BLM_CA_Palm_Springs_South_Coast_RMP

From: alexandra syphard <asyphard@yahoo.com>
Sent: Tuesday, October 25, 2011 7:28 AM
To: Hill, Gregory C
Subject: comments on the South Coast Draft RMP/EIS
Attachments: southcoastRMP.doc

Dear Mr. Hill,

Attached please find comments on the South Coast Draft RMP/EIS. Please let me know if you have any questions or would like any clarifications.

Sincerely,
Alexandra Syphard

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Alexandra D. Syphard, Ph.D.
Conservation Biology Institute
10423 Sierra Vista Avenue
La Mesa, CA 91941
http://www.consbio.org
+1/619.865.9457 (c)
+1/619.328.1001 (w)
<<>><<>><<>><<>><<>><<>><<>><<>><<>>

Conservation Biology Institute

10423 Sierra Vista Ave.
La Mesa, CA 91941
Phone: (619) 328-1001 • FAX: (541) 752-0518
http://www.consbio.org

October 20, 2011

Greg Hill, Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, California 92262

Re: South Coast Draft Resource Management Plan Revision and Draft Environmental Impact Statement

Dear Mr. Hill:

Thank you for the opportunity to comment on the Draft Resource Management Plan (RMP) and Draft Environmental Impact Statement (EIS) for the South Coast Planning Area. The Conservation Biology Institute is a nonprofit research institution that provides scientific guidance to jurisdictions, agencies, and other organizations in their efforts to conserve and manage lands for natural resources. My comments only relate to the wildland fire and fuels portions of the management plan. Please consider the following information and corresponding recommendations relative to the plan.

Most of the fire management actions in the RMP apply to all alternatives, except for one action regarding suppression equipment. With regards to that particular action, I support alternatives B and D, to restrict suppression equipment and techniques in Special Management Areas to protect resources. However, it is the fuels management plan common to all alternatives that I have more concerns about. Some of the language and objectives in the plan support common misunderstandings about southern California chaparral ecology, and I hope some of the text can be revised to better reflect current scientific understanding.

One aspect of the fire management plan I do commend is the prioritization of fuels treatments in the Wildland-Urban Interface (WUI) and in nexus to private property. Our recent research in southern California confirms the importance of strategic location of fuel breaks because they have been most effective where they provided access for firefighting activities (Syphard et al. 2011 a & b). In fact, among the four national forests, only 22 - 47% of fires stopped at fuel breaks, even when firefighters could access them. Thus, fuel breaks are only one means of controlling fires, and recent data show that factors such as land use planning and removing dead litter from roofs and around the home may be much more effective at reducing fire risk (Syphard et al. in review, C.J. Fotheringham, unpublished data).

Unlike forested regions, where treatments and ecological resources may be mutually beneficial, fuel treatments in chaparral invariably result in negative resource impacts, including exotic species expansion, particularly from native shrubs to exotic annual grasses (Keeley et al.

2009). By facilitating the expansion of exotic species (Merriam et al. 2005, 2007), these treatments may indirectly increase fire hazard by converting shrublands with higher fuel moisture to flashy fuels that ignite readily and spread quickly. Therefore, while fuel breaks may serve as effective anchors for firefighting activities, their effectiveness is otherwise limited, they have negative ecological impacts, and they may indirectly increase fire ignitions.

Considering these drawbacks, I think it is inappropriate to state in the RFP that one goal to identify, prioritize, and implement an estimated annual average of 2,000 acres per year of fuel management over the life of the plan. This statement suggests that, instead of placing fuel breaks in appropriate places *as needed*, that the aim is to clear vegetation regardless of any scientific rationale in attempt to reach a predetermined goal of acres treated.

Recommendation: Only construct fuel breaks where they are needed for firefighter access around communities and drop the specification of a goal for acres treated per year.

Another concern I have about the wildfire management plan is the frequent reference to use of fire to maintain natural biological processes or the use of wildland fire to attain resource benefits. For example, the plan states the desire to "use prescribed fire to protect values-at-risk (life, resources, and property) and to maintain or enhance the ecosystem health," or to facilitate "use of wildland fire to achieve resource benefits."

There is a common misconception that southern California chaparral needs to burn to remain healthy. However, chaparral species typically live well beyond 100 years without a fire, and old chaparral is a significant ecological resource; it serves as a greater carbon sink than young chaparral (Luo 2007) and is habitat for many threatened and endangered species. The most serious ecological issue is that fire frequency in the shrublands now exceeds the natural range of variability. As a result, native shrublands are threatened with extirpation from repeated fires. This is because shrublands are adapted to fire-return intervals that are longer than those historically experienced in conifer forests (Sugihara et al. 2006). The problem becomes exacerbated by shrubland conversion to exotic annual grasses caused by atypically frequent fire (Keeley et al. 2005). Therefore, adding more fire to the landscape with prescribed fire represents a significant resource cost, not a resource benefit. It is more honest and scientifically valid to describe prescribed fire as a resource sacrifice that is sometimes necessary to protect communities.

Recommendation: Remove all language suggesting any resource benefit to prescribed fire or fire use and rephrase prescribed fire as a resource sacrifice that is sometimes necessary to protect homes and lives.

Another concern with the plan is the expressed intention "to target areas with fuel loading that could potentially result in catastrophic wildfires." A common misconception is that old chaparral with high fuel loads presents the highest fire risk. In fact, some places on a landscape are more fire-prone than others, and in southern California, this is infrequently related to fuel volume, but due to a combination of other human and biophysical variables. Areas with old chaparral may actually present a lower fire risk because they are located in less fire-prone places. The scientific literature, corroborated through many years of scientific research (e.g., Moritz 1997; Moritz et al. 2004; Keeley and Zedler 2009), shows that younger stands of chaparral cannot effectively reduce fire spread, particularly under severe weather conditions. Our recent

study showed that homes were often destroyed in areas where fires burned most frequently, and thus would all have very low fuel loads (Syphard et al. in review).

Although areas with high fuel loads may be more difficult and dangerous for firefighters to manoeuver through, targeting areas simply because they have high fuel volume is unlikely to reduce fire risk in areas outside of the wildland-urban interface. Fuel reduction for firefighter safety will be most effective in areas where there is access to the fuel break and where communities need protection.

Recommendation: Focus fuel treatment efforts on strategic location around the wildland-urban interface and communities rather than targeting old chaparral with high fuel loads.

Finally, I would like to commend the plan on the objective of preventing and mitigating wildland fire ignitions through coordination with partners and affected groups and individuals. In an area where humans cause the vast majority of ignitions, ignition prevention could be a very effective strategy for reducing the number of fires. I also commend efforts to use methods with lesser ground disturbance and avoiding the use of fire retardants near waterways.

Thank you for taking the time to consider my comments and recommendations

Sincerely,

Alexandra D. Syphard
Ecologist, Conservation Biology Institute

Literature cited

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BLM_CA_Palm_Springs_South_Coast_RMP

From: Kathleen Hayden <kats@znet.com>
Sent: Thursday, October 27, 2011 11:01 AM
To: Hill, Gregory C
Cc: BLM Tom Pogacnik; Congressman Issa
Subject: Requesting extension of comment period
Attachments: Supervisor Horn supports Heritage Herd.pdf; CCCDA Business Card.PDF

Dear Greg,
I am requesting an extension on the comment period for Southcoast RMP for San Diego and Riverside counties. The EIS is well over 600 pages and restoration of cultural historic free roaming wild Coyote Canyon Heritage Herd is not provided for.

Please review (from pages 18-37) http://www.eenews.net/assets/2011/09/30/document_gw_01.pdf) of the Sage Grouse decision, as this ruling is applicable to free roaming wild horse and burro herds as special status species to be managed as a candidate for ESA listing. This issue must be addressed in the Southcoast RMP to rectify the accumulative deficiencies that removed the Coyote Canyon Heritage Herd.

Dr.Cothran examined the samples of the Coyote Canyon stallions sent to him by BLM. He states "Variation is extremely low including observed heterozygosity which is independent of sample size. I have seen lower but the value of 0.2 is well below the level set as the critical level for concern
.
I am requesting that you particularly focus on the court's ruling regarding accumulative affects applicable to species of special interest and habitat mandates as NEPA and FLPMA requisites.

In view of Mountain States v. Hodel http://ftp.resource.org/courts.gov/c/F2/799/799.F2d.1423.82-1485.html "In structure and purpose, the Wild Free-Roaming Horses and Burros Act is nothing more than a land-use regulation enacted by Congress to ensure the survival of a particular species of wildlife. It is not unique in its impact on private resource owners. At the outset, it is important to note that wild horses and burros are no less "wild" animals than are the grizzly bears that roam our national parks and forests. Indeed, in the definitional section of the Act, Congress has explicitly declared "all unbranded and unclaimed horses and burros on public lands" to be "wild horses and burros." 16 U.S.C. Sec. 1332(b) (1982) (emphasis added).4"Neither the States nor the Federal Government . . . has title to these creatures until they are reduced to possession by skillful capture.") (citations omitted); Kleppe, 426 U.S. at 535-38. **(How skillful are captures that traumatize, cripple and kill wild animals?**

Additionally, this statement by BLM was from the May 2003 Proposed Nevada Test and Training Range Resource Management Plan and Final EIS Comment 87, BLM Response, pg. E-25"The issue of a wild horse as an invasive species is moot since the 1971 WHBA gave wild free-roaming horses "special" status based on their heritage of assisting man settle the "west"…."

The recent Sage grouse decision reference**s** to Special Status Species are applicable to the recovery of other special status species, namely the Coyote Canyon Heritage Herd. The displacement was directly caused by the accumulative affects of deficient RMPs and transfer of their critical herd area habitat to State Parks.

The current definition of ACECs (Aug 2011 BLM Southcoast management Plan and EIS) define areas of Critical Environmental Concern) were authorized in Section 202 C3 of FLPMA, P.L. 94-579.
ACECs are areas where special management attention is needed to protect, and to prevent irreparable damage to important historic, cultural and scenic values; fish; or wildlife resources or other natural systems or processes.etc An area meets the relevance criterion if it contains one or more of the following....significant historic, cultural or scenic value....fish and wildlife resource including but not limited to habitat for endangered, sensitive or threatened species, or habitat essential for maintaining species diversity...etc

It is important to note that there is a plethora of public support to restore this Heritage Herd. please see attached.

Your anticipated assistance is most appreciated,

Sincerely,

Kathleen Hayden

bcc orgs

BILL HORN

SUPERVISOR, FIFTH DISTRICT
SAN DIEGO COUNTY BOARD OF SUPERVISORS

April 8, 2010

The Honorable Darrell Issa
U.S. House of Representatives
2347 Rayburn H.O.B.
Washington, D.C. 20515

Dear Congressman ~~Issa~~: Darrell

I am writing to you to urge your support for the Coyote Canyon wild horses. The Coyote Canyon herd is a historically distinct population that was sequestered more than two centuries ago and remains as the last wild horse herd native to Southern California. The herd is an irreplaceable natural resource and a living tribute to the pioneer spirit of the West.

