means of disease transmission is not yet known; the lack of competition for food and water may not eliminate problems with disease.

Response 23-2

Much of the area west of the pipeline is ephemeral. Moreover, there are significant areas in the foothills that remain unused. Cattle are also forced to regularly return to the lower portion of the allotment to water, especially in the summer. This increases the likelihood that perennials in the lower elevations will be overused, due to the yearlong presences of cattle. The development of an additional watersource along the powerline (currently in the planning stages) will only partially correct these problems.

Response to 23-3

All actions taken to reduce water flow on the pipeline will be evaluated in order to ensure that wildlife needs are met.

Queenstake Resources (U.S.A.) Inc.

Head Office: 9th Floor, 850 West Hastings Street
Vancouver, B.C. V6C 1E1
Telephone (604) 684-1218
Telex 04-508875

Reno, Nevada Office: P.O. Box 50098
Reno, Nevada 89513
Telephone (702) 356-3888

Q

December 8, 1987

California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, California 92507

Re: 1987 Plan Amendments
Great Falls Basin ACEC

24
RECEIVED
BUREAU OF LAND MANAGEMENT
1987 DEC 10 PM 2:45
CALIF. DESERT DISTRICT
RIVERSIDE, CA.

Queenstake Resources U.S.A. Inc. would like to submit the following comments and recommendations concerning the proposed 1987 amendments to the California Desert Conservation Area Plan, as provided for by the period of public review of the environmental assessment. The proposed amendments of specific interest to Queenstake Resources are Amendments Number 3 and 7, involving the Great Falls Basin ACEC.

Queenstake has conducted exploration for precious metals in the Argus mine district over the past six years. Through four separate leases and additional locations, Queenstake controls over 250 unpatented mining claims in the Argus district, a historic gold mining area within and adjacent to the Great Falls Basin ACEC. A 5,000 foot reverse circulation drilling program was completed in November 1987 on the Davenport and Orondo vein systems in the northern portion of the Argus district to further define ore reserves indicated by previous surface and underground exploration. Baseline environmental and pre-feasibility engineering studies are planned in 1988, should the drilling results merit a production decision.

Two of the proposed amendments to the California Desert Plan involve the Great Falls Basin ACEC. Amendment Number 3 proposes changes in the boundary of the ACEC, and Amendment Number 7 proposes the sale of several parcels of land within the ACEC in Homewood Canyon.

Queenstake Resources recommends that Alternative B for Amendment 3 be accepted to remove the Homewood Canyon residential area and the Argus mine district from the Great Falls Basin ACEC. Queenstake and its Lessors believe that the Northern portion of the ACEC should be returned to the BLM multiple use classification as the area has been a center for mining activities since the 1880's and is not a part of the Great Falls Basin wilderness study area in either aesthetic or geographic settings, and is primarily of residential and industrial value. The Inyo brown towhee habitat is protected by the U.S. Fish and Wildlife Service and the California Fish and Game Commission, and therefore will not be adversely effected by this boundary change.

24-1

24-1 ↑ Queenstake recommended a different boundary modification in 1986 when the plan modifications were first put up for public review (see enclosed letters), and we were wondering why these comments were not considered or addressed in Appendix B or C.

In regard to Amendment Number 7, Queenstake opposes any land sales in the Homewood Canyon area and supports rejection of this amendment. The residents with lifetime leases will be allowed to continue to occupy their homes according to BLM policy, and the potential for future minerals development on these parcels will not be adversely effected.

I would appreciate being kept informed of any and all BLM actions and proposed actions concerning the California Desert Plan. Queenstake was not notified of the public meetings in Ridgecrest in October 1987 and was not sent a copy of the proposed amendments, even though we are the largest property holder within the Great Falls Basin ACEC in terms of mineral claims.

Sincerely,



David R. Hembree
Exploration Manager U.S.

CC: Gordon Gutrath
Barrie Childs
Marion Dair
Fred Austin
Charmaine Parkes
Elwood Nutter
Thelma MacPherson

Response to Queenstake Resources (U.S.A.) Inc.

Response 24-1

Management of ACECs by the Bureau calls for multiple uses to continue to the extent that the key natural resource values are not jeopardized. An ACEC designation is both a recognition and protective classification, and provides for focused Bureau management attention to assure that the key values are protectively managed.

Significant portions of the habitat for the Inyo brown towhee occur north of the Great Falls Basin Wilderness Study Area and these habitats are removed from the private land that is used for residential purposes.

Response 24-2

Queenstake Resources (USA), Inc. 1986 comments on the draft ACEC management plan for the Great Falls Basin ACEC were carefully considered. Since the ACEC does not preclude multiple land uses, including mining, there is no justification to change the boundary. The ACEC designation is both a recognition and management classification that provides for proper Bureau management attention to assure the continued existence of the key resource of the area, namely scenery and wildlife. To date, the ACEC designation and Bureau management actions have not constrained the mining operation proposed by Queenstake Resources, Inc.

December 7, 1987.

Bureau of Land Management
1695 Avenue Street
Riverside, California 92507

RECEIVED
BUREAU OF LAND MANAGEMENT

1987 DEC 10 PM 1:23

25

8141 Div's

Please accept my Comments, as follows, concerning the
Proposed 1987 Amendment to the California Desert Conservation Area Plan Environmental Assessment.
 The California Desert Conservation Area does, indeed, contain outstanding wilderness, wild life - biological,
 cultural and scenic resources of certain national significance.

I support Amendment One (1);
 as this West mesa area contains unique natural features; with this ACEC of maximum size for maximum protection.

I support Amendment Two (2);
 as this fragile area must receive complete protection by designating $\frac{1}{2}$ of the drainage of Short Canyon as an ACEC

As to Amendment Three (3);
 I urge that the Great Falls Basin ACEC be expanded so as to further protect this important area; the entire area.

Concerning Amendment Four (4);
 I suggest that this Coyote Mountains ACEC continue in this status as an ACEC as this area contains valued features.

Concerning Amendment Five (5);
 I agree that each of the Six (6) areas in question receive habitat management and classification, as areas in
 question possess impressive natural features.

As to Amendment Six (6);
 I suggest that the lands in question be fully protected, as described the Del Canyon area is a very important
 riparian area and should be classified as a riparian preservation area.

Concerning Amendment Seven (7);
 I suggest that the B2M areas in question be retained as B2M administered lands; as the purpose of the B2M
 must be to oppose all sale / disposal of any Public lands.

As to Amendment Eight (8);
 Six lands in question must be retained as Public lands; with these lands managed to preserve their natural features.

Concerning Amendment Nine (9);
 I generally support efforts to provide access for special populations.

Concerning Amendment Ten (10);
 I urge that all cattle activities, including grazing, cease in this area; so as to restore this area and to protect
 this State Pelly natural animal and plant resources, such as for example; the desert tortoise.

As to Amendment Eleven (11);
 I oppose the Ridgecrest - Tirona Utility corridor right of way / disturbing valued habitat.

Concerning Amendment Twelve (12);
 I agree that size of vehicular closure must be increased in the San Felipe / San Felipe Creek management
 area so as to protect this areas animal and plant resources.

Sincerely,

John R. Swanson.

P.O. Box 307
 Boron, CA 93516
 December 8, 1987

RECEIVED
 BUREAU OF LAND MANAGEMENT

1987 DEC 10 PM 1:22

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

CALIFORNIA DESERT DISTRICT
 RIVERSIDE, CA.

26

SUBJECT: Comments on proposed amendments to CDCA Plan

Amendment 1 -- I support the proposed ACEC Boundary.

Amendment 2 -- I strongly support this new ACEC...I am well aware of the diversity of plantlife in the area.

Amendment 3 -- I support the alternative that will include more springs and riparian habitat, but exclude Ruth Mine.

Amendment 4 -- Your pleasure.

Amendment 5 -- Alternative B sounds plausible PROVIDED livestock is controlled (ELIMINATED!) to protect waterholes and forage for the bighorn. Also, consider the bighorn herd more appropriate for the area than wildhorses and burros.

Amendment 6 -- I support Class L designation...positively!

Amendment 7 -- Your pleasure

Amendment 8 -- Suggest you determine to what degree the desert tortoise would be affected. You contradict yourself by saying "no threatened animal species are known to exist in the affected area"

Amendment 9 -- By "special populations" I presume you mean ORV's? We don't need to enlarge upon "opportunities available in the desert"!

Amendment 10 - First thing that should be done is to PHASE-OUT the grazing allotment. Then, reject the amendment. ← Measure 10-1 good

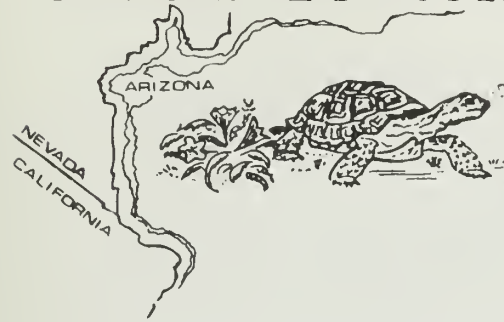
Amendment 11 - Anything you do is detrimental to wildlife!

Amendment 12 - I support Alternative A.

Sincerely,

Betty Forgey
 Betty Forgey

THE DESERT TORTOISE COUNCIL



RECEIVED
 DEC 10 11:25
 U.S. DEPT. OF AGRICULTURE
 WASHINGTON, D.C.

5319 Cerritos Avneue
 Long Beach, CA 90805
 December 9, 1987

27

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

Dear Mr. Hillier:

The Desert Tortoise Council (DTC) is pleased to respond to your request for comments on the 1987 Desert Plan Amendments.

Amendment 10: We support your rejection of this amendment. If the Piute Valley allotment is changed from ephemeral to ephemeral-perennial status, the desert tortoise population will be in jeopardy. We do not believe that this type of desert habitat can withstand ephemeral-perennial grazing pressure and at the same time sustain a healthy desert tortoise population. Studies conducted by the Nevada Department of Wildlife on the Crescent Peak Allotment in the Piute Valley have revealed that overgrazing contributed to a major die-off of tortoises in the early 1980's. The Bureau should take such information into account in rejecting this amendment.

27-1

Amendment 87-P-2: We protest the dropping of this amendment, which dealt with expansion of the Western Rand Mountain ACEC. Prroposed by the Desert Tortoise Preserve Committee, this amendment provides the best method of preserving and protecting the declining totrtoise populations in the Rand-Fremont Valley area. The Bureau states that expansion of the Rand ACEC is premature, ... "prior to prepartion of the ACEC management plan." The Bureau has had seven years to prepare a plan and has not done so. Even if the Bureau prepares a draft plan by October of 1988, many more years will be required to finalize and implement it. The tortoise populations cannot wait for plan drafts, plan finalizations, plan amendments, etc. Action is needed now! Data from the Bureau's own study site in Fremont Valley show that the population has experienced serious and significant declines between 1979-81 and 1987, and that the declines are related to human use. The Bureau often has been accused of "planning to plan." This is a prime example of such lack of action.

27-2

Amendment 87-P-15: We also protest the dropping of this amendment, which would require all vehicular traffic to remain on existing roads within the Bureau's five areas of crucial desert tortoise habitat. Crucial tortoise habitat should receive maximum protection from off-road vehicle impacts. We believe that this amendment, or a modifcaion of it to include at least the Western Mojave crucial habitats, is essential to protecting and stabilizing tortoise populations. The Bureau has demonstrated that populations are declining at a very rapid rate in the Western Mojave Desert, and it should take emergency actions to stabilize the populations. This amendment, or a modification of it, would definitely help to achieve stabilization. We have yet to see evidence that the Bureau is dedicated to protecting the tortoise through the vehicle route designation process. In fact, we want to again point out that we have not been included in this process.

Sincerely,

Glenn R. Stewart
 Glenn R. Stewart, Ph.D.
 Senior Co-Chairman

xc California Department of Fish and Game
 U. S. Fish and Wildlife Service
 DTC Board

Response to The Desert Tortoise Council

Response 27-1

See Response to 11-1.

Response 27-2

See Response 11-2.

3501 Pageant Drive
Sacramento, CA 95826
9 December 1987

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 DEC 14 PM 2:15

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

S. I. DISTRICT
R. I.

28

Dear Mr. Hillier,

In comment on the proposed 1987 amendments to the California Desert Plan, I concur with your Preferred Alternatives to accept Alternative A on #1, 2, 3, 5, 8, 9, 11, and very strongly on # 12, and also accept B on #10.

Your chart on P. S-4 states no impacts on botany or wildlife , or from geology, energy, mineral classifications in the Red Rock amendment. Yet there are impacts.

28-1 [I accept AMENDMENT #6 as far as it goes in the direction of protection. Your proposal for NIGHTMARE GULCH, however, is inadequate. You pronounce the area as valuable, and in need of seasonal protection for nesting raptors. I am aware, though, that OHVs have ignored this, and have driven through in nesting season, driving birds off. This says to me that the Gulch should be off limits year round.

28-2 [You do not mention Rare and Endangered plant species Hemizonia arida and Chorizanthe spinosa, among others, which I have personally seen in Nightmare Gulch CRUSHED by OHVs! In addition, the unusually beautiful Nightmare Gulch canyon floor has been compacted and crushed by the the OHVs, and thus visually destroyed!

28-3 [Ed Hastey told me over a year ago that Nightmare Gulch would not be transferred to Red Rock State Park because of mineral rights in the area. While you state there are some mineral claims, and that there is a low potential for sand and gravel, you seem to justify general OHV access to the Gulch because of the mineral claims. I do not find this acceptable. I would also hope that the intricately-formed canyon walls of Nightmare Gulch not be considered as mere heaps of sand to be mined.

Nightmare Gulch is THE truly spectacular area of this entire piece of land. It should be included in the transfer.

Thank you for this opportunity to comment.

Yours sincerely,

Betty H. Matyas

Betty H. Matyas

Response to Betty H. Matyas

Response 28-1

From February 1 to July 1 all public entry is prohibited in Nightmare Gulch. This six month closure was in effect in 1987 and continues as a permanent, seasonal use restriction. This closure has been enforced by both BLM and State Parks rangers with excellent compliance.

Response 28-2, 3

While ORV's are allowed on the existing route in the canyon botton, they are restricted to the established route to insure that no plants are damaged. The limited seasonal vehicle use is allowed, since this is an established 4-wheel drive route which people enjoy traveling.

December 8, 1987

Subject: Short Canyon ACEC
Plan Amendment, Support of

I am pleased to hear that this area has been nominated for ACEC status. During my 28 years residence in Redwood area, I spent many happy hours there. It was my favorite spot in the area and is well deserving of special status because of the abundance of special wildflowers and prime riparian habitat.

Over the last century of use, especially by stock, the Canyon has definitely deteriorated. I would hope that an ACEC designation would provide protection for a unique area and thus to a halt of continued destruction.

Sincerely,
Carol Panlaqui

C. Panlaqui
630 Plaza Amigo
Palm Springs, CA 92262

RECEIVED
DEC 11 PM 12:44
SANTA RITA



RECEIVED
BUREAU

United States
Department of the Interior

Fish and Wildlife Service

Lloyd 500 Building, Suite 1692
500 N.E. Multnomah Street
Portland, Oregon 97232

1987 DEC 11 AM 11:38

DISTRICT
ENVIRONMENTAL

In Reply Refer To:

Your Reference:

DEC 10 1987

30

Memorandum

To: State Director, Bureau of Land Management, Department of the Interior, Sacramento, California

From: ^{Acting} Assistant Regional Director - Fish and Wildlife Enhancement, Fish and Wildlife Service, Department of the Interior, Portland, Oregon

Subject: Review of Environmental Assessment, Proposed 1987 Plan Amendments to the California Desert Plan

The U.S. Fish and Wildlife Service (Service) reviewed the subject Environmental Assessment that addresses 12 proposed amendments to the California Desert Plan. Our specific comments on individual amendments are as follows:

Amendment No. 1: We strongly support the adoption of this amendment for the protection of the flat-tailed horned lizard (Phrynosoma mcallii), a candidate species. Recent Bureau of Land Management (Bureau) funded field studies have documented the relatively rare occurrence of this species. A report completed for the California Department of Fish and Game also clearly shows that the major portion of the geographic range of the flat-tailed horned lizard is subject to one or more potentially conflicting uses. Retention of blocks of land for protective management is a necessary measure for ensuring long-term species protection. Development of an Area of Critical Environmental Concern Management Plan, detailing measures to protect, enhance, and monitor horned lizard populations should receive a high priority by the Bureau. As noted on page 4-1 of the Environmental Assessment, designation as an Area of Critical Environmental Concern entitles an area to receive the highest Bureau priority for monitoring and funding. This increased management would greatly benefit the important wildlife resources of Short Canyon.

Amendment 3: We strongly support expansion of the current management area boundary under Alternative A to incorporate additional, currently off-site, riparian habitats utilized by the federally-listed threatened Inyo brown towhee (Pipilo fuscus eremophilus). We do recommend, however, that the proposed addition be slightly expanded to include all designated critical habitat outside of the China Lake Naval Weapons Center.

30-1

30-1 ↑ Incorporation of these areas into the Area of Critical Environmental Concern boundary should provide for consistent habitat management on Bureau-administered lands and decrease the opportunity for incompatible land uses.

Amendment 6: Change of multiple use class designation of 2,164 acres adjacent to Red Rock Canyon State Park from unclassified to Class L. We urge the Bureau to accept this amendment. As noted in the Environmental Consequences section of the Environmental Assessment, the public use limitations available in Class L lands would provide better management opportunities for resource values. Restrictions on vehicular travel and other management requirements resulting from this designation should greatly benefit the area's wildlife resources.

Amendment 7: Changing the multiple use class of two parcels of land within Homewood Canyon from Class L to unclassified. Deletion of the parcels from the Great Falls Basin Area of Critical Environmental Concern. We strongly urge the Bureau to reject this amendment. The springs on this land support the Inyo brown towhee (Pipilo fuscus eremophilus), a federally threatened species. The tapping of the springs by the residents has already reduced the size and health of the riparian areas around the springs. Allowing the residents to own the land would enable them to increase impacts to wildlife resources, including further development of the springs. Private ownership would also preclude enhancement of the spring habitat upon the expiration of the lifetime leases of the current residents.

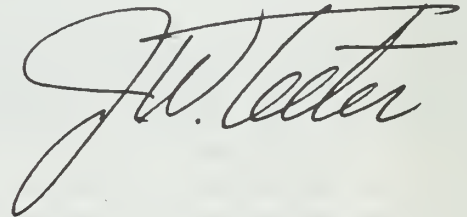
Amendment 10: Changing Piute Valley allotment from ephemeral to ephemeral-perennial. The Service recommends rejection of this amendment. The amendment appears to encompass more than the book-keeping change claimed by the proponent. Development of water sources in the Piute Range would draw cattle into this area and create grazing impacts to additional areas. These would include direct conflicts with desert bighorn and mule deer and probably indirect impacts on golden eagles and other raptors.