The Coyote Canyon Caballos D'Anza was formed as a non-profit to acquire a permanent, local BLM sanctuary in lieu of the Coyote Canyon Herd Area in Anza Borrego Desert State Park, where the herd is no longer permitted to range. The currently vacant Beauty Mountain grazing allotment is a viable option and is part of the herd's historic range, which was overlooked in the original range inventory. It is also within the proposed Bono Mack/Feinstein Wilderness Bill.

Additionally, the 1945 California Riding and Hiking Trail, California's first legislated trail, lies within the Beauty Mountain allotment and provides the public an opportunity to experience this unique part of California history.

Chairman John Keyes of the California Equestrian and Lands Coalition, which represents over 50,000 horse and mule owners and 12 major horse organizations, has written public statements urging the restoration of the Coyote Canyon herd and their return to their native range in the Beauty Mountain region.

Please consider adding your support to this effort.

Sincerely,

Bill Horn

BILL HORN
Supervisor, 5th District
County of San Diego

1600 PACIFIC HIGHWAY, ROOM 335, SAN DIEGO, CALIFORNIA 92101-2470
☎ (619) 531-5555 • FAX (619) 685-2555 • bill.horn@sdcounty.ca.gov

Coyote Canyon Caballos d'Anza Inc.
Heritage Herd

Robert & Kathleen Hayden

Coyote Canyon Caballos d'Anza Inc.
PO Box 236, Santa Ysabel, CA 92070
cccda@znet.com
760-782-3340
501(C)(3) #75078

BLM_CA_Palm_Springs_South_Coast_RMP

From: Dan Silver <dsilverla@me.com>
Sent: Tuesday, November 01, 2011 2:19 PM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and Environmental ImpactStatement
Attachments: EHL-SouthCoastRMP-11.1.11.pdf

Dear Mr Hill:

Please find the comments of Endangered Habitats League on this important project. Three enclosures will be transmitted electronically under separate cover. It would be appreciated if you could acknowledge your timely receipt of the comments in good order via reply message. Please let me know of any problems in transmission. A signed original will follow via US Mail.

With best regards,
Dan

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA 90069-4267

213-804-2750
dsilverla@me.com
www.ehleague.org

November 1, 2011

VIA U.S. AND ELECTRONIC MAIL

South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
<Greg_Hill@blm.gov>

RE: South Coast Draft Resource Management Plan and Environmental Impact Statement

Gentlepersons:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on the revised South Coast RMP. For your reference, EHL is Southern California's only regional conservation group. Since 1991, we have been active participants in State of California Natural Communities Conservation Planning, or NCCP, and value the partnership of the Bureau in these endeavors.

EHL supports Alternative B, the Conservation Alternative. Alternative B provides ample public access and consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as an Area of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP. It is important to note that these multiple species plans themselves balance environmental, economic, and public access needs.

However, we wish to point out significant shortcomings that cut across all the alternatives – including Alternative B. We urge that these problems be addressed and remedied in the final RMP:

1. Fuel treatments, such as thinning, clearing, and prescribed burning, have serious adverse biological consequences, such as conversion to weedy, flammable species. Thus, fuel treatments should occur only where effective – in strategic locations at the urban-wildland interface to create access points and fuel breaks for firefighting activities. (See enclosures.) Also, treatments should only be implemented on an *as needed* basis; the non-scientific, predetermined acreage target in the draft plan should be eliminated.

2. All lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern. This level of protection is most consistent with the management guidance in the plans and the species conservation goals.

3. Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's hard work on RMP Revision and the progress to date. We appreciate your consideration of these comments.

Yours truly,

Dan Silver
Executive Director

Enclosures (electronic files only)

Efficacy of fuel breaks

BLM_CA_Palm_Springs_South_Coast_RMP

From: Dan Silver <dsilverla@me.com>
Sent: Tuesday, November 01, 2011 2:21 PM
To: Hill, Gregory C
Subject: ENCLOSURES: South Coast Draft Resource Management Plan and Environmental Impact Statement
Attachments: K2011_Syphard_SoCalFuelBreaks.pdf; K2011_Syphard_LosPadresFuelBreaks.pdf; WERC PubBrief 201110 Keeley - Fire Breaks.pdf

Dear Mr Hill:

Please find the three enclosures for our comment letter submitted under separate cover.

Thank you

Dan

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA 90069-4267

213-804-2750
dsilverla@me.com
www.ehleague.org

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Comparing the role of fuel breaks across southern California national forests

Alexandra D. Syphard[a,*], Jon E. Keeley[b,c], Teresa J. Brennan[b]

[a] Conservation Biology Institute, 10423 Sierra Vista Avenue, La Mesa, CA 91941, USA
[b] U.S. Geological Survey, Western Ecological Research Center, Three Rivers, CA, USA
[c] Department of Ecology & Evolutionary Biology, University of California, Los Angeles, USA

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ABSTRACT

Fuel treatment of wildland vegetation is the primary approach advocated for mitigating fire risk at the wildland–urban interface (WUI), but little systematic research has been conducted to understand what role fuel treatments play in controlling large fires, which factors influence this role, or how the role of fuel treatments may vary over space and time. We assembled a spatial database of fuel breaks and fires from the last 30 years in four southern California national forests to better understand which factors are consistently important for fuel breaks in the control of large fires. We also explored which landscape features influence where fires and fuel breaks are most likely to intersect. The relative importance of significant factors explaining fuel break outcome and number of fire and fuel break intersections varied among the forests, which reflects high levels of regional landscape diversity. Nevertheless, several factors were consistently important across all the forests. In general, fuel breaks played an important role in controlling large fires only when they facilitated fire management, primarily by providing access for firefighting activities. Fire weather and fuel break maintenance were also consistently important. Models and maps predicting where fuel breaks and fires are most likely to intersect performed well in the regions where the models were developed, but these models did not extend well to other regions, reflecting how the environmental controls of fire regimes vary even within a single ecoregion. Nevertheless, similar mapping methods could be adopted in different landscapes to help with strategic location of fuel breaks. Strategic location of fuel breaks should also account for access points near communities, where fire protection is most important.

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1. Introduction

Wildfire is a key natural process in many ecosystems, but fire frequency, extent, and/or severity have surged across the globe in recent decades (Bowman et al., 2009; Flannigan et al., 2009; Westerling et al., 2006). The social and economic consequences of these fires are immense, with dramatic increases in property destruction and firefighting expenditures (Butry et al., 2001; NIFC, 2009). Altered fire regimes also threaten ecosystem integrity and biodiversity (Pausas and Keeley, 2009; Pyne, 2004). In many parts of the world the fire problem has been exacerbated by the continued expansion of the wildland–urban interface, where homes and lives are most vulnerable to wildfires, and where human ignitions increase the likelihood of fire occurring (Radeloff et al., 2005; Syphard et al., 2007). Mitigating the risk of wildfire at the wildland–urban interface, therefore, is now described as a major objective in the National Fire Plan (2001), the Healthy Forests Restoration Act (2003), and other federal fire management documents. The primary approach advocated for mitigating fire risk is to reduce hazardous fuel loads through fuel treatments of vegetation in wildland areas. In the last decade, expenditures on fuel treatments and area treated has increased markedly (Mell et al., 2010), with U.S. federal land management agencies receiving billions of dollars and treating millions of hectares of land (Schoennagel et al., 2009).

Despite this recent surge in treatment area and expenditure, fuel treatments have been a cornerstone of fire management in the U.S.A. for the better part of the 20th century. Yet, little systematic research has been conducted to understand what role fuel treatments have played in controlling fire, which factors influence this role, or how the role of fuel treatments may vary over space and time. A number of simulation studies have improved our understanding of potential fuel treatment effectiveness in modifying forest fire behavior (e.g., Finney et al., 2007; Miller and Urban, 2000; Schmidt et al., 2008). However, most empirical studies have focused on relatively localized effects when fires have intersected fuel treatments on forests (e.g., Finney et al., 2005; Martinson and Omi, 2003; Raymond and Peterson, 2005; Schoennagel et al., 2004). Due to this relatively small temporal and spatial scale (but see

* Corresponding author.
E-mail addresses: asyphard@consbio.org (A.D. Syphard), jon_keeley@usgs.gov (J.E. Keeley), tjbrennan@usgs.gov (T.J. Brennan).

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Syphard et al., in press-b), these studies have not contributed to an understanding of factors that influence sustainable fuel treatment performance over broad landscapes. This is important because many parts of the western U.S. that intersect with urban environments comprise heterogeneous landscapes that include forest and non-forested ecosystems and because strategic planning requires an understanding of how repeated fire events over time are affected by fuel treatments.

Due in part to the paucity of appropriate research, there is no comprehensive fire policy in the United States that provides forest mangers with science-based guidance on where, how, and when fuel treatments should be conducted (Agee et al., 2000; Franklin and Agee, 2003). Instead, within-agency policies are established and implemented according to the agencies' missions and objectives, and many policies are not publicly reviewed or debated (Franklin and Agee, 2003). Developing scientifically based general principles and guidelines for using fuel treatments to control fires could benefit managers if these guidelines were to facilitate decision-making with regards to strategic placement and tactical response. Given limits in time and money, managers need to prioritize where to place new fuel treatments and to determine the level of maintenance needed for current fuel treatments (Dellasala et al., 2004). Thus, a scientifically based methodology and set of principles could make the decision-making process not only easier but more defensible as well. Furthermore, a better understanding of the factors that influence the role of fuel treatments could lead to the identification of additional management considerations and the development of improved management practices.

The primary problem with development of general guidelines for fuel treatments is that fire-prone regions are highly variable with regards to their natural fire regimes and the factors that control them. Fire regimes vary as a function of forest type, fuels, terrain, climate, and ignition sources (Pyne et al., 1996; Keeley et al., 2009), and fuel treatment effectiveness may also vary according to these factors (Schoennagel et al., 2004). In addition, human development and other infrastructure strongly influence fire regimes and vulnerability to fire. Humans start and stop fires both directly (e.g., via suppression or accidental ignitions) and indirectly (e.g., via land use planning, land cover change, exotic species introduction, climate change), and their influence varies by scale and by locale (Cardille et al., 2001; Prestemon et al., 2002; Syphard et al., 2009). These variations in fire regime and human influence complicate the notion of general principles because management programs need to account for these differences (Noss et al., 2006).

Another reason that a "one size fits all" approach to fire management is problematic is that fuel treatment objectives are likely to vary from region to region, particularly for wildland areas versus the wildland–urban interface (Keeley et al., 2009). In wildland areas, particularly in western U.S. forests, fuel treatments are intended to change fire behavior and to reduce the severity of fire effects, whereas fuel treatments in the wildland–urban interface are intended to prevent fire from spreading into communities (Radeloff et al., 2005; Reinhardt et al., 2008). Therefore, the effectiveness of fuel treatments, and the factors that contribute to their effectiveness, may change as a function of fuel treatment objectives.

One way to determine how well certain guidelines may transfer from region to region is to identify which factors affecting fuel treatment outcome are most likely to vary. Identifying these could help to determine what aspects of plans need to be developed separately for each management area. Common decision-making tools could be developed that account for regional differences in those variables. If there are factors that are universally influential across different regions or landscapes, these could help in the development of general management considerations.