Amendment 12: We strongly recommend acceptance of this amendment for the protection of the federally-listed endangered desert pupfish (Cyprinodon macularius) and for several candidate species. Given the current violations of vehicle restrictions, expansion of motorized vehicle closure areas is necessary. Acceptance of this amendment should also serve to more clearly delineate vehicle restriction zones and to improve law enforcement capabilities.

30-2 Preliminary Amendment 87-P-2: We recommend that the Bureau reconsider adoption of this amendment. Given the intense and widespread use of the Fremont Valley by off-road vehicle enthusiasts and the inability of the Bureau to control this use using the route designation process, Area of Critical Environmental Concern designation is clearly warranted. The area is extremely important to the long-term perpetuation of the desert tortoise (Gopherus agassizii), a candidate species. Numerous studies have documented the incompatibility of off-road vehicle use with wildlife and associated habitat protection. Rather than defer Area of Critical Environmental Concern boundary adjustments pending development of a management plan, it is far more prudent to immediately expand the existing boundaries and consider expanded boundary line modification during subsequent management plan development. This action places the necessity for immediate plan development on recreational and other resource-impacting interests, while affording increased levels of protection to the desert tortoise and other sensitive species.

30-3 Preliminary Amendment 87-P-15: We recommend that this amendment should be reconsidered for adoption by the Bureau to afford increased levels of protection to the desert tortoise. The current 300-foot-wide vehicular camping provisions in the Desert Plan pose a significant impact to this species through direct mortality and indirectly through habitat degradation. Although such provisions can be incorporated into the vehicle route designation process, this process is nearly complete within high density desert tortoise areas in the California Desert. An amendment addressing this problem on a region-wide basis is also more logical than in a site-specific "piecemeal" fashion.

Thank you for the opportunity to provide comments at this time. If we may be of further assistance, please contact Ted Rada (Sacramento Endangered Species Office, FTS 460-4866) or Ray Bransfield (Laguna Niguel Field Station, FTS 796-4270).



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

Response 30-1

Designated critical habitat on Federal land has been included within the management area.

Response 30-2

See Response 11-1.

Response 30-3

See Response 11-2.

87EA-031



HIGH DESERT MULTIPLE-USE COALITION

P.O. BOX 1167, RIDGECREST, CA 93555

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

RECEIVED
DEC 15 PM 1:10
31

Dear Mr. Hillier:

After attending the Desert Advisory Council meeting in Ridgecrest, we would like to submit the following comments:

1. Short Canyon ACEC-ammendment #2

Although we feel that the protection of this area has already been addressed through the allotment management plan, we are in support of designating this area as an ACEC, providing that the existing vehicular access routes remain intact.

2. Great Falls Basin ACEC-ammendment #3

We very strongly support the acceptance of alternative B and feel that this addresses the concerns of most people by allowing the protection of the existing ACEC while providing a greater opportunity for a wider range of multiple-uses. After reviewing a considerable amount of documentation and contacting several knowledgeable individuals associated with the Naval Weapons Center (NWC), as well as the author of the latest studies concerning the Inyo Brown Towhee, we feel that this species is adequately protected by the existing ACEC and the ultimate protection of the NWC boundary.

3. Wildlife Habitat Management Areas-ammendment #5

While we are very much in support of any management activity to enhance wildlife, we have some concerns regarding this proposal particularly the White and Inyo Mountains.

31-1

After reviewing the Inyo-White Mountain Deer Herd Management Plan, we believe that the appropriate problems are not being addressed. This plan repeatedly implies that the major factor detrimentally impacting the deer population is the lack of predator control. This is frequently indicated throughout the plan
Examples include:

pg. 11 Mountain lions are known to subsist primarily on deer (Connolly 1981)

Deer may constitute a major portion of coyote's diets (Connolly)

pg. 24 It is quite likely that predators take a substantial number each year especially fawns

pg. 25 Numerous studies in California and elsewhere have shown that predators take many apparently healthy fawns from study population

There are some cases where the removal of coyotes from 3 study sites increased the fawn survival an average of 154%

Although it seems possible that a sufficiently wide spread predator control program would increase fawn survival, at least temporarily, it is not being suggested for a number of reasons. Predator control for increased deer numbers has not been practiced by the DFG for many years. Although current fish and game policies allow for predator control to increase deer numbers, public opinion may be strongly opposed to such practice especially on public land.

pg. 29 Even if predation is determined to be a major cause of fawn loss on spring and summer ranges, control of predators does not appear to be a viable option for a number of reasons.

This plan clearly implies that the removal of grazing is not the desired option but a secondary choice and might not improve the existing conditions appreciably

Examples include:

pg. 33 Given present knowledge, the greatest likelihood of increasing fawn survival is the elimination of grazing on riparian habitat. It is not known for certain that elimination of grazing in this particular area would improve habitat so that substantially more fawns would survive but this is a reasonable assumption based on data from other locations

Controlling predators that probably take a substantial number of fawns is not practical under present circumstances, and would not be supported by the

USFS or BLM without strong public support. Public sentiment probably would not be in favor of predator control on public lands to increase the number of deer in the hunter's bag. Although mountain lions could be controlled by hunting with dogs it is likely that the only means of controlling coyotes would be with a wide-spread poisoning program which would be very expensive.

Consequently, based on current knowledge, the most likely possibility for an increase in fawn survival is the elimination of cattle grazing.

From personal observations we disagree with the conclusions that grazing is substantially degrading the deer habitat. We are aware of numerous areas where the riparian cover is extensive and difficult to penetrate by an individual on foot. Over the last several years we have noted an alarming increase in the evidence of predation. This year during our casual recreational visits to this area we happened on to numerous predator kill sites and found several locations where young mountain lion cubs apparently died a few months after birth. Later during deer season we observed a dramatic drop in the number of doe with fawn, even though the number of doe remained relatively the same. This year we spotted only one doe with twin fawns while in the past years twins were very common. Due to information received from a DFG biologist we do not attribute the lacking fawn numbers to inappropriate buck to doe ratio. Nor do we attribute these lacking numbers to the extremely dry season because these observations were made in an excellent habitat area adjacent to a running stream.

31-2 After persuing more information from other DFG personnel we feel that some of the information contained in the 1987 Proposed Desert Plan Ammendment literature is misleading. The Desert Plan Ammendment text implies that there is considerable competition between deer and cattle for food and space, however, we have been informed that this is not the case in the White and Inyo mountains. This is also discounted by the deer herd management plan which sites the lack of local crop depredation as an indicator. The Desert Plan Ammendment description suggests that cattle and deer are socially incompatatible, however, this point has been proved false and true by many experts. We have observed on numerous occasions deer readily grazing among cattle when other adjacent areas remained unoccupied. At other locations we have noted that the absence or presence of cattle has no bearing on the number of deer utilizing the grazing. The ammendment description implies that bighorn sheep cannot be reintroduced until this propsal is intact. However, the deer herd management plan notes an existing population on Cottonwood Creek and the White Mountain Peak Bighorn Sheep Population : 1987 Status report indicates that these sheep are already present and doing quite well on White Mountain Peak.

31-3

- 31-3 ↑ According to the DFG in Bishop, cattle are not posing any threat to the sheep population and it will not be necessary to close any existing vehicular access to protect the wildlife habitat. It was however, indicated that several roads in Saline Valley area have been questionably closed by the BLM in the claimed interest of the bighorn sheep. Therefore, we are strongly opposed to the closing of any vehicular access routes because there are very few in this area and they receive extremely light recreational useage. The desert plan ammendment clearly states that water developments for cattle are imparing the wildlife habitat but on page 3-12 it clearly states that water development would likely extend deer use. Why do you consider water development for cattle unuseable by deer? We have witnessed on numerous occassions deer using watering facilities intended for cattle and during extremely dry years these spring developments are desperately needed for all wildlife.
- 31-4 ↓

Another area of concern addressed by the desert plan ammendment proposal is the protection of wild trout. The White and Inyo Mountain Ranges contain no native wild trout species, however, The Paiute Cutthroat Habitat Management Plan and the Paiute Cutthroat Recovery Plan indicates that there is a small population of these trout located in the north fork of Cottonwood Creek above Granite Meadows in the Inyo National Forest. These trout were relocated in 1946 by the DFG from the Walker River drainage. These plans propose that a section of Cottonwood Creek, extending 300 yards into BLM juristicition, be chemically treated to exterminate the existing trout for the reintroduction of the Paiute Cutthroat Trout. These plans also suggest the total eradication of all trout in the south fork and main course of the Cottonwood Creek for the reintroduction of Paiute Cutthroat Trout to allow a future fishery. Both studies indicate that the lower portions of Cottonwood Creek is a difficult habitat to manage because there is a lack of appropriate spawning gravel and will require the continual importing and washing of gravel. Both studies also state that due to their nature this species will not relocate to occupy their entire available habitat and will require constant manual relocation. Still another obstacle sited is the unwary nature of this trout species, which can only withstand very light angling pressure. These documents indicate two other existing populations in Birchim Lake in the John Muir Wilderness and the other in Cabin Creek in the White Mountains. Birchim Lake is an excellent habitat protected by the wilderness status with no established trails, no range allotments, no mining activity, and sparse recreational use. There have also been reports that this trout has attained lengths of 18 inches in this drainage but the DFG suspects that this population has been introgressed by other species. The other location, Cabin Creek, is also an excellent habitat with the existing spawning gravel, no beaver populations, no vehicular access, sparse recreational use, and meeting all requirements while allowing angling. The DFG suspects that this population was inadvertently introgressed during preparations for the relocation of this species

In light of the considerable shortcomings and apparent expense

31-5

of managing the lower portions of Cottonwood Creek as a Paiute Cutthroat Trout habitat, we feel that the available manpower and expense would be more wisely utilized by promoting this trout's population in Birchim Lake and Cabin Creek. Another possible location might be the Inyo National Forest Service's proposed Research Natural Area in the White Mountains. The utilization of these other areas might well save this species in the event of some unforeseen catastrophic event which damages the Cottonwood Creek drainage habitat. We are very strongly opposed to the extermination of the existing trout populations in lower Cottonwood Creek because it is the best vehicle accessible recreational fishery in the White Mountains and it is used as one of the few recreational opportunities of the residents of the remote Fish Lake and Deep Springs Valleys.

We wish to stress that we are not opposed to the formation of these HMA's, but we are concerned that they may not be managed appropriately and unnecessary vehicular closures may be enacted.

4. Multiple Use Class Designation-ammendment #6

We wholeheartedly support your preferred alternative of accepting this ammendment and feel that this would aid in ensuring the multiple-use of this area. We are however, opposed to the closure of any of the existing vehicular routes in this vicinity.

5. Change the Multiple Use Class of Two Parcels in Homewood Canyon-ammendment #7

We support the acceptance of this proposal because these residents developed these parcels and water sources 50 years ago at a time when this was perfectly legal. To deny these people their right to this property is a terrible injustice and we urge you to grant these people free and clear title to their property.

6. Recreation-ammendment #9

We energetically support this ammendment and at the present time we do not have any suggestions to further this concept. We do, however, feel that this proposal is a step in the right direction but falls short of what could be accomplished. We would very much like to see this trend continued in future plans.

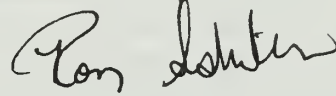
7. Utility Corridor-ammendment #11

Due to a current cease and desist order from the Lahotan Water Resources Board, this utility corridor is desperately needed to

allow the sale of waste water to the Kerr McGee Facilities near Trona. This is consistant with the need to recycle as much as possible our natural resources and would serve to protect the environment and water supply of the Indian Wells Valley while ensuring that possible water sources near Searles Valley do not require explortation. There is also a very possible future need to transport domestic water from the Los Angeles Department of Water and Power Aquaduct for use in the Indian Wells Valley and we urge your acceptance of this ammendment.

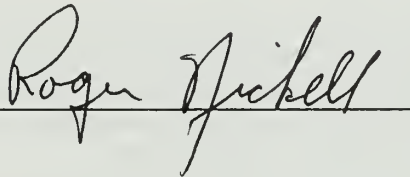
We thank you for your valuable time and hope you will consider our concerns in evaluating these proposed ammendments to the desert plan.

Sincerely.

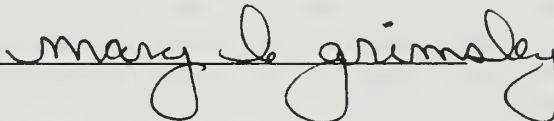


Ron Schiller, chairman

Roger Nickell, co-chairman



Mary Grimsley, secretary



Response to High Desert Multiple-Use Coalition

Response 31-1

This proposed amendment affects public lands managed by the BLM on the lower eastern slopes of the White Mountains and does not apply to the entire Inyo-White Mountains Deer Herd Management Area which also includes lands within the Inyo National Forest.

Due to the overlap of the deer winter range and livestock grazing allotments in this area, and the affinity that cattle have for aquatic and riparian habitats in arid environments, it is expected that development of management plans and actions for enhancing wildlife resources (deer, upland game, songbirds, fish and other aquatic organisms) can result in improved habitat conditions and populations of these animals. The cattle grazing season for a majority of the public lands bordering the portion of the area adjacent to the Inyo National Forest are from spring through summer. This fact coupled with the existence of the deer winter range, suggests there is good potential for both social and forage conflicts between cattle and deer in a portion of the allotment. Also, owing to the sparse distribution of water outside the streams and springs in the allotments and absence of any livestock control fences, there is strong potential for unnecessary degradation of aquatic and riparian habitats by cattle. These problems can be studied, documented and corrected through a habitat management plan.

Response 31-2

A wildlife habitat management plan would provide for full evaluation of the effects of livestock on wildlife resources in this area on a site specific basis. Literature on mule deer ecology and management indicates there is potential for social impact on deer from cattle.

It is true that deer may use water sources developed for cattle, but this also depends on the location and amount of human and livestock use of the water source. Livestock water developments, if improperly designed and located, may impact natural water sources needed by deer and other wildlife or result in the trampling of necessary vegetation cover next to water sources to the extent that significant impacts to wildlife occur.

Response 31-3

It is the policy of the BLM to complete wildlife habitat management plans before wildlife introductions occur in an area. Thus, a habitat management plan is needed before reintroduction of bighorn sheep can take place in the Soldier Pass - Piper Mountains area, as well as in the White Mountains on public land managed by the BLM. Habitat management plans are necessary to provide for planning, suitable habitat conditions and monitoring before the wildlife introduction.

The Department of Fish and Game has notified the Bureau of their intent to reestablish bighorn sheep in the Soldier Pass - Piper Mountain area and in a portion of the White Mountains. Introduction of bighorn into the Soldier Pass - Piper Mountain area is a high priority.

Establishment of the proposed Wildlife Habitat Management Areas does not include proposals for closure of vehicle routes.

Response 31-4

Cattle water facilities may be used by deer, but not necessarily. The literature on mule deer ecology and management identifies potential impacts to deer and other wildlife due to the improper location and design of livestock water facilities. For example, it is considered improper land management to allow cattle to have access to riparian and aquatic habitat in arid areas for extended periods of time, especially during the growing season, and also to provide water for cattle next to these habitats without proper livestock controls. Likewise, it would be undesirable to develop livestock water facilities in important deer habitats where cattle and deer may be on the range at the same time. The BLM plans to develop water sources for deer in the winter range located in the northeastern portion of the Inyo Mountains between Cowhorn Valley and Waucoba Canyon in order to extend deer use of the habitat farther to the east. The potential locations of these water source developments are not within a cattle grazing allotment.

Response to 31-5

Extermination of the trout population in lower Cottonwood Creek is not planned. Eradication of rainbow and brown trout in Cottonwood Creek above the natural fish barrier is planned by the Department of Fish and Game so that a population of Paiute cutthroat trout can be maintained. According to the Department of Fish and Game, lower Cottonwood Creek will continue to have a population of rainbow or brown trout to meet the needs of the angling public.



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THE WILDERNESS SOCIETY

CALIFORNIA/NEVADA REGION

10 December, 1987

32

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

Re: Proposed 1987 Desert Plan Amendments; Environmental Assessment

Dear Mr Hillier:

Thank you for the opportunity to comment on the above-referenced amendments to the California Desert Plan.

The Wilderness Society fully supports Amendments 1 - 3, and Amendments 6 - 12. We support Amendment 5, but recommend additional action. We express several concerns with Amendment 4.

Following are brief comments on each amendment.

Amendment 1 - 3.

The Wilderness Society applauds the creation of new ACECs in West Mesa and Short Canyon as well as the boundary adjustment in the Great Falls Basin ACEC.

Amendment 4.

The Wilderness Society is concerned about this particular amendment.

32-1 [While respectful of the skills of BLM Archaeologists who have conducted recent surveys, it is difficult to accept that an area was which was deemed culturally significant in the 1980 Plan now is shown to be absent such resources. Particularly in view of the fact that there is clearly an ORV conflict in the area.

Gerald Hillier
10 December, 1987
p. 2

32-2 [Finally, it is troubling that the BLM has allowed extensive ORV use of the Coyote Mountains ACEC, including organized competitive events each year.

Amendment 5.

We support the creation of the following five Habitat Management Areas (HMA): East Slope White Mountains HMA, Soldier Pass - Piper Mountain HMA, Last Chance Range HMA, and Cowhorn - Waucoba HMA. Additionally, we recommend the creation of the Sylvania Mountains HMA.

Creation of the above HMAs would provide useful management tools to assist in the protection of important wildlife species such as: the Black Toad (Bufo exsul), Chukar Partridge (Alectoris chukar), Mule Deer (Odocoileus hemionus), Desert Bighorn Sheep (Ovis canadensis nelsoni) and others.

It is important to note that the boundaries of the five HMAs overlap to varying degrees with the following Wilderness Study Areas: White Mountains (WSA 103), Sylvania Mountains (WSA-111), Last Chance Mountains (WSA-112), Piper Mountain (WSA-115), Saline Valley-WSA 117, and North Coso Range (WSA-131). With regard to these six WSA's, the BLM's preliminary wilderness recommendations in the CDCA include only the Saline Valley WSA for wilderness. It appears that a portion of the Cowhorn-Waucoba Habitat Management Area is within the recommended Saline Valley Wilderness. The other five WSAs are proposed for BLM or National Park wilderness in The California Desert Protection of 1987, (S. 7 and H.R. 371).

Section 4 (b) of the Wilderness Act (P.L. 88-577) requires that wildlife management activities in designated wilderness be performed in accordance with the so-called "minimum tool principle". Additionally, the Interim Management Policy for Lands Under Wilderness Review, or (IMP) discuss wildlife management activities in lands under wilderness review at Ch. III (E). The fact that WSAs are effected by this amendment is not mentioned in the document, nor are the above-mentioned requirements. In planning wildlife management activities in these HMAs, the Bureau is urged to plan each action in accordance with the requirements of the IMP and the Wilderness Act.