In California, where a substantial portion of the landscape comprises non-forested ecosystems such as chaparral and sage scrub, fuel breaks have been a major part of fire management activities since the 1930s (Davis, 1965). Unlike forests where mechanical fuel treatments remove only surface fuels (preserving larger, older trees), fuel break construction in chaparral typically involves complete removal of vegetation, chemical herbicides, and permanent conversion of native shrublands to weedy herbaceous associations (Wakimoto, 1977).

In southern California, differences in natural fire regimes and the way fire regimes have been altered by past land use complicate fire management in the region. In the shrubland-dominated foothills and coastal valleys, fire frequency has substantially increased along with population growth and urban expansion (Keeley et al., 1999; Syphard et al., 2007). This increased fire frequency not only threatens homes and lives, but many shrublands cannot tolerate repeated fires and under such conditions are often replaced with non-native grasslands (Keeley and Fotheringham, 2003; Syphard et al., 2006). In shrubland-dominated regions, fuel manipulation projects involve a trade-off. On one hand, fuel breaks are needed to protect homes and lives, which are at an elevated risk in these crown fire shrublands; on the other hand, construction of fuel breaks typically involves complete removal of vegetation and may result in a range of ecological impacts. Thus, fire management in the region is greatly complicated by the need to balance both fire and resource management.

In the less extensive montane coniferous forests in the region, fire frequency has been unnaturally low during the last century, and fire hazard has consequently increased due to accumulated fuels associated with fire suppression and logging (Keeley, 2006), problems similar to other forests in the western U.S. (Miller et al., 2009). Because thinning and fuel manipulation is intended to improve forest vigor and reduce risk of catastrophic loss to wildfire (often by restoring forests to more historic conditions), fuel treatments and resource benefits are likely to be compatible in these forested regions (Schwilk et al., 2009). However, this model of fuel accumulation and ecological compatibility with fuel treatments has often been inappropriately applied to chaparral (Keeley and Fotheringham, 2004, 2006).

To better understand the factors that influence the role of fuel treatments in controlling large fires in southern California, and how the role of fuel treatments varies across different landscapes, we assembled a spatial database of fuel breaks and fires from the last 30 years in four national forests. For this analysis, we only considered fuel manipulation projects that were clearly intended to serve as fuel breaks, which are defined as wide blocks, or strips, on which vegetation was manipulated to create lower fuel volume and reduced flammability (Green, 1977). Thus, prescribed fires and burn piles were excluded, as were any dozer lines created to aid suppression activities during the time that a fire was burning. We analyzed relationships among fires and fuel breaks to answer:

(1) What are the most important environmental and management variables affecting the role of fuel breaks in controlling large fires, and do these factors vary among national forests?
(2) What are the primary factors affecting the spatial pattern of fires and fuel break intersections, and do they vary among national forests?

Because we restricted our analysis to U.S. Forest Service national forests, we assumed these landscapes would be broadly similar in the tactical approaches used in the construction and maintenance of fuel breaks. Thus, this study could help determine how well management approaches for one national forest may transfer to other national forests. Also, on these largely non-forested landscapes we assumed that the primary management objective for fuel breaks in the region is to control the spread of fire and protect communities.

Table 1
Characteristics of fires and fuel breaks in the four southern California national forests. Fire rotation was calculated from 1980 to 2007.

	Angeles	Cleveland	Los Padres	San Bernardino
Area (ha)	26,375	21,117	61,464	30,408
Number of fires since 1980	175	118	96	253
Fire rotation period (years)	32	14	35	30
Fuel break length (km)	1834	482	550	1199

2. Methods

2.1. The national forests of southern California

The area of study included the Los Padres, Angeles, San Bernardino, and Cleveland National Forests (Table 1), an area spanning the extent of the state's South Coast Ecoregion (Keeley, 2006), which encompasses approximately 3.4 million ha (8% of the state) and is home to more than 19 million people (US Census 2000) (Fig. 1). Although the region is the most threatened hotspot of biodiversity in the continental US (Hunter, 1999), the national forest lands together occupy more than 1.5 million ha and offer some measure of protection for the region's biodiversity.

The South Coast Ecoregion is characterized by a Mediterranean-type climate, with cool, wet winters and warm, dry summers. Chaparral shrublands are the most extensive vegetation type, but there is extraordinary ecosystem diversity in the region, owing largely to a relatively sharp elevational gradient from sea level to more than 3500 m. Therefore, chaparral forms a mosaic with other vegetation types, including coastal sage scrub shrublands, grasslands, oak woodlands, and montane coniferous forests, and natural fire regimes are correspondingly variable (Keeley, 2006; Wells et al., 2004).

Fire management on the national forests is the responsibility of the U.S. Forest Service. The two primary strategies for management are to (1) suppress all actively burning fires, and (2) reduce the extent of future fires through mechanical construction of fuel breaks and limited use of prescription burning. We focus exclusively on fuel breaks in this study.

2.2. Data for dependent variables: fuel break outcome and fire/fuel break intersections

We acquired information on historic fuel breaks and their location from U.S. forest service staff on each of the four forests. We developed a digital spatial database of fuel breaks for the four forests by combining existing GIS layers with files that we created ourselves by digitizing fuel breaks that had been drawn on paper maps. Due to the substantial number of fuel breaks that were hand drawn, we conducted follow-up interviews to validate the newly digitized data.

On all the forests, we overlaid the fuel break GIS layer with fire perimeter polygons compiled by the California Department of Forestry-Fire and Resource Assessment Program (CALFIRE). The fire perimeter data represent the largest fires, with a minimum mapping unit of 4.04 ha (10 acres).

To evaluate factors affecting fuel break outcome, we first used a GIS overlay to identify all events in which a fire intersected a fuel break (within a 100 m buffer distance to account for potential data uncertainty). These events were considered potential case studies to retain for subsequent analysis. To be included for consideration, the date of the fire had to be later than the date of fuel break construction. For the case studies, we conducted a preliminary assessment as to whether fires stopped or crossed over fuel breaks, and then confirmed the outcome during personal interviews with firefighters who had first-hand knowledge of the event.

Table 2
Variables considered and retained in the multiple regression models explaining number of fire and fuel break intersections in three national forests. All variables retained in the models are designated through a significance symbol.

	Angeles	Los Padres	San Bernardino
Elevation	*		*
Slope			
Solar radiation		*	
USFS fuel model	*		*
Distance road		**	
Distance development			
Distance trails		**	
Historic fire frequency	***	**	***
Ignition density	*	*	
Deviance explained	37.27	27.55	54.7

* $p = 0.05$.
** $p = 0.01$.
*** $p = 0.001$.

Although data for some of the explanatory variables were acquired during personal interviews, we also used a GIS to extract information for other explanatory variables to relate to the fuel break outcome. See below for description of explanatory variables. For this analysis, we extracted data only from the portion of the fuel break that intersected the fire and averaged values across that area. In some cases, fires stopped at a portion of the fuel break, but ultimately crossed over the fuel break. For those cases, we classified the fuel break as not having stopped fire (for statistical analysis purposes only), and we only extracted explanatory variables for the section of the fuel break where the fire crossed over.

To analyze factors influencing the number of times fires intersected fuel breaks, we spatially stratified and classified all fuel breaks according to the number times they intersected fires during the study period. We only considered fires that had occurred since 1980, and to ensure that all fuel breaks had an equal chance of experiencing a fire, we only looked at fuel breaks that had been constructed before 1980. From this spatially stratified layer, we randomly selected point samples (greater than 1 km apart, to avoid spatial autocorrelation) to extract environmental data used as explanatory variables. The dependent variable was number of intersections at each sample location.

2.3. Explanatory variables for role of fuel breaks

The factors we considered as potentially influencing the role of fuel breaks on the forests included human and biophysical variables that have previously explained landscape-scale fire patterns in the region (Syphard et al., 2008), and that we used in a previous study of fuel breaks on a single national forest (Table 2, Syphard et al., in press-a). In addition to static landscape features, we also considered variables related to the actual event when a fire intersected a fuel break, including characteristics of fires, fuel breaks, vegetation age, and firefighting activities.

For the human variables, we considered distance to roads, trails, and development (Table 2) because fire ignitions in the region tend to occur near human activities (Syphard et al., 2008). We also hypothesized that these human variables may influence firefighting access and resources. For these three variables, we developed continuous grid surfaces reflecting the Euclidean distance to the nearest feature (road, trail, or development) and extrapolated values from those grids for the areas where fuel breaks intersected fires.

Biophysical variables (including climate, terrain, and fuels) influence fire spread rate, fuel moisture, flammability, and fire intensity (Pyne et al., 1996; Whelan, 1995). Therefore, we evaluated the potential influence of elevation, slope, solar radiation, vegetation age, and fuel model on fuel break outcome (Table 2). After

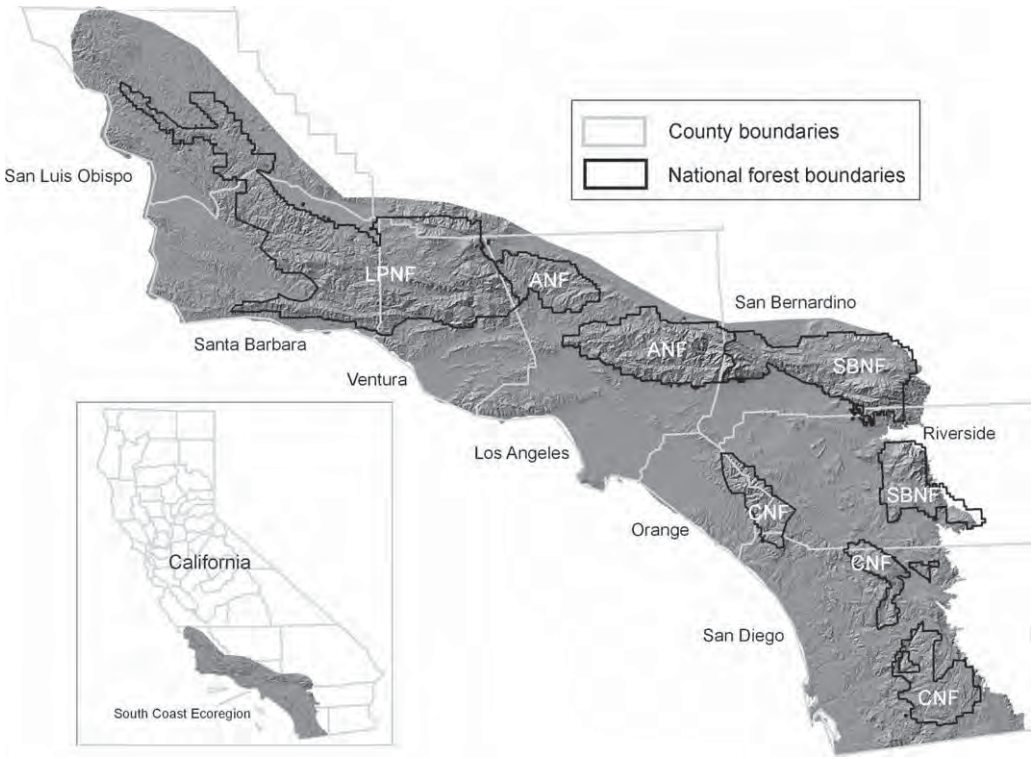

Fig. 1. Study area showing the four national forests of southern California. ANF is Angeles National Forest, CNF is Cleveland National Forest, LPNF is Los Padres National Forest, and SBNF is San Bernardino National Forest.

preliminary regression analysis, we found that climate variables were significantly correlated with terrain variables, so we did not include them. Because most fires are stand-replacing in southern California shrublands, we determined vegetation age by calculating the time since last fire in the area immediately adjacent to the fuel break before the fire intersected it.