Gerald Hillier
10 December, 1987
p. 3

Amendment 6.

The Wilderness Society supports the classification of 2,164 acres of undesignated lands adjacent Red Rock Canyon State Park to Multiple Use Class L. Important raptor species including the Golden Eagle (Aquila chrysaetos), Prarie Falcon (Falco mexicanus), Barn Owl (Tyto alba) and Great Horned Owl (Bubo virginianus) will benefit from this more protective land classification.

Amendment 7.

We support the rejection of this amendment. The integrity of the Great Falls Basin ACEC is best served by rejection.

Amendment 8.

We support the recommended changes in Multiple Use Class.

Amendment 9.

The Wilderness Society supports the development of a new component to the Desert Plan's Recreation Element that provides for special populations.

Amendment 10.

The Wilderness Society supports the rejection of Amendment 10. Denial of the change in Multiple Use Class in the Piute Valley Grazing Allotment will benefit wildlife and botanical resources in the Piute Range.

Amendment 11.

We support this amendment as it represents a logical and appropriate concentration of development activities.

Amendment 12.

The Wilderness Society extends it's strong support of the proposed vehicle closure in the San Sebastian Marsh ACEC.

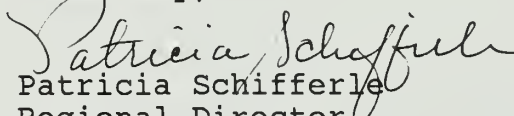
Gerald Hillier
10 December, 1987
p. 4

The area supports outstanding natural resources including cultural history, wildlife resources including habitat for both an endangered species, Desert Pupfish (Cyprinodon macularius) and three candidate species; Flat-tailed Horned Lizard (Phrynosoma mcallii), Colorado Desert Fringe-toed Lizard (Uma notata), and the San Felipe Leopard Frog (Rana cf pipiens).

Additionally, the ACEC supports 107 bird species and several important habitats provide critical wildlife habitat in the ACEC.

Thank you for incorporating our comments into the public record on the 1987 Desert Plan Amendments. Please retain our office on the mailing list for the final document.

Sincerely,


Patricia Schifferle
Regional Director
California/Nevada

Response to The Wilderness Society

Response 32-1

The Coyote Mountains ACEC was established as a precaution to protect suspected cultural resource values. Deletion of this ACEC follows one prescription in the Desert Plan. According to Appendix C of the CDCA Plan, this ACEC would be subject to intensive cultural resource inventory, since existing data only contained two prehistoric sites. A recent 300 acre inventory revealed only sparse cultural materials considered unworthy of ACEC stature.

Response 32-2

Although most of the Coyote Mountains ACEC has been designated as open to OHV use for many years, it is relatively undisturbed owing to the difficult terrain which limits vehicle use. The BLM has permitted desert motorcycle races to cross the eastern portion of the ACEC. These were preceded by field exams for cultural resources. Additionally, an enduro race was permitted this year across an existing course through the ACEC.

State of California
DEPARTMENT OF PARKS AND RECREATION
High Desert District
4555 West Avenue G
Lancaster CA 93536

The Resources Agency

December 9, 1987

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

RECEIVED
1987 DEC 14 PM 2:17
CALIFORNIA DESERT DISTRICT
BUREAU OF LAND MANAGEMENT
33

After a review of the amendments to the California Desert Plan in your October 1987 environmental assessment, the High Desert District of California Department of Parks and Recreation is opposed to amendment number six (6).

California Department of Parks and Recreation cannot accept a "change [in] the multiple use class designation of 2,164 acres of land adjacent to Red Rock Canyon State Park from 'Unclassified' to Class 'L'." as stated in amendment six (6) of the October 1987 environmental assessment.

Since the early 1970's California State Parks has expressed interest in acquiring the Senic Canyon, Nightmare Gulch area owned by BLM (part of the area within amendment 6). It was for that reason that the California Desert Plan left those lands unclassified. Once acquired by California State Parks the area would be operated as a state park.

In Alternative A It is stated that the "Designation of this land to class L would provide management of sensitive cultural resources that is consistent with that afforded resources in the surrounding area"--the surrounding area is Red Rock Canyon State Park.

33-1

Class L designation would not mean any more or less protection of any resource within the MOU Area, than now exists with an unclassified status. Most of the 2,164 acres in amendment 6 has within it a Seasonal Closure for Raptor Breeding. We understand that within that closure area, a "plan of operation" for any mining other than annual survey work is already required.

The current Memorandum of Understanding between the California Department of Parks and Recreation and the Bureau of Land Management (and the subsequent Cooperative Management Agreement) provides protection for most resources (except Geologic Features), and limits vehicular use to specified routes during designated use periods. The proposed revision of the classification to Class L land status under the California Desert Plan will not provide any greater protection for the lands in

question, nor change the current management capabilities of the property.

There exists within the 2,164 acres significant resources that need protection. These are: Raptor nesting sites; Cultural sites including a Native American Intaglio; Rare Plants; Significant Geologic and Paleontological finds. **Raptor Nesting** includes Golden Eagles (which have Federal Protection), Prairie Falcons (a "species of concern" in California) and Great Horned Owls.

A Native American Intaglio is a large figure scraped out on the desert pavement resembling a human shape. It is a registered archeological site CA-Ker-244.

Rare Plants include the Red Rock Tarweed (Hemizonia arida) which is listed by the State of California as "Rare", and currently is a category 1 candidate for Federal Government status as threatened or endangered.

The Mojave Fishhook Cactus (Sclerocactus polyancistrus) and Spiny Chorianthe (Chorizanthe spinesa) both of which are category 2 candidate for Federal Government status as threatened or endangered. Several populations of each of these plants exist within the amendment 6 area.

Additionally, three uncommon plant species whose distribution is monitored by the State of California occur within the considered area: Phacelia hastiana, Echinocactus polyancistrus, and Pholisma arenarium.

Geologically it is significant. The lands under consideration are comprised mostly of the Ricardo Formation, with a few exposures of granitics, metamorphics and intrusives evident on the eastern margin. The Ricardo Formation consists of 5,000 feet of exposed sedimentary and volcanic depositions which have been utilized by at least 15 colleges and universities during the past several years for geologic field trips. Not only are these formations important as structural and depositional study features, but encased within cavities in these rocks, uncommon minerals are found. Both Celadonite and various Zeolites have been discovered within the land in question (Amendment 6) and have received recent study by graduate students at U.C. Riverside.

Paleontological records of the Ricardo Formation are perhaps its best known feature. For almost 80 years fossils have been collected from this formation. The remains of the horse (Megahippus), camel and elephant (Gomphotherium), to name only a few, have been collected from some of the 2,164 acres in Amendment 6. Papers in preparation at this time by Paleontologist Dr. David Whistler would make the Ricardo Formation the standard comparison fossil bed for its time period (Clarendonian-Miocene Epoch).

33-2

Because these resources need to be preserved, if any classifications should be changed it should be to AGECC-- Area of Critical Environmental Concern, so that they would be protected more.

33-3

One of the reasons for the MOU agreement was for a smooth transition of ownership of the lands from BLM to DPR. If BLM does not foresee a transfer of the lands to DPR in the future, it is difficult to explain the extra work patrolling and protecting the 2,164 acres now in the MOU.

33-4

For all of these reasons, the California Department of Parks and Recreation, High Desert District would like to recommend Alternative B "rejecting amendment" (no change) in Amendment 6 of the California Desert Plan as stated in the October 1987 environmental assessment. Since the early 1970's, it has been the desire of California Department of Parks and Recreation to eventually acquire the 2,164 acres of unclassified lands discussed in Amendment 6 (six). It still is the desire of California Department of Parks and Recreation to eventually acquire the lands to round out the boundaries of Red Rock Canyon State Park into a cohesive management unit, and to preserve the land for posterity.



James R. Geary
District Superintendent
High Desert District
California Department of Parks and Recreation

Response to High Desert District, Department of Parks and Recreation

Response 33-1

The change in the multiple-use classification from "unclassified" to Class L will allow the BLM to apply the more restrictive management guidelines. Since the 2,164 acres are identified for retention, the Class L designation will provide for protective management of the resource values.

Response 33-2

An ACEC designation is not justified at this time. Although the area does have notable resource values, the Class L designation will provide for protective management, particularly regarding mining, grazing and ORV use.

Response 33-3

The purpose of the MOU is to manage the public lands consistent with park management. The MOU does not address retention or future land transfer. See also Response 33-4 and letter 038, third paragraph.

Response 33-4

In the future, the Department of Park and Recreation can submit an application under the R&PP regulations for transfer of public lands.



DESERT SURVIVORS

REC'D
DEC 14 2:20
DISTRICT

December 8, 1987

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

34

Re: Proposed 1987 Plan Amendments to the California Desert Plan--Environmental Assessment

Dear Mr. Hillier:

Desert Survivors supports Bureau of Land Management recommendations for all proposed amendments except numbers 4 and 5. We support a slight extension of the proposed action in #5 and take no position on #4.

Areas of Critical Environmental Concern. Desert Survivors strongly supports the creation of new ACECs in West Mesa and Short Canyon, and the boundary adjustment to the Great Falls Basin ACEC (Ams. 1-3). We particularly support the vehicle closure in the San Sebastian Marsh ACEC as a positive action to protect the values of that area (Am. 12). The rejection of the Homewood Canyon land sale proposal similarly serves the long-term interest of the Great Falls Basin ACEC (Am. 12).