Severe weather conditions are likely to strongly influence fire spread rates and intensity (Moritz et al., 2004; Keeley and Zedler, 2009), and lead to conditions that are dangerous for firefighters (Halsey, 2005). However, previous analysis indicated that, because weather is highly variable over space and time, it is difficult to attribute exact weather conditions to the moment of intersection (Syphard et al., in press-a). Instead, we considered fire size and season as potential explanatory variables because they indirectly reflect the severity of weather conditions (Finney, 2003; Westerling et al., 2004), particularly because of the importance of autumn Santa Ana winds in this region (Moritz et al., 2010). We calculated fire size from the fire perimeter data through GIS calculations, and we derived fire season from the attributes of the fire perimeter data. We reclassified the months of the fires into winter and spring (January through May), summer (June through August), and autumn (September through November) to reduce the degrees of freedom in the data.

We obtained information on fuel break condition and firefighting activities through personal interviews with firefighters and managers who were most familiar with the fire events. Fuel break length was calculated from the GIS files, but data on fuel break width were largely unavailable for all four forests. Because written fuel break maintenance records were often unavailable, we determined how well the fuel break had been maintained by asking fire personnel to indicate the condition of the fuel break at the time the fire intersected it on a scale from one to three. The ranking reflected poor to excellent conditions, with poor reflecting fuel breaks where the vegetation had almost entirely regrown, and excellent reflecting fuel breaks that were either entirely grass, or no vegetation had regrown. To evaluate the importance of management activities, we also asked personnel to indicate whether they were able to gain access to the fuel break for firefighting (yes or no) and whether they had sufficient resources available (including manpower and equipment) to fight the fire, again on a scale of one to three, from poor (no resources) to excellent (full resources).

2.4. Explanatory variables for mapping number of intersections

To explain and map areas where fires and fuel breaks are most likely to intersect, we evaluated the same human and biophysical variables as for the fuel break outcome (Table 2). However, we did not consider fire and management variables related to single events because we were interested in trends across the entire study period (1980–2007). In addition, we hypothesized that significantly more fire and fuel break intersections would occur in areas that were historically fire-prone. Therefore, we additionally explored historic fire frequency (derived through overlay of fire perimeters from 1878 to 2007) as well as spatially interpolated ignition density as explanatory variables.

2.5. Fuel treatment outcome: structural equation modeling

Structural equation modeling provides advantages over traditional multiple regression analysis because it uses existing information to examine potential causal pathways among intercorrelated variables and identify indirect relationships (Bollen, 1989; Grace and Pugesek, 1998). The model is statistically evaluated to determine the degree of consistency with empirical data and compare the outcomes of alternative models. Although structural equation modeling is a confirmatory approach that tests a priori hypotheses of about interrelationships among variables, it is often essential to use exploratory regression and correlation analysis to suggest which pathways to explore (Grace, 2006).

For the different national forests, we initially conducted correlation analyses and built simple and multiple logistic regression models to explore the relationships among the explanatory variables and fuel break outcome. We used logistic regression because the response variable for fuel treatment outcome was binary, indicating whether the fuel treatment stopped the fire or not. Based on the hypothesized interrelationships developed through correlation and regression analysis, we developed and tested structural equation models using Mplus version 5.1 software. Because we modeled categorical outcomes, we used the weighted least-squares with mean and variance adjustment (WLSMV) estimator. To ensure that we retained only the important pathways in the final models, we sequentially removed one path at a time to ensure that, if a path were removed, the chi-square did not increase more than 3.84 points (the single degree-of-freedom test) (James B. Grace, personal communication). We also examined the fit of alternative models through *p*-values, root mean square error of approximation, and weighted root mean square residual (Hooper et al., 2008).

2.6. Number of intersections: multiple regression and predictive mapping

To evaluate the relative influence of the explanatory variables on the number of times fires intersected fuel breaks on the forests, we developed simple and multiple Poisson regression models that were appropriate for count response variables (Agresti, 1996). Because the objective of this part of our study was to create predictive maps (rather than explore causal pathways), we only used multiple regression analysis, as opposed to structural equation modeling. We first conducted simple regression models with each variable (and quadratic terms for continuous variables) to establish rankings for entering the variables into a multiple regression.

For the multiple regression models, we entered variables according to the amount of deviance they explained [D^2, equivalent to the R^2 in ordinary least square models (Guisan and Zimmermann, 2000)] and only considered those variables that were significant at $p \leq 0.15$. We evaluated correlation coefficients in the models for all of the forests and avoided including two variables with a bivariate correlation ≥ 0.3. For each forest, we evaluated alternative plausible multiple regression models with different combinations of predictor variables and selected the best model as the one that explained the highest percentage deviance with the lowest Akaike information criterion (AIC) (Quinn and Keough, 2002). We also checked to ensure that overdispersion was not present in the models.

After selecting the best multiple regression models, we converted them into continuous map surfaces that reflected the predicted number of fires that would intersect fuel breaks across the entire forest. We created these maps by applying the Poisson regression formula and predicted coefficients onto the GIS layers of the significant explanatory variables (as in Syphard et al., 2008). We evaluated the correspondence of the predicted number of intersections to the actual intersections that occurred through Pearson correlation coefficients. We also quantified the magnitude of discrepancy among predicted and observed values by calculating the root mean square error (RMSE).

To test how well the models that explained the number of intersections on one national forest matched the models in the other forests, we applied the models developed on each forest to the entire South Coast Ecoregion and compared the maps. To quantify the spatial correspondence among the maps, we used a Pearson's correlation coefficient to calculate pairwise correlations (Termansen et al., 2006; Syphard and Franklin, 2009). High correlations among maps would indicate that the factors controlling the spatial pattern of fire and fuel break intersections were similar among the forests, and low correlations would suggest that those factors vary.

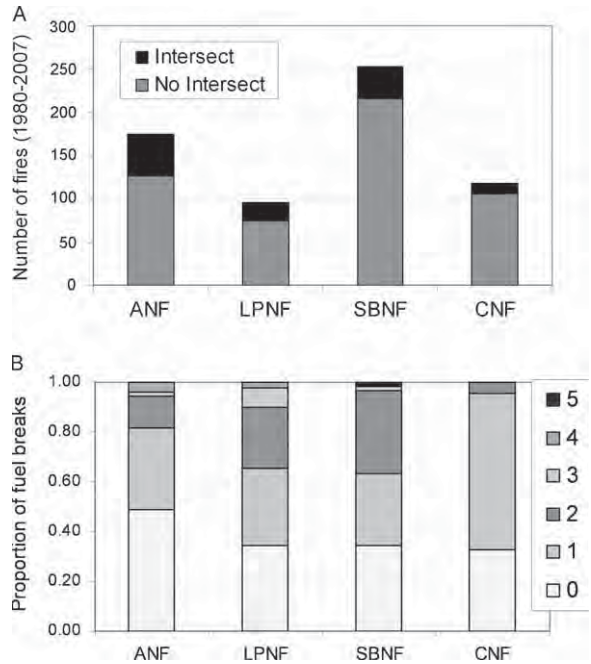

Fig. 2. Number of fires that occurred in four national forests divided into those that intersected a fuel break and those that did not intersect a fuel break (A); and proportion of fuel break area intersected by 0–5 fires from 1980 to 2007 (B). ANF is Angeles National Forest, CNF is Cleveland National Forest, LPNF is Los Padres National Forest, and SBNF is San Bernardino National Forest.

3. Results

3.1. Summary of fuel break and fire intersections and outcomes

During the 28 years of the analysis, 641 fires occurred within the boundaries of the four national forests. On average, 23% of those fires intersected a fuels treatment, but the proportion of intersections varied among the forests (Fig. 2A). In fact, the number of intersections among fires and fuel breaks on the Cleveland National Forest was only 13 (11% of the intersections), and this small number precluded us from including that forest in our statistical analyses.

For the fuel breaks that we considered in our spatial analysis of intersections (i.e., those constructed on or before 1980), approximately 25–50% of the fuel break area never intersected a fire. On the other hand, approximately 10–45% of the fuel break area intersected multiple (two or more) fires. The proportion of fuel break area that intersected fires varied among the four forests (Fig. 2B).

When fires intersected fuel breaks, the percentage that stopped at the fuel breaks ranged from 22 to 47%, and the percentage that crossed over the fuel breaks ranged from 29 to 65%, depending on the forest (Fig. 3). We distinguished another group of fuel break intersections where fires crossed over fuel breaks, but the fuel breaks did change fire behavior enough to facilitate firefighter access and eventually help with the suppression of the fire. When this group is considered along with the other cases in which the fuel break held a portion of the fire, the percentage ranged from 10 to 23% (Fig. 3).

3.2. Fuel treatment outcome: structural equation modeling

Among the three national forests that we analyzed, there were seven variables that significantly affected fuel break/fire outcomes. However, the structural equation models revealed differences in the number and combination of important variables as well as

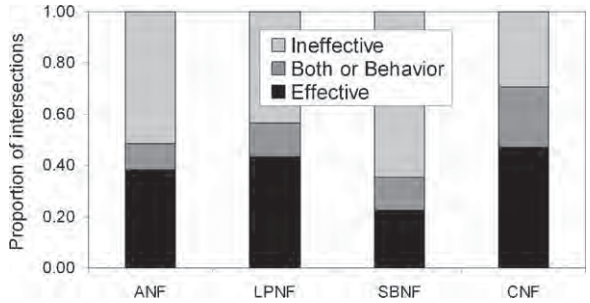

Fig. 3. Proportion of fire and fuel break intersections in four forests divided into those that effectively stopped a fire (Effective); those in which only a portion stopped a fire or that changed fire behavior (Both or Behavior); and those in which the fires crossed over the fuel break (Ineffective). ANF is Angeles National Forest, CNF is Cleveland National Forest, LPNF is Los Padres National Forest, and SBNF is San Bernardino National Forest.

differences in the interrelationships among them. We tested alternative models with different explanatory variables and different direct and indirect effects. The final model varied among the forests (Fig. 4). Despite these differences, most of the variables were common to at least two of the three forests; and three variables were common to all forests: firefighter access, fire size, and fuel break condition.