34-1

While we defer to the archaeologists who have conducted recent field research in the Coyote Mountains ACEC, we find it remarkable that cultural values deemed significant enough to warrant ACEC status in the 1980 Plan have failed to materialize in the face of an off-road vehicle conflict. Deferral of a final decision on this amendment might be appropriate (Am. 4).

Wildlife and grazing. We support the creation of Habitat Management Areas in the northern Mojave, but recommend that the Sylvania Mountains HMA be adopted as well to protect the wildlife of that remote yet accessible range (Am. 5). We support the rejection of the proposed Piute Valley Grazing Allotment classification change in favor of protecting the wildlife and botanical resources in the Piute Range (Am. 10).

Miscellaneous. Desert Survivors supports the Recreation Element goal of improving opportunities for enjoyment of the desert by special populations

as a priority which speaks for itself (Am.9). We support Amendments 8 and 11 as appropriate concentrations of impairing activities.

Thank you for considering these comments.

Very Truly Yours,

A handwritten signature in cursive script, appearing to read "Donald Falk".

Donald Falk
President

Response to Desert Survivors

Response 34-1

See Response 32-1.

Defenders OF WILDLIFE

RECEIVED
1987 DEC 16 11 2:19
DISTRICT

December 10, 1987

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

35

Dear Mr. Hillier:

Defenders of Wildlife submits this letter as our comments and recommendations on the proposed 1987 Amendments to the California Desert Conservation Area Plan and Environmental Assessment.

Please consider our input, and include this letter in the appropriate public record.

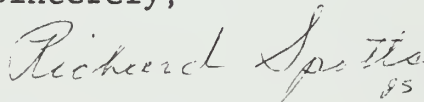
We have reviewed the 12 recommended Amendments, and we generally concur with BLM's Preferred Alternatives for these Amendments. Indeed, we are pleased that many of these suggested Amendments would increase protection for important wildlife populations and habitats.

In particular, we support BLM's Preferred Alternatives for proposed Amendments Nos. 1, 2, 3, 5, 6, 7, 10, and 12. We concur with BLM's reasoning for its Preferred Alternatives.

We urge BLM to implement its Preferred Alternatives for these Desert Plan Amendments as soon as possible.

Thank you very much for considering our views.

Sincerely,



Richard Spotts
California Representative
Defenders of Wildlife

RS/js

cc: Ed Hastey, State Director
Interested parties

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION

POST OFFICE BOX 942896
SACRAMENTO, CALIFORNIA 94296-0001
(916) 445-8006



RECEIVED
NOV 21 11 3 25
POST

December 17, 1987

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

36

Dear Mr. Hillier:

RE: Proposed 1987 Plan Amendments to the California Desert Plan;
BLM871119A-L

Thank you for requesting my comments on the above cited project. The additional information you provided in your letter of November 17, 1987, was very helpful in making my determination of effect. I concur with your determination that the proposed amendments to the California Desert Plan will have no effect on cultural resources.

While I am willing to concur in your determination of no effect, I would like to bring one point to your attention. Amendment No. 11, to establish a utility corridor, lack the kind of information necessary to make an informed decision. Based on discussions with your staff, I am willing to concur in your determination primarily on the basis that existing utility activities already occur within the proposed corridor.

I certainly agree with the premise behind corridor planning. The need to focus impacts is very important for sound management and reducing impacts to the full range of heritage resources. However, the information provided in the document does not allow me to determine if there might not be another alternative that would have less of an effect on cultural resources. I would very much appreciate it if you could keep this in mind when future corridors are proposed.

Once again, thank for requesting my comments. If my staff can be of any further assistance, please contact Dwight Dutschke at (916) 322-9624.

Sincerely

A handwritten signature in black ink, appearing to read "Kathryn Gualtieri for". The signature is fluid and cursive, with a small "for" written at the end.

Kathryn Gualtieri
State Historic Preservation Officer



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE FLIGHT TEST CENTER (AFSC)
EDWARDS AIR FORCE BASE, CALIFORNIA 93523

11 December 1987

37

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

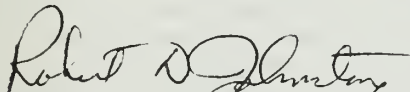
Dear Mr Hillier:

The Air Force Flight Test Center (AFFTC) at Edwards Air Force Base has reviewed the proposed 1987 plan amendments and environmental assessment and has no comments or concerns at this time. We would appreciate, however, a status report on the 1986 plan amendment recommending removal of burros from the Base proper.

Please send all information regarding the above to me at AFFTC/XRX, Edwards Air Force Base, California, 93523-5000. If we can be of any assistance in the future, please feel free to contact myself or Wendy Waiwood, of my staff, at (805) 277-3837.

The AFFTC appreciates the efforts of your agency in assuring compatible land uses throughout southern California.

Sincerely,


ROBERT D. JOHNSTONE, Chief
Plans and Policies Division

Resources Building
1416 Ninth Street
95814
(916) 445-5656
TDD (916) 324-0804

GEORGE DEUKMEJIAN
GOVERNOR OF
CALIFORNIA



THE RESOURCES AGENCY OF CALIFORNIA
SACRAMENTO, CALIFORNIA

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

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

38

Mr. William Haigh
Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507

December 29, 1987

Dear Mr. Haigh:

The State has reviewed the Environmental Assessment, Proposed 1987 Plan Amendments to the California Desert Plan, Southern California, submitted through the Office of Planning and Research.

Review of this document was coordinated with the State Lands Commission, the Colorado River Basin Regional Water Quality Control Board and the Departments of Conservation, Fish and Game, Health Services, Parks and Recreation and Transportation.

The Office of Historic Preservation in the Department of Parks and Recreation has commented directly to Mr. Gerald Hillier of your office by letter of December 17, 1987. In addition to those comments, the Department of Parks and Recreation (DPR) has comments on the proposed amendments as they relate to Red Rock Canyon State Park. DPR concurs with BLM's amendment 6 to change 2,164 acres of unclassified land adjacent to Red Rock Canyon State Park to "Class L". The current Memorandum of Understanding between the State and BLM for that area reflects this classification.

The District Superintendent and Chief Ranger at Red Rock Canyon State Park have indicated that there are archeological sites within the area that should be protected under an Area of Critical Environmental Concern (ACEC) designation (i.e.: CEA KER-244) DPR's Southern Region archeologist is studying the area to determine a recommendation of specific sites.

The contact person for DPR on this project is James Doyle, Supervisor, Environmental Review Section, P.O. Box 942896, Sacramento, CA 94296-0001, telephone (916) 324-6421.

Mr. William Haigh

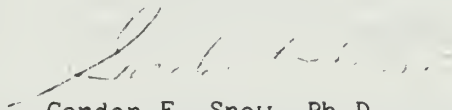
2

December 29, 1987

Comments that the Department of Fish and Game has provided are attached for your consideration.

Thank you for providing an opportunity to review this document.

Sincerely,



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

Attachment

cc: Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814
(SCH 87120401)

Memorandum

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

Date : December 21, 1987

Attn: Gordon F. Snow,
Projects Coordinator

38A

From : Department of Fish and Game

Subject: Proposed 1987 Plan Amendments, California Desert Conservation Area
- Bureau of Land Management (BLM), SCH 87120401

The Department of Fish and Game (Department) has reviewed the Draft Environmental Assessment (EA) for the proposed 1987 amendments to the California Desert Plan. The EA describes the environmental effects of accepting or rejecting each of the 12 proposed amendments accepted by the BLM for review. We have comments on the following amendments:

Amendment 1, Designate an ACEC for Wildlife, Botanical, and Cultural Resources in the West Mesa Area of Imperial County.

The Department supports BLM's decision to accept this amendment because such a designation will increase the protection of flat-tailed horned lizard habitat and other desert biological resources.

Amendment 5, Designate Six New Habitat Management Areas in Mono and Northern Inyo Counties.

38-1 [We disagree with the recommendation that the Coso Range not be designated as a Habitat Management Area (HMA). The Coso Range is a high priority area for mountain sheep reintroduction, and as such, a Habitat Management Plan (HMP) will be needed prior to reintroduction. Our experience has been that grazing Allotment Management Plans (AMPs) usually do not adequately address wildlife values. For these reasons we strongly recommend designation of the Coso Range as a HMA. We also urge that the proposed HMP for the Sylvania Mountains be prepared.

Amendment 8, Change T 12S, R 16E, Section 6, from Unclassified to Class L West of Coachella Canal and Class I East of Canal.

The Department requests that the proposed amendment be denied because the changes in Multiple Use Class of this section would encourage increased public use of the biologically sensitive Mammoth Wash area.

The Department continues to oppose increased public use of the Imperial Sand Dunes Recreation Area. This area supports both deer and desert tortoise populations which would be severely impacted if development and increased use were to occur.

Amendment 10, Change Piute Valley Allotment from Ephemeral to Ephemeral-Perennial, With a 720 AUM's, All Allocated to Cattle.

The Department supports BLM's decision to reject the proposed amendment. Rejection of this amendment and enforcement of the ephemeral status would result in a net beneficial impact on vegetation and wildlife resources of the area. Perennial grasses would increase and overall range conditions for wildlife would improve. If minimum forage production requirements for livestock are not met, livestock would not be allowed to graze. During periods of non-use, water being diverted from Piute Creek for livestock use would remain in the stream, increasing the flow further downstream and expanding and enhancing riparian areas associated with this stream. This appears to be particularly true in the area owned by the Department.

Amendment 12, Change Vehicle Access Designation from "Limited to Approved Routes" to "Closed" in a Portion of the San Sebastian Marsh ACEC.

The Department supports BLM's decision to accept the amendment (Alternative A). The Department and BLM have cooperated in the preparation of the San Sebastian Marsh ACEC. One of the management prescriptions was closure of the area to all vehicle travel. This closure is important to the continued existence of sensitive plant species, and the Colorado desert fringe-toed lizard, the flat-tailed horned lizard, the San Sebastian leopard frog, and the state- and federally-listed endangered desert pupfish.

Table B-2, Amendments Dropped.

We have the following comments regarding BLM's decision to drop the proposed amendments:

Amendment 87-P-19-Prohibit All Grazing South of I-10 in the Ford Dry Lake Allotment.

38-2 ↓ The Department disagrees with BLM's decision to not consider this amendment: elimination of domestic sheep grazing south of I-10 on the Ford Dry Lake Allotment.

38-2 We request this issue be resolved in the habitat management plan being prepared for the Chuckawalla Mountains. We have provided BLM with extensive information relative to the potential and existing impacts of livestock disease on bighorn sheep. Continuing domestic sheep grazing in this area may preclude effective management of bighorn sheep in the Chuckawalla Mountains. Therefore, the Department recommends against domestic sheep grazing in this area.


Table B-3, Amendments Deferred.

We have the following comments regarding BLM's decision to defer the following proposed amendment:

Amendment 87-P-17, Eliminate the Lazy Daisy Grazing Allotment for a Period of at Least Five Years.

38-3 The Department disagrees with BLM's decision to defer this amendment. Our position remains that adequate studies of the type referenced on page B-10 of the Plan Amendment's EA have been completed, and that these studies indicate the desirability of removing livestock in an effort to lessen adverse impacts to bighorn sheep caused by interaction with cattle. To defer a decision on this amendment is, in our opinion, not in the best interest of wildlife, and particularly not in the best interest of bighorn sheep conservation and management efforts.

Thank you for the opportunity to review and comment on this EA. If you have any questions, please contact Fred Worthley, Regional Manager of Region 5, at 245 W. Broadway, Suite 350, Long Beach, CA 90802-4467 or by telephone at (213) 590-5113.


for Pete Bontadelli
Director

Response to Department of Fish and Game

Response to 38-1

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Response to 38-2

The issue of grazing south of I-10 was deferred until the 1988 amendments and the habitat management plan for the Chuckwall Mountains is finish.

Response to 38-3

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APPENDICES



APPENDIX A

RESPONSE TO JOHN D. WEHAUSEN, Ph.D.





United States Department of the Interior

BUREAU OF LAND MANAGEMENT

CALIFORNIA DESERT DISTRICT

1695 Spruce Street
Riverside, California 92507

IN REPLY REFER TO:

8000
(CA-060)

NOV 16 1987

John D. Wehausen, Ph. D.
U.C., White Mountain Research Station
1417 Bear Creek
Bishop, CA 93514

Dear Dr. Wehausen:

Thank you for your thoughtful letter and proposal regarding cattle and bighorn sheep interrelationships in the Old Woman Mountains.

Cattle and sheep have been monitored to a limited extent over the past seven years, since the Desert Plan was adopted in 1980. The degree of this monitoring, together with studies of water and expansion of water, has not been to the extent we would have liked given the level of controversy associated with the Old Woman Mountains. But staffing and funding for the range management program just haven't been fully available or divertable from other allocations. We are still hopeful of completing these studies, as you have been able to do for the sheep population.

Your letter indicates your belief that current grazing started from a 1981 Plan Amendment. That really isn't quite correct. When the Plan was adopted in 1980, it is true that there was a decision to minimize grazing south of I-40. The specific objective adopted was to do things which would encourage bighorn sheep populations south of I-40. When faced with the fallout of that, however, Assistant Secretary of the Interior Guy Martin specifically directed in the decision document (in a personally handwritten caveat) to assure that the grazing leasee be worked with, and alternatives developed which would not unduly affect Mr. Blair's operation. The grazing allotment in the Old Woman Mountains is the only such allotment established.

The 1981 Plan Amendment was an attempt to set in place a plan for assuring some ultimate protection of a limited base while developing waters to help sheep and get the cattle off the higher parts of the mountain.

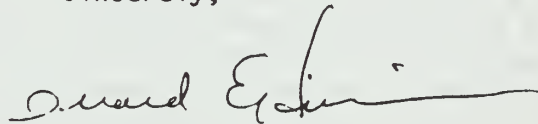
Your proposal to "experimentally eliminate livestock" for a five-year period would in effect permanently eliminate that use. There is just no alternate location where Mr. Blair could take his operation for a five-year period. Now, while grazing is a privilege, and leases have terms and conditions affecting use, conflicts, and other matters, there is a due process procedure which must be followed in cancelling a lease, even temporarily. This is true even if the lease is being cancelled for wrong doing or a violation. Thus, were we to decide now to eliminate cattle, it well could not happen for as much as two to three years because of appeal rights and the allowance in the Code of Federal Regulations for continuation of activities while an appeal is pending.

What I'm suggesting, then, is that all studies be done so that a decision, when reached, is fully defensible. You obviously would like, even with appeal rights, that decision process to be implemented this year. Unfortunately, I can neither do that legally nor in good conscience. I cannot "experimentally" put a livestock operation out of business without full cause. While I'm sorry that the data and studies contemplated by 1987 have not yet been completed, hopefully they will be within the next two to three years.

This is not an easy decision, however I believe it sound and just, and at this point, defensible. Currently we have ended grazing in the Clipper Mountains by eliminating that area from the larger part of the Colton Hills Allotment. This decision was also based on cattle-sheep competition. And that decision has been appealed to the Interior Board of Land Appeals (IBLA). Clearly that case will indicate a degree of legal standing. If we aren't sustained in that case, there probably is no way that grazing could be eliminated in the Old Woman Mountains either temporarily ("experimentally") or permanently short of gross violation of the regulations or a drought condition reducing forage.

I'm sure I've not satisfied your concerns, but I do hope that you and others will continue to develop that data needed to equitably resolve this long standing issue.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gerald E. Hillier". The signature is written in dark ink and is positioned above the typed name.

Gerald E. Hillier
District Manager

APPENDIX B

AMENDMENTS NOT CONSIDERED

TABLE B-1
 AMENDMENTS HANDLED THROUGH ADMINISTRATIVE ACTION

<u>PRELIMINARY AMEND NO.</u>	<u>AMENDMENT</u>	<u>PROponents REASON FOR SUBMISSION</u>	<u>REMARKS</u>
	<u>LIVESTOCK GRAZING</u>		
87-P-21	Eliminate cattle from Short Canyon (Jan B. Lawson)	This highly scenic area is readily accessible from Highways 14 and 395. It is popular for hiking and for spectacular spring wild flower displays. Cattle grazing in the canyon is ruining the high scenic quality. Oak groves, streams, stream banks, and meadows are being destroyed. Less than a quarter mile of fence from the base of the falls to the parking area should be adequate to keep cattle from the upper canyon.	The recently completed Walker Pass Common Allotment AMP requires the construction of drift fences to eliminate grazing in Short Canyon (see map 3-1).
87-P-28	Multiple Use Class Designation	Change the multiple use class designation from Class "I" to "unclassified" on a small parcel in Jawbone Canyon (Eugene S. McKendry, Cantil).	Only a minor class boundary adjustment is necessary to ensure this site is unclassified. It will be handled through BLM's plan maintenance procedure (43 CFR 16105-4).

TABLE B-2
AMENDMENTS DROPPED

PRELIMINARY AMEND NO.	AREAS OF CRITICAL ENVIRONMENTAL CONCERN	AMENDMENT	PROPOSERS REASON FOR SUBMISSION	REMARKS
87-P-2	Expand the Western Rand Mountain ACEC to include all habitat in the Fremont Valley supporting some of the highest density tortoise populations remaining in the western Mojave Desert. Management actions would include protection and enhancement of tortoise populations and habitat through the elimination or restriction of land uses incompatible with the goal of preserving the desert tortoise and its habitat. (Desert Tortoise Preserve Committee).		The U.S. Fish and Wildlife Service has determined that the desert tortoise warrants protection under the Endangered Species Act in the western Mojave Desert. However, official listing procedures are precluded at this time due to higher priority work. D.T.s and their habitat in Fremont Valley are being negatively affected by human activities (competitive ORV races, ORV free play, shooting, camping). Collection of tortoise probably occurs. Due to the intensity of recreational use in this area, impacts to the D.T. population are probably greater than have been documented at the nearby Natural Area. The "moderate" use class designation allows excessive and inappropriate uses to continue in this area. An ACEC management plan would identify management actions needed to protect and enhance the tortoise population and habitat.	It would be premature to consider an expansion of the ACEC prior to the preparation of the ACEC management plan. This plan will be prepared by October, 1988. Should any boundary changes be necessary, the plan will make a recommendation.
87-P-6	Discontinue ACEC status for the Great Falls Basin ACEC and manage the lands according to Multiple Use Class "L" guidelines. (Kenneth Taylor, Peter Cummings, Normal Riggle).			Several boundary adjustments are considered by this EA. However, the question of whether or not an ACEC is