Firefighter access was the only variable to directly improve the outcome in all three forests, and it was the most influential variable for the Los Padres and Angeles National Forests. The proportion of events in which firefighters had access to fuel breaks was slightly lower in the Angeles than in the other two forests (Fig. 5C). On the Los Padres and San Bernardino forests, fire size was directly and negatively related to fuel break outcome; in the Angeles, fire size negatively affected firefighter access and thus indirectly influenced fuel break outcome. On average, the fires were smaller in the Angeles, but fire sizes were highly variable on all of the forests (Fig. 6). On the Los Padres and Angeles forests, fuel break condition facilitated firefighter access to fuel break and thus indirectly improved fuel break outcome; the relationship was direct in the San Bernardino, which reported the largest proportion of fuel breaks with low scores for fuel break condition (Fig. 5B).

The Los Padres was the only forest for which season was not important in explaining fuel break outcome, as later-season fires (i.e., September through November) had a direct negative influence on outcome for the Angeles; and for the San Bernardino, later-season fires contributed to increased fire size, so the effect was indirectly negative. Most of the fires on the Los Padres occurred in the summer months, whereas fires in the autumn were most common for the other two forests (Fig. 5E). The Los Padres was the only forest in which firefighting resources were not influential in explaining outcome. On both the Angeles and San Bernardino, resources indirectly improved fuel treatment outcome; but on the Angeles, the primary relationship was by improving access and on the San Bernardino, the primary relationship was through reduction in fire size. The overall distribution of firefighting resources, according to the interviews, was variable among the forests (Fig. 5A). Finally, the Los Padres was the only forest in which fuel break length had a significant direct and positive impact on fuel treatment outcome, and this forest had longer fuel breaks, on average, than the other two forests (Fig. 6).

The Angeles was the only forest in which vegetation age was not important. On the Los Padres, younger vegetation surrounding the fuel breaks improved firefighter access to the treatment, so the relationship was indirectly negative. On the San Bernardino, the relationship was direct and positive. Although the average vegetation age was lowest on the San Bernardino, there was a lot of variability in age for all the forests (Fig. 6).

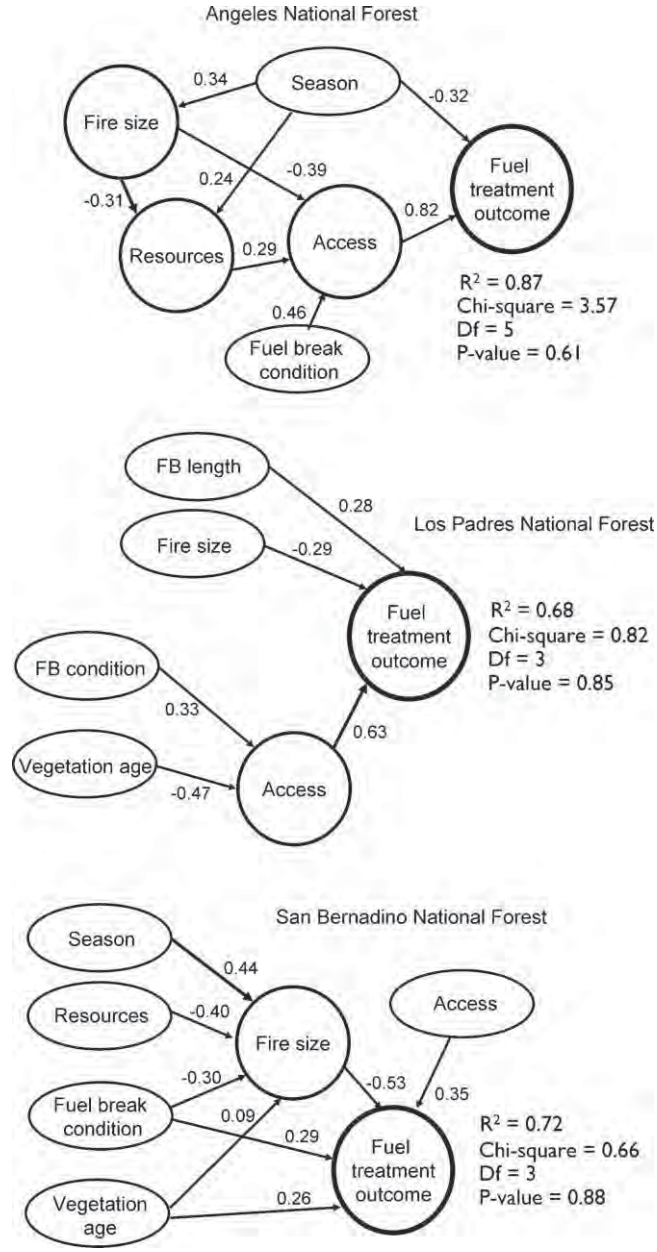

Fig. 4. Structural equation model of factors that directly and indirectly explain why fires stopped at fuel breaks in the Angeles, Los Padres, and San Bernardino National Forests. Solid arrows represent direction of effect, and coefficients shown along arrows are standardized values. Circles represent endogenous (or dependent) variables in the models. Due to insufficient number of fuel break/fire intersections the Cleveland National Forest was not included.

3.3. *Number of intersections: multiple regression and predictive mapping*

Of the variables we considered for explaining the number of fire and fuel break intersections in the forests, historic fire frequency was the only one that was retained in all three of the multiple regression models (Table 2). For all three forests, the number of intersections was strongly and positively related to the number of fires that had occurred since 1878 (date of the earliest fire in the database). Ignition density was also positively related to the number of intersections on the Angeles and Los Padres National

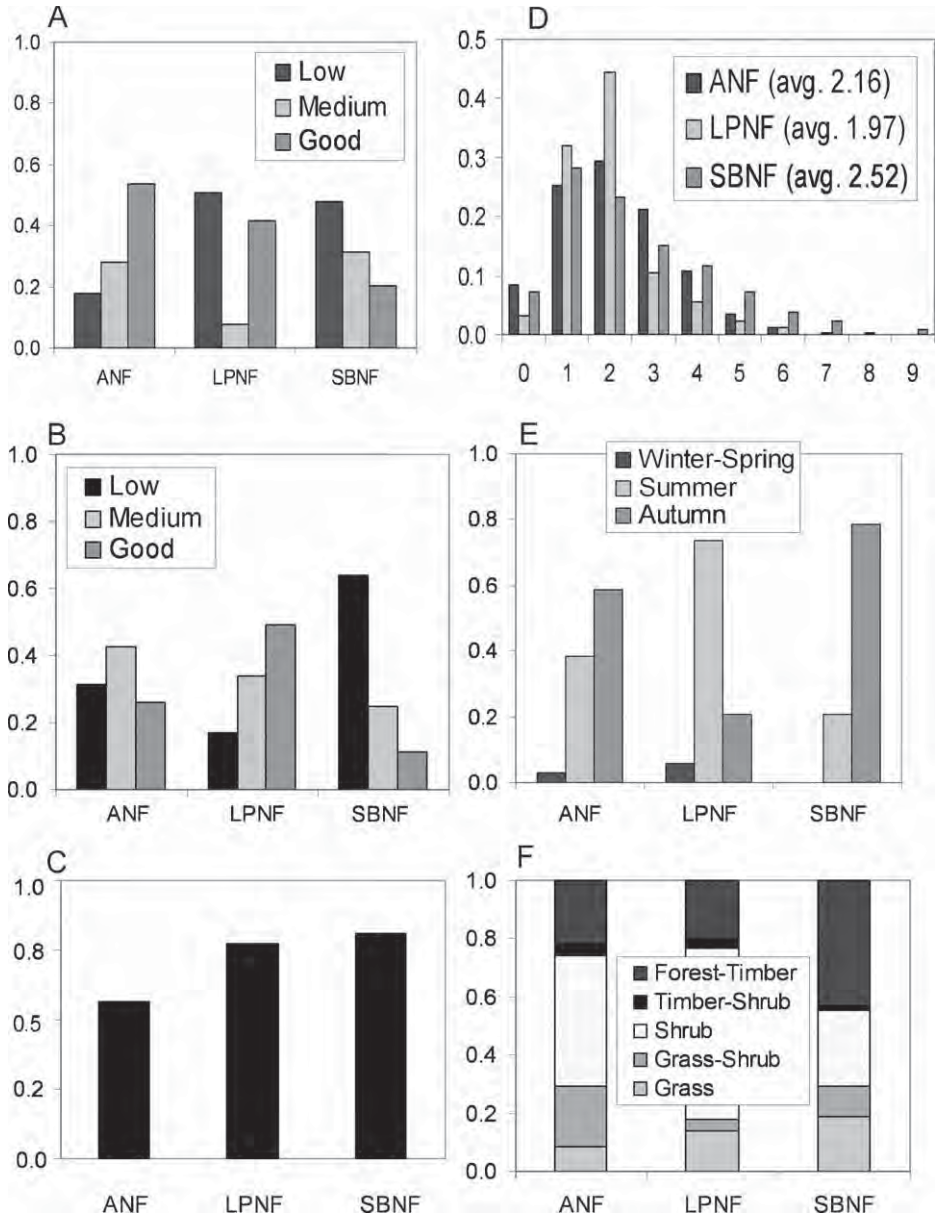

Fig. 5. Distribution of categorical variables for three national forests that were significant in any of the statistical models. The *y*-axis for all charts represents the proportion of observations within each forest. The charts represent (A) firefighting resources; (B) fuel break condition; C) Access to fuel break; (D) historic fire frequency (with the average for each forest indicated in the legend); (E) season when intersection occurred; (F) fuel type. ANF is Angeles National Forest, LPNF is Los Padres National Forest, and SBNF is San Bernardino National Forest.

Forests, but was not retained in the model for the San Bernardino National Forest. The Los Padres had the lowest average number of fires and lowest ignition density, whereas the San Bernardino had the highest fire frequency and ignition density (Figs. 5D and 6).

For both the Angeles and San Bernardino National Forests, the number of intersections was negatively related to elevation, which was slightly higher on average on the San Bernardino than the other forests (Fig. 6). The fuel model parameter was also significant in explaining model variation for only the Angeles and San Bernardino. A larger number of intersections occurred in forest and timber fuel models on the San Bernardino National Forest ("TU" or "TL", Scott and Burgan (2005)), whereas the shrub models ("SH", Scott and Burgan (2005)) were more influential in the Angeles (Fig. 5F). Three variables were retained in the multiple-regression model for the Los Padres that were not important in the other forests. On the Los Padres, fires were more likely to intersect fuel breaks when fuel breaks were in close proximity to trails, distance to roads was intermediate, and winter solar radiation was low. Both the average distance to trails and solar radiation were lower on the Los Padres than in the other two forests, but the average distance to roads was similar, with high variation in the three forests (Fig. 6).