TABLE B-2
AMENDMENTS DROPPED

<u>PRELIMINARY AMEND NO.</u>	<u>AMENDMENT</u>	<u>PROponents REASON FOR SUBMISSION</u>	<u>REMARKS</u>
87-P-27	Modify the boundary of Saline Valley ACEC (#4) to remove the Morning Sun Millsite (Fred Johnson).	Inyo brown towhee, which this ACEC is supposed to protect, occurs on the China Lake Naval Weapons Center and has access to may springs there. Wildlife and scenic values can be protected without an ACEC.	warranted in the Great Falls Basin has already been considered, in the Desert Planning Process.
87-P-13	<u>MOTORIZED VEHICLE ACCESS</u> Prohibit ORV activity at Windy Point (near Palm Springs)(Sandy Carmichael, Snow Creek).	This pre-existing millsite within the Saline Valley ACEC has potential for increased and possible conflicting uses. This small boundary change would prevent future use conflicts and would not cause significant environmental impact.	Whether or not the millsite was within an ACEC, its development would be guided by a plan of operation. Removal of ACEC status would not make any practical difference in future uses.
		Off-road vehicle use has been increasing in the Windy Point area for the last five years causing the following effects: 1) Recreationists trespass onto adjacent communities of Snow Creek, Palm Springs Oasis, and Western Village. Residents are annoyed and fear a potential fire hazard from sparks from faulty equipment, smoking, and bonfires; 2) there is potential contamination of well water used at Palm Springs Oasis and Western Village from gasoline and oil products spilled into the stream by ORVs; 3) The situation is hazardous for recreationists because the stream and aqueduct water which they use is contam-	The parcels of public land near Windy Point are "unclassified"; that is, they have not been designated as either class C, L, M, or I by the Desert Plan. In addition, private lands are intermingled, upon which there are also no access controls. In unclassified areas, BLM's route approval process is applied to identify routes which should be opened to vehicular travel. No routes have been opened at Windy Point. Therefore, a formal designation of Windy Point as a closed area would not change the on-the ground situation.

TABLE B-2
AMENDMENTS DROPPED

PRELIMINARY
AMEND NO.

AMENDMENT

PROponents REASON FOR SUBMISSION

REMARKS

nated by manure from grazing cattle;
4) Camping areas are unsanitary and filled with trash; 5) This highly scenic area is being spoiled by ORV activity; and 6) This is habitat for the fringed-toed lizard, a federally-listed species.

A feasibility study and hearings were conducted this past summer by BLM, Riverside County, and the City of Palm Springs on the Windy Point situation. Based on the results of this study, a decision on Windy Point will be made by the agencies. If that decision is to close the area, no amendment will be needed. If the decision is to open the area, an amendment would be required to open the area and designate it Class I. If the decision is to manage the area intensively, an amendment may or may not be necessary, depending on the management arrangement and the land to be acquired.

87-P-15
Require all vehicular traffic to remain on existing roads within BLM's five areas of crucial desert tortoise habitat. Stop-ping, parking, and/or vehicular camping within 300 feet of "routes of travel" would be prohibited within these areas (CA Dept. Fish and Game).

BLM has designated five areas as crucial habitat for the desert tortoise, a species listed by the BLM as "sensitive." The Plan states that the BLM will "give certain species, designated sensitive by BLM, special consideration and attention in the planning process because of their present condition and status." The objective is to minimize the

Amendment is not necessary. The 1982 Plan Amendment, which established the 300-ft camping limits, stated that "within sensitive areas BLM reserves the right to specify a narrower camping corridor." Such a requirement could be made through an activity plan or through the vehicle route designation process.

TABLE B-2
AMENDMENTS DROPPED

<u>PRELIMINARY AMEND NO.</u>	<u>AMENDMENT</u>	<u>PROPOSERS REASON FOR SUBMISSION</u>	<u>REMARKS</u>
		<p>cient, and provide greater contact between rangers and visiting public. Attention to details such as tread for pathways, curbs, and access to restrooms would make the desert available to the handicapped.</p>	
	<u>LIVESTOCK GRAZING</u>		
87-P-19	<p>Prohibit all grazing south of Interstate-10 in the Ford Dry Lake allotment (CA Dept. Fish & Game).</p>	<p>The BLM made a commitment to eliminate grazing on mountain sheep ranges south of Interstate-40 when the Plan was adopted. The BLM is also directed to "manage the public lands so as to prevent deterioration of sensitive species habitat...". The continuance of domestic sheep grazing in the southwest corner of the Ford Dry Lake Allotment will conflict with that directive, particularly in light of the small remnant population of mountain sheep still existing in the Chuckwalla Range.</p>	<p>This amendment was proposed for both the 1984 and 1985 Amendment Reviews. The change was not felt to be warranted at that time. As indicated in the 1985 Amendment EIS, BLM staff has identified only one burro mule deer here, and tortoise habitat is southwest of the allotment. No new information not available then has been provided. Therefore, the amendment will not be considered.</p>
		<p>The southern promotion of the allotment is important deer wintering range and will be degraded by sheep grazing. Burro deer have also been using this part of the allotment. Their numbers have increased due to several years of good rainfall. The Chuckwalla's remnant mountain sheep population is not adequately separated from domestic sheep which may transmit diseases</p>	

TABLE B-2
AMENDMENTS DROPPED

PRELIMINARY AMEND. NO.	AMENDMENT	PROponents REASON FOR SUBMISSION	REMARKS
87-P-20	Remove all grazing in the East Mojave Scenic Area west of Kelbaker Road (Judy Anderson, Sierra Club).	which are disastrous to native sheep populations. Finally, the southern portion of the allotment is within boundaries of critical desert tortoise habitat. The I-10 southern boundary would be a more enforceable boundary and the designation would lead to fewer domestic sheep roaming into unauthorized areas.	BLM studied grazing in the Kelso Dunes recently (1982 plan amendment) and found it was an appropriate use of the dunes.
87-P-25	<p><u>MINERALS/WILDERNESS</u></p> <p>Change the BLM's Interim Management Policy (IMP) within the CDCA as follows:</p> <ol style="list-style-type: none"> 1) Allow non-impairing temporary mining to continue, contingent on reclamation to the point of being substantially unnoticeable within 60 days after Congress designates wilderness. 2) Change management policy in the California Desert to read: "Mining operations will be considered non-impairing if BLM determines that there will only be temporary impairment of the resource." 	The BLM's policy on temporary impact (non-impairment) mining operations in recommended WSAs which demands that all operations and proposed operations "be reclaimed to the point of being substantially unnoticeable by the time the Secretary of the Interior is scheduled to make a recommendation to the President on the suitability of a WSA for inclusion in the National Wilderness Preservation System" is a	Changing the IMP is beyond the scope of what the Desert District can consider through the BLM planning process. It is a Secretarial policy, adopted after consultation with the Departmental solicitor.

TABLE B-2
AMENDMENTS DROPPED

PRELIMINARY
AMEND. NO.

AMENDMENT

PROponents REASON FOR SUBMISSION

REMARKS

any impacts that will be reclaimed to the point of being substantially unnoticeable within 60 days after Congress recommends a WSA for inclusion in the National Wilderness Preservation System, and the impacts will not degrade wilderness values."
3) Allow WSAs recommended unsuitable due to lack of wilderness criteria to fall under 43 CFR 3809 management criteria (Inyo County Multiple Use Coalition; Fred Johnson).

direct conflict with FLPWA in that in that Wilderness Preservation will not be given until Congress makes its decision at some date after 1991. The BLM is now (1987) going to demand a halt to all operations of both suitable and unsuitable WSAs before the end of 1988; they will not approve any more temporary Plans of Operation in any WSA.

This action would more closely follow the intent of FLPWA by allowing Congressional decision before negating non-impairing use on all WSAs.

If these criteria are met, the Secretary would have no problem recommending any WSA deemed suitable by the BLM.

To keep these lands in the highly restrictive use classification of "Wilderness Study" when both Wilderness and study have been ruled out is in conflict with the intent of FLPWA Sec. 603(a) and (c).

87-P-26

After each WSA mineral study is completed, all areas recognized and mapped as high mineral potential should be nominated as "Areas of Critical Mineral Potential" by the BLM. (Fred Johnson, Tecopa).

The thrust of the AQMP program is to identify areas not accessible to exploration, location, and development. These would include military reservations

TABLE B-2
 AMENDMENTS DROPPED

<u>PRELIMINARY AMEND NO.</u>	<u>AMENDMENT</u>	<u>PROPOSER'S REASON FOR SUBMISSION</u>	<u>REMARKS</u>
			as well as Bureau of Reclamation withdrawals. Lands under wilderness review are not already withdrawn.

TABLE B-3
AMENDMENTS DEFERRED

PRELIMINARY AMEND NO.	AMENDMENT	PROPOSER'S REASON FOR SUBMISSION	REMARKS
<u>LIVESTOCK GRAZING</u>			
87-P-17	Eliminate the Lazy Daisy Grazing Allotment for a period of at least five years (CA Dept Fish & Game).	<p>This action should be part of a long term program to improve mountain sheep habitat and its management and to clarify the role of cattle in transmission of livestock-associated diseases to this native species</p> <p>A 1981 amendment to the Desert Plan expanded the Lazy Daisy Allotment to include the Old Woman Mountains. The amendment stipulated that "at the end of five years (1987), there will be a full reanalysis of bighorn populations and range conditions."</p>	<p>Studies are still underway in this area. When they are completed, the proposal will be reevaluated to determine if an amendment is warranted.</p>
		<p>In 1984, CFDG hired Dr. John Wehausen to study the impacts of cattle grazing on the bighorn population in the Old Woman Mountains. His findings indicate that although competition does not seem to be a significant factor, introduction of diseases may adversely affect bighorn populations. It is likely that cattle have acted as a reservoir for viruses causing epizootic hemorrhagic disease (EHD), blue tongue (BT), and parainfluenza-3 (PI-3) within the Old Woman bighorn herd. The disease rate is higher than for any of the more productive bighorn ranges, suggesting that the reduced range carrying capacity in the Old Woman may be due to livestock-associated diseases.</p>	