The three map surfaces developed by applying the multiple-regression model formulas and coefficients to the GIS maps of the significant variables reflect a continuous probability distribution of where fires and fuel breaks are most likely to intersect (Fig. 6). The Pearson's correlation coefficients between the observed number of intersections and the number of intersections predicted by the model ranged between 0.59 and 0.74 (Table 3), and the root mean squared error ranged from 0.28 to 1.31 intersections. The correlations among the three maps generated by the differ-

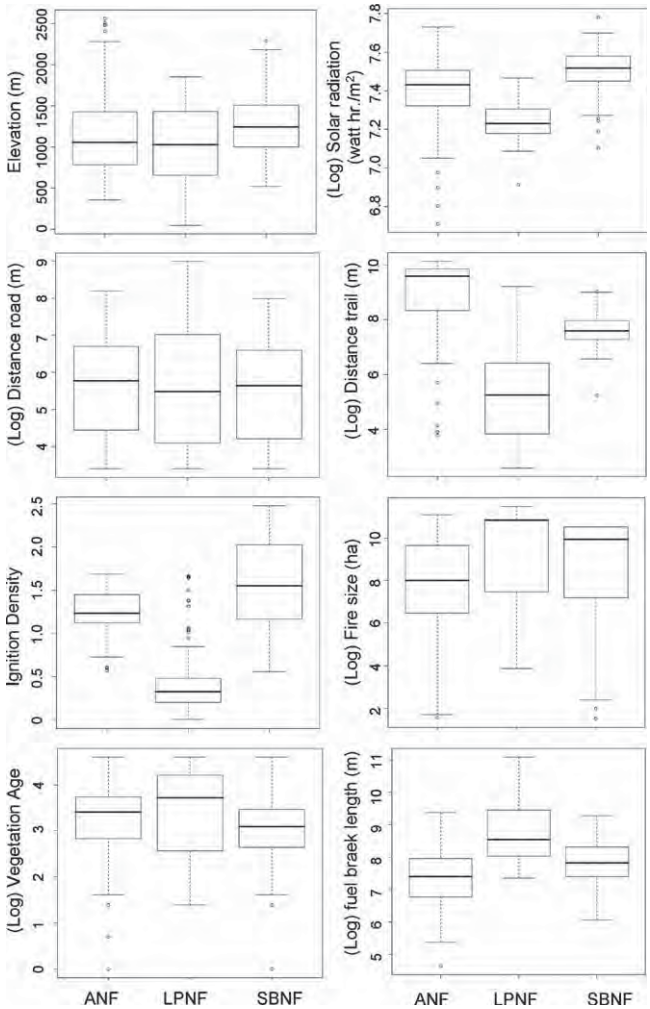

Fig. 6. Distribution of continuous variables for three national forests that were significant in any of the statistical models.

ent multiple-regression models were lower, particularly for the Los Padres model (correlation of 0.21 with the Angeles and 0.16 with the San Bernardino). The Angeles and San Bernardino maps, however, had a much stronger correlation (0.54) (Fig. 7).

4. Discussion

The four southern California national forests studied here all share several features in common; they are in rugged terrain, are dominated by non-forested ecosystems, and contain a substantial amount of wildland–urban interface. These national forests, however, differ in the proportions of vegetation types, biophysical characteristics, and the relative proportions of wildland–urban interface and intermix landscapes. These differences are part of the reason the significant factors explaining fuel break/fire outcomes and number of intersections were different among forests. Nevertheless, several factors were consistently important across all forests in explaining the number of intersections between fuel breaks and big fires and the role of fuel breaks in altering fire spread. These similarities support several general conclusions about the role of fuel breaks in controlling large fires in southern California.

One conclusion is that the primary role of fuel breaks in the region is to facilitate fire management activities. Two of the three fire management variables we considered (access and fuel break condition) were important in all three structural equation models (Fig. 4), and firefighter resources was important for two of the forests (Angeles and San Bernardino). Furthermore, while other important variables in the models (related to vegetation structure, fire size, and season) were not directly related to management, these variables often indirectly influence management, for example, by affecting access to treatment areas. Demonstrating the strength of these indirect effects is one of the benefits to structural equation modeling (Grace, 2006).

Firefighter access to fuel breaks was the most influential factor in fuel treatment outcome for the Los Padres and Angeles, and was also highly significant for the San Bernardino. The high level of significance for this variable supports the notion that, without firefighters present to control fires, fires will generally not stop at fuel breaks. Although three fires stopped on their own at the top of ridges on the San Bernardino, these fires constituted less than 1% of the cases. Only one fire stopped passively on the Los Padres, and none of the fires in our analysis stopped without firefighters on the Angeles. Despite this conclusion, it is important to point out that the fire perimeter database only includes fires greater than 10 ha; therefore, it is possible that some smaller fires do stop passively (i.e., without fire fighting actions) at fuel breaks. Many fire management personnel understand that fuel breaks are unlikely to passively stop most fires, particularly during extreme weather conditions, but the public, news media, and policy-makers may unrealistically expect otherwise. Our results show that such beliefs could lead to a false sense of security about the protective value of fuel breaks.

Most of the largest fire events in southern California occur during severe weather conditions in autumn, prior to winter rains, when dry, offshore Santa Ana winds can exceed 30 ms^{-1} (Miller and Shlegel, 2006; Moritz et al., 2010). Fighting fires during these weather conditions can be extremely dangerous, and during these wind events, multiple fires often break out simultaneously. These severe weather conditions likely explain why fire size was another variable that was highly significant in explaining fuel treatment outcome in all three forests. Discussions during the interviews confirmed that fires were more difficult to control, and likely to become large, under severe weather conditions. There are a number of reasons for this: the speed of such fires, which can cover 10,000 ha within a day or two, and thus the lack of time for accessing fuel breaks, the danger of aggressively attacking fires under such conditions, and firefighting resources spread too thin because of multiple fire fronts. Consistent with the effect of fire size, fire season was significant on the Angeles and San Bernardino because Santa Ana winds typically occur during the fall (and this was the season when fuel treatment/fire outcomes were poorest). The reason that season was not important for the Los Padres, but fire size was, is that Santa Ana winds are much less predictable there (Moritz et al., 2004, 2010). The Los Padres regularly experiences strong, hot wind downcanyon wind events known as "sundowners," typically in summer (Ryan, 1996), but these are not annual events as are Santa Ana winds. It is possible for severe-weather fire events to occur in any season, not just the fall, across the entire southern California region. This explains why fire size was important on all three forests.

In addition to fire management and fire weather (i.e., size and season), there was evidence that vegetation structure played an

Table 3
Pearson correlation coefficients among prediction maps for three national forests and among predicted and observed number of intersections within each forest. Root mean squared error (RMSE) is calculated between the observed and predicted number of intersections within each forest.

	Angeles	Los Padres	San Bernardino
Angeles map	1.00	0.21	0.54
Los Padres map	0.21	1.00	0.16
San Bernardino map	0.54	0.16	1.00
Observed *N* intersections	0.61	0.59	0.74
RMSE	1.31	0.76	0.28

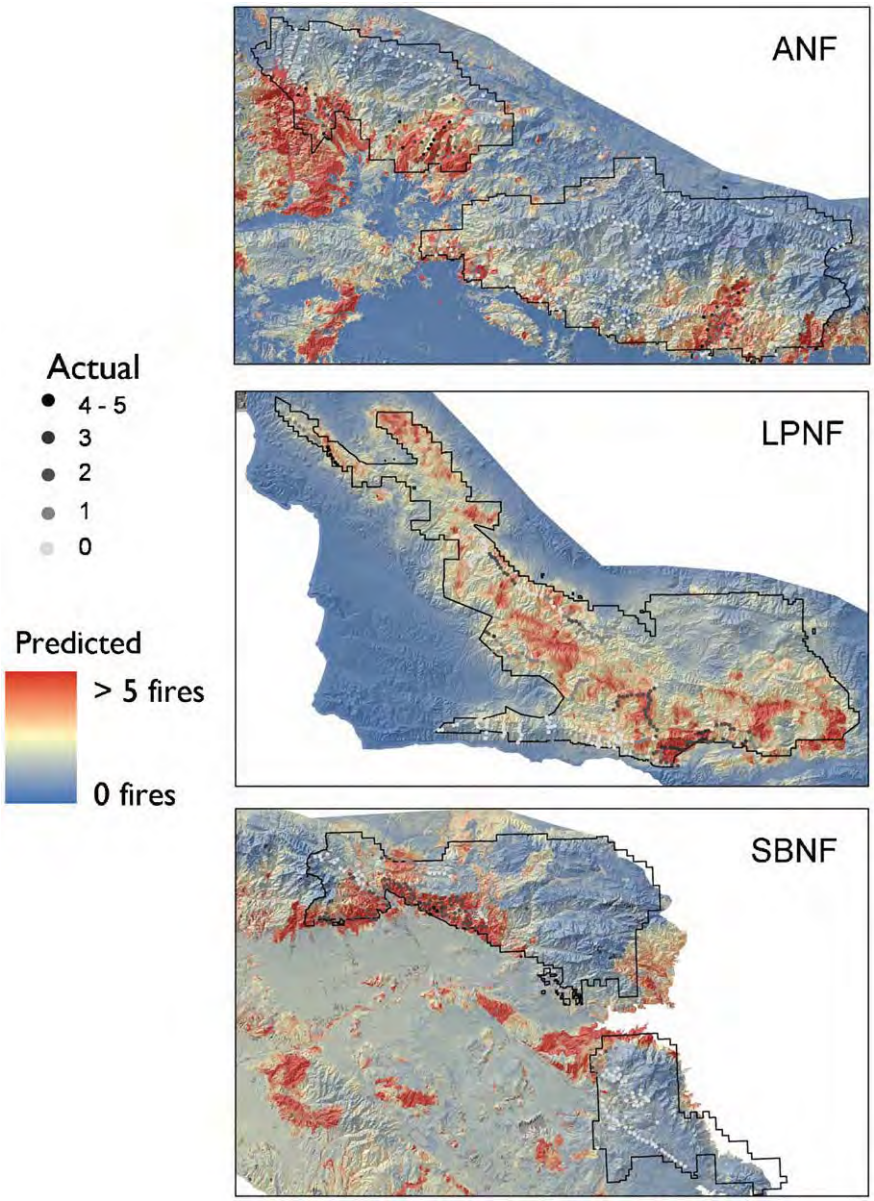

Fig. 7. Maps showing predicted distribution of areas most likely to intersect fuel breaks in the Angeles, Los Padres, and San Bernardino National Forests. The sample points along the fuel breaks also show the actual number of times fires intersected fuel breaks at those locations from 1980 to 2007.

important role in improving fuel break outcome in all three forests, and this was generally because well-maintained fuel breaks were much easier for firefighters to access in time to prepare the fuel break for suppression activities. Because young vegetation typically has a lower fuel load than old vegetation, one of the premises of conducting fuel manipulation is that young vegetation can directly slow or stop the spread of fire. However, in southern California shrublands, stand age and fuel loads play a limited role in stopping the spread of fire, particularly during extreme weather conditions, when fires often spread through or over very young age classes (Keeley and Zedler, 2009; Moritz, 1997; Moritz et al., 2004). Accordingly, while vegetation age was significant in the Los Padres, younger vegetation did not directly prevent fires from spreading, but helped facilitate firefighter access to fuel breaks. There are some parts of the Los Padres where, because of the lack of consistent Santa Ana influence, fuel age may play a role in controlling fire spread (Moritz, 1997). This particularly applies to the coastal area near the city of Santa Barbara. Regardless, the most significant relationship was between vegetation age and firefighter access.

Fuel break condition (i.e., how well it was maintained) played a similar role as vegetation age, and it was influential in all three forests. While the relationship was direct on the San Bernardino, better-maintained fuel breaks improved access to fuel breaks in the Los Padres and the Angeles, and thus, the relationship was indirect. Southern California chaparral forms a dense, continuous cover that is extremely difficult to maneuver in (Halsey, 2005), which likely explains why well-maintained fuel breaks improved the outcome.

As in the models for fuel break outcome, the models explaining the number of fire and fuel break intersections reflected regional landscape diversity and differences among the forests, while nevertheless suggesting several general conclusions. By far the most significant variable, and the only variable consistently significant for all forests, was historic fire frequency. This result is not surprising because areas that have burned most frequently in the past are likely to be most fire-prone in general. Ignition density patterns were also significant for two of the forests. Nevertheless, fire history was not the only factor explaining why fuel breaks intersect fires more in some places than in others. Fire and fuel break

intersections were a function of a combination of biophysical and human variables for all the forests, but the biophysical variables were generally more important than the human ones. This is consistent with other regional studies that have shown biophysical factors to be strongly related to patterns of fire occurrence and area burned, whereas human variables are most significant for explaining ignition patterns and fire frequency (Parisien and Moritz, 2009; Syphard et al., 2007, 2008).

The maps of predicted distribution of areas where fuel breaks are most likely to intersect with large fires did not correlate well among the forests, yet there was good correlation among observed and predicted number of intersections within the forests. In other words, the combination of factors that best predicted the number of intersections in one forest did not match well with the combination of factors that best predicted the intersections in the other forests. These differences reflect how the environmental controls of fire regimes vary from region to region, even within a single ecoregion. Therefore, a "one size fits all" management approach would be inappropriate if the objective were to map likely areas for fires and fuel treatments to intersect. While developing a model for one region and applying it to a different region may be inappropriate, the modeling methodology adopted here could easily be applied anywhere. These types of maps could be part of a manager's toolset in helping to identify areas where new fuel breaks could be constructed or where current fuel breaks should be maintained.

We cannot directly attribute differences in the influential variables of our models to differences among the forests because we only statistically analyzed three national forests. Nevertheless, the differences among the national forests do provide a perspective on the variability of the region, despite the fact that it all falls within the same ecoregion. This is striking considering that southern California has a distinctive fire regime, owing to the defining characteristics of the region's Mediterranean-type climate. Because of the cool, wet winters and hot, dry summers, and the specific properties of chaparral, this vegetation is particularly flammable for a substantial portion of the year and burns in large, stand-replacing, high-intensity fires (Pyne et al., 1996). The region's fire regime and fire management issues are typically most starkly contrasted against those in forested regions (Keeley et al., 2009). While it has been recognized that many fire management practices in forested regions are inappropriate for southern California shrublands (Halsey, 2005; Keeley and Fotheringham, 2006), this study shows how certain aspects of fire management may need to be individually tailored at even finer scales, dependent on terrain, proximity to urban environments, regional weather patterns, and fuel type composition.

In southern California, fuel treatments can lead to ecological degradation because they often involve complete removal of vegetation, facilitate the spread of exotic species, and may thus indirectly contribute to increased fire frequency in a region where recurrent fire already threatens the native shrublands (Merriam et al., 2006, 2007). These resource costs should be considered relative to the benefits of protecting communities, and these trade-offs should be considered when constructing new fuel breaks in the region. This is in contrast to forested regions, where the objective of protecting communities is often coupled with the objective of reshaping the age structure and composition of forests to resemble historic conditions (Reinhardt et al., 2008). In these forests, fuel breaks and resource benefits generally are mutually beneficial. Regardless of the region, mitigating fire risk to communities is a priority for federal land managers, yet most fuel treatments are not placed within the wildland–urban interface where they may have the greatest potential for protecting homes. Across the western United States, only 3% of the area treated from 2004 to 2008 was located in this interface (Schoennagel et al., 2009).

Many new fuel breaks are currently being constructed in southern California. In fact, the most likely reason there were not enough fire and fuel break intersections to complete a statistical analysis in the Cleveland National Forest is because a large proportion of the fuel treatments have been recently constructed. Despite the large amount of new fuel break construction, the results of this study show that many fires never actually intersect fuel breaks, and large areas of fuel breaks never intersect fire. Also, the forests that had the highest density and area of fuel breaks did not have the highest overall effectiveness of fuel breaks, suggesting that treating more area alone does not necessarily increase the safety of a region. It may be more effective to have fewer fuel breaks in strategically placed locations than to have greater area of fuel breaks overall, at least in terms of protecting communities. The results from all three forests show that fuel breaks played an important role in controlling large fires primarily where they provided access for firefighting activities. Strategically locating fewer fuel breaks could also reduce the potential for resource costs.

Discussion in the interviews revealed that many strategic decisions do go into placing fuel breaks. While these decisions are often based on years of fire management experience, quantitative and spatially explicit analyses could potentially be helpful in refining these strategic decisions. For example, maps like the ones generated here, showing where fuel treatments are mostly likely to intersect fires, could be combined with further spatial analyses of where access is best and where communities need the most protection. In particular, this study strongly supports the notion of constructing fuel breaks along the wildland–urban interface where firefighters will have better access to the fuel breaks, and where the fuel breaks will provide an immediate line of defense adjacent to homes that are at risk. The case studies from all four national forests demonstrate that fuel breaks will not stop fires without firefighter presence. Therefore, constructing fuel breaks in remote, backcountry locations will do little to save homes during a wildfire because most firefighters will be needed to protect the wildland–urban interface, and fires will not be stopped by those fuel breaks that are located farther away. Finally, because access to fuel breaks was consistently improved when vegetation structure was favorable, this study suggests that maintaining fuel breaks in strategic locations may be just as important as constructing new fuel breaks.

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Factors affecting fuel break effectiveness in the control of large fires on the Los Padres National Forest, California

Alexandra D. Syphard[A,D], *Jon E. Keeley*[B,C] *and Teresa J. Brennan*[B]

[A]Conservation Biology Institute, 10423 Sierra Vista Avenue, La Mesa, CA 91941, USA.
[B]US Geological Survey, Western Ecological Research Center, Sequoia–Kings Canyon Field Station, Three Rivers, CA 93271, USA.
[C]Department of Ecology and Evolutionary Biology, University of California, Los Angeles, CA 90095-1606, USA.
[D]Corresponding author. Email: asyphard@consbio.org

Abstract. As wildfires have increased in frequency and extent, so have the number of homes developed in the wildland–urban interface. In California, the predominant approach to mitigating fire risk is construction of fuel breaks, but there has been little empirical study of their role in controlling large fires. We constructed a spatial database of fuel breaks on the Los Padres National Forest in southern California to better understand characteristics of fuel breaks that affect the behaviour of large fires and to map where fires and fuel breaks most commonly intersect. We evaluated whether fires stopped or crossed over fuel breaks over a 28-year period and compared the outcomes with physical characteristics of the sites, weather and firefighting activities during the fire event. Many fuel breaks never intersected fires, but others intersected several, primarily in historically fire-prone areas. Fires stopped at fuel breaks 46% of the time, almost invariably owing to fire suppression activities. Firefighter access to treatments, smaller fires and longer fuel breaks were significant direct influences, and younger vegetation and fuel break maintenance indirectly improved the outcome by facilitating firefighter access. This study illustrates the importance of strategic location of fuel breaks because they have been most effective where they provided access for firefighting activities.

Additional keywords: chaparral, firefighter, mapping, pre-fire fuel treatment, southern California, strategic location, structural equation model, suppression, wildland–urban interface.

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Introduction

In recent decades, wildfire frequency, extent or severity have increased across much of the western United States (Stephens 2005; Westerling *et al*. 2006; Miller *et al*. 2009), as well as other regions around the world (e.g. Pausas and Vallejo 1999; Montenegro *et al*. 2004). Concurrently, the number of homes built in the wildland–urban interface (WUI, where development meets or intermixes with wildland vegetation), and the areal extent of the WUI have grown dramatically – and are expected to continue growing for decades to come (Radeloff *et al*. 2005; Theobald and Romme 2007). The social and financial cost of so many homes located in fire-prone areas has been high. From 2002 to 2006 in the western US, US$6.3 billion was spent fighting fires, 92 lives were lost and more than 10 000 homes were destroyed (Gude *et al*. 2008). Considering the enormity of these effects, there is tremendous pressure to develop wildland fire-management practices to reduce urban losses.

Although reducing wildfire losses ultimately will require a combination of urban and wildland changes, historically the main focus has largely centred on wildland fuel reduction, often in the form of mechanical fuel treatments (Dellasala *et al*. 2004). Between 2001 and 2006, federal land management agencies in the western United States spent US$2.7 billion for fuel treatments (Schoennagel *et al*. 2009). Although the objective for constructing fuel treatments is generally to reduce the severity and spread of wildfires, specific expectations regarding how fuel treatments are supposed to function tend to vary among different stakeholders (e.g. public, special-interest groups, policy-makers or management agencies (Reinhardt *et al*. 2008). The typical objective of fuel treatments in many western US forests is to change fire behaviour, reduce the severity of fire effects and restore forest structure to conditions that would safely support a natural fire regime of frequent, low-intensity fires (Reinhardt *et al*. 2008). In urbanised areas, treatments are instead intended to prevent fire from spreading into development (Raab and Martin 2001; Radeloff *et al*. 2005), but there may be unrealistic expectations that these treatments can 'fire-proof' those areas (Reinhardt *et al*. 2008; Keeley *et al*. 2009*a*).

Along with differing expectations, the effectiveness or appropriateness of treatments are also likely to vary according to regional differences in vegetation type and structure, natural fire regime, weather conditions and local topography

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(Stratton 2004). The ecological implications of fuel treatments, and ecological effects of altered fire regimes, are also likely to vary from region to region, but ecological considerations are rarely incorporated into current forest laws and policies (Noss *et al*. 2006). Although fuel treatments and resource benefits are likely to be compatible in many forest types (Schwilk *et al*. 2009), treatments potentially create negative ecological effects in non-forested communities such as chaparral shrublands in southern California (Keeley *et al*. 2009*b*). Unlike forests, in which mechanical fuel treatments typically remove only surface fuel (preserving larger, older trees), fuel break construction in chaparral typically involves complete removal of vegetation, chemical herbicides and permanent conversion of native shrublands to weedy herbaceous associations (Wakimoto 1977). The range of ecological effects includes exotic species expansion, erosion and watershed issues, and fragmentation of important habitat for threatened and endangered species.

Despite the potential ecological effects of fuel treatments in southern California shrublands, the pressure to mitigate fire risk is enormous. In this region, almost 1 million ha of land has burned since 2000, much of which was consumed in fires larger than 50 000 ha. In the fires of 2003 and 2007, ~5000 homes were destroyed. The population of the region is growing rapidly, and much of the housing development is distributed in scattered patterns that create thousands of miles of edge between houses and fire-prone vegetation (Pincetl *et al*. 2008). There are consequently complex trade-offs among the costs and benefits related to fuel management in southern California, as well as other fire-prone regions dominated by extensive development: creating fuel breaks is costly financially and may result in substantial ecological effects, but fuel breaks may play an important role in protecting communities from catastrophic losses.

Adding to the dilemma over costs and benefits in implementing fuel treatments is the uncertainty over the conditions under which fuel treatments are effective at mitigating fire risks. For example, the behaviour of chaparral fires under moderate weather conditions is very different than the behaviour during Santa Ana conditions, and the role of fuel breaks may vary accordingly (Keeley 2005; Keeley *et al*. 2009*a*). Although many managers recognise that the primary role of fuel breaks in developed areas and the WUI is to provide an anchor point and a safe place for firefighters to control and extinguish fires (Conard and Weise 1998; Witter and Taylor 2005), sometimes too much faith is placed in the ability of treatments to passively stop the spread of fire, which may be unlikely under severe weather conditions. A quantitative analysis of the role of fuel breaks may therefore provide critical insights that can inform peoples' expectations and can help to construct fuel breaks more efficiently.

Most research on fuel-treatment effectiveness has been conducted with simulation models at relatively small scales (e.g. Miller and Urban 2000; Finney *et al*. 2007; Schmidt *et al*. 2008), and there is some empirical research documenting how fires have responded to individual fuel treatments (e.g. Schoennagel *et al*. 2004; Raymond and Peterson 2005; Safford *et al*. 2009). However, there are insufficient examples to form general conclusions, particularly at a landscape scale.

Another consideration is that, if fuel breaks are constructed in locations where fires rarely or never encounter them, then those treatments will have no opportunity to play any role. In other words, two conditions need to be satisfied before a fuel treatment can function effectively: (1) the fire needs to actually intercept the treatment, and (2) the treatment must perform according to its expected role.

Considering these two conditions, and to better understand what role fuel treatments have played in reducing the effects of large fires, we analysed the relationships among fires and fuel breaks in the Los Padres National Forest in southern California over a period of 28 years to answer these research questions:

1. What proportion of treatments intersected fires, and can we explain and predict why some treatments encounter more fires than others?
2. What is the role of fuel breaks in controlling large fires, and what factors influence this role?

We expected this study to provide deeper understanding of the relative importance of factors influencing fuel-treatment success in southern California and to provide guidance on how to develop more efficient treatment strategies.

Methods

Study area

Our study area included all lands (~590 000 ha) within the Main Division (central ranger districts) of the Los Padres National Forest in southern California. The climate is Mediterranean, with cool wet winters and hot dry summers. The landscape is dominated by chaparral shrublands, which are highly flammable owing to dense community structure and the annual 6 months of drought every summer and autumn (Radtke *et al*. 1982; Conard and Regelbrugge 1994). Broad swaths of chaparral are often broken up by patches of coastal sage scrub, riparian woodlands, oak woodlands, grassland and coniferous forest. The region is topographically complex and rugged, with slopes often exceeding 35°, and much of the interior of the Los Padres National Forest study area is relatively inaccessible.

Adjacent to this rugged terrain are several urban areas, such as Santa Barbara and Ojai, and housing developments border much of the forest boundary, increasing the potential for wildfire to threaten lives and property. Slightly more than 10% of the land inside the forest boundary is occupied by privately owned inholdings (V. Radeloff, unpubl. data), and low-density housing exists within much of the forest, particularly near the boundary. Thus, the primary objective of firefighting and constructing fuel breaks is to stop fires and to prevent them from threatening structures. Humans also cause the majority of fire ignitions in the region (Moritz 1997).

Fuel treatment and fire data

The Los Padres National Forest provided written, pictorial and oral data on historic fuel treatments. Many recent fuel-treatment locations were provided digitally, but we also digitised older fuel breaks from hard-copy maps. To identify case studies for follow-up interviews and subsequent analysis, and to analyse the intersections among fuel treatments and fires, we used a Geographic Information System (GIS) to overlay the fuel treatment data with fire perimeter polygons, compiled by the California Department of Forestry-Fire and Resource Assessment Program (CALFIRE). The fire perimeter data only

represent the largest fires (with a minimum mapping unit of 4.04 ha (10 acres)), but they serve as the most comprehensive source of fire data in the state. The largest fires also account for the majority of area burned.

Quantifying number of intersections

Through GIS overlay analysis, we counted the number of times fires crossed fuel breaks from 1980 to 2007. We restricted our analysis to fires that occurred after 1980 owing to greater uncertainty in accuracy of GIS data before 1980 and because of the limited availability of firefighters and managers familiar with fires before 1980, which was critical for personal interviews. Some sections of fuel breaks intersected fires more frequently than other sections, so we stratified each fuel break spatially and classified it according to the number of intersections (ranging from 0 to 4). From this spatially stratified data layer, we randomly selected point samples (244 points; see below) to extract environmental data to relate to the number of intersections that occurred at those points. To ensure that all fuel breaks had an equal chance of intersecting fire, for this part of the analysis, we only evaluated those fuel breaks that had been constructed before 1980 and were intersected by fire that occurred in the period 1980–2007.

Based on a previous analysis of fire frequency (Syphard *et al*. 2008), we suspected that fire intersections and our predictor variables were likely to be spatially autocorrelated, which would violate the assumption of independence in regression models and potentially inflate model significance (Fortin *et al*. 1989; Haining 1990). The influence of spatial autocorrelation can be avoided by using a minimum distance to separate observations that is larger than the range of spatial autocorrelation (Miller *et al*. 2007). Therefore, after we estimated initial regressions models (see below), we plotted semivariograms of the models' deviance residuals. We determined that spatial autocorrelation was present when samples were within 1 km of each other, so we subsampled our data to avoid observations within that lag distance, which resulted in a sample size of 244 observations.

Selecting fuel break case studies

Through GIS overlay analysis, we identified all events in which a fire occurred within 100 m of a fuel break, to account for any spatial uncertainty in the boundaries of either the fires or the fuel breaks. For this analysis, we considered fuel breaks constructed at any date, but only fires later than the date of fuel break construction were included. After identifying all potential intersections between fires and fuel breaks, we conducted preliminary analyses to identify whether the fire appeared to have stopped at the fuel break or whether it spread across it. We then arranged personal interviews with fire personnel having first-hand knowledge of the incident.

Explanatory variables

To understand and to predict why fires intersect some sections of fuel breaks more than others, we explored the potential influence of several human and biophysical variables known to be associated with the spatial distribution of fire at a landscape scale (Syphard *et al*. 2008). We also considered the potential for historic fire regime (fire frequency and ignition density) to explain the number of intersections because we expected the fire history to reflect how some areas in a landscape are more fire-prone than others. Because the data for the number of fuel break intersections were collected from across the entire time period in the study (1980–2007), we did not consider variables related to specific points in time for that analysis. However, to identify the primary factors that affect the role of fuel breaks, we additionally considered variables related to fire events, including characteristics of the fires, fuel breaks, suppression activities and vegetation age, although we did not consider historic fire regime.

For the environmental and fire regime variables, we used a GIS to extract data values to relate to the dependent variables. For the analysis of number of intersections, we extracted data from the locations of the random sample points. For the case studies where fires intersected fuel breaks, we extracted data from the portion of the fuel break where the fire intersected and averaged the values for that area. By constraining the area of analysis, we ensured that we were only considering the potential local influence of those variables because some fuel breaks are quite long and may span large areas.

Human and biophysical environmental variables

Because the majority of fires in California are started by humans, the spatial distribution of fire tends to be strongly related to the distribution of human infrastructure (Syphard *et al*. 2007, 2008). Therefore, our explanatory human variables included distance to development, roads and trails (as in Syphard *et al*. 2008). We expected a larger number of intersections to occur in close proximity to human infrastructure, and we expected fires to stop more frequently near human infrastructure because firefighters would be able to access those areas more quickly. We used the Development Footprint data layer from CALFIRE (http://frap.cdf.ca.gov/data/frapgisdata/select.asp, accessed 13 July 2011) that delineates developed lands from 2000 Census block data, 2000 land ownership data, 1990s US Geological Survey National Land Cover Data (NLCD), and 2000 Census Urbanised Area data at 30-m resolution. The road data came from the 2000 US Topologically Integrated Geographic Encoding and Referencing system TIGER/Line files. The trail data came from the US Forest Service online GIS clearinghouse (http://www.fs.fed.us/r5/rsl/clearinghouse/gis-download.shtml, accessed 13 July 2011).

Independently of human influence, a region's fire regime and the distribution of fire patterns are influenced by biophysical factors, or the fire environment (Pyne *et al*. 1996). Based on the biophysical variables that significantly influenced fire patterns in another southern California landscape (Syphard *et al*. 2008), we explored the potential influence of elevation, slope gradient, solar radiation, fuel model and vegetation age. We also considered several climate variables, but they were strongly correlated with elevation, so we removed them from the analysis. Because these biophysical variables may affect fire spread rate, fuel moisture, flammability of fuels and fire intensity both directly and indirectly (Whelan 1995), we expected that their distribution and spatial variability would influence where fires would most frequently intersect fuel breaks. We expected them to also potentially influence the role of fuel breaks in constraining fire because of their influence on fire spread rates, which could inhibit firefighting efforts.

We acquired elevation data from the 30-m US Geological Survey Digital Elevation Model, and used it to derive slope gradients and to develop grids of terrain-distributed solar radiation, which mediates temperature and available fuel moisture (Dubayah and Rich 1995). Solar radiation tools in the Spatial Analyst extension of *ArcGIS 9.x* were used to calculate daily insolation for winter solstice with site latitude of 33°N, sky size of 200 cells per side and 0.2 clear sky irradiance, the fraction of global normal radiation flux that is diffuse. This has been shown to be a significant predictor of regional plant species distributions (Syphard and Franklin 2009).

Vegetation and fuel characteristics are often classified into fuel models that exemplify relatively uniform fire behaviour and rates of spread. We obtained spatial fuel model data from statewide maps developed by the US Forest Service (N. Amboy, pers. comm. January 2010) at 30-m resolution to evaluate whether number of intersections would vary according to fuel models. We were unable to evaluate fuel model in the statistical analysis of fuel break outcome because there were several fuel model types with only one observation in the data.

We also evaluated whether or not fuel break outcome would vary based on the age of surrounding vegetation at the time of fire. Because the majority of fires are stand-replacing in California shrublands, we used fire-history maps to determine the age of the vegetation by subtracting the time of last fire from the year of every fire event.

Fire history

Because some parts of a landscape are more fire-prone than others, we expected the number of intersections among fires and fuel breaks to be positively associated with those areas that have historically burned most frequently. To associate number of intersections with historic fire regime, we converted the fire perimeter polygon data layer into a continuous grid surface that reflected the number of fires that occurred in each cell throughout the fire history (1878–2007). We included the full history of fires for this variable because it provided a larger sample of fires to quantify which parts of the landscape tend to burn more frequently than others.

In addition to the fire perimeter database, we also used a database of ignitions (that occurred from 1970 to 2007) to evaluate whether number of intersections was positively related to areas of high ignition density. The ignition data were compiled from original fire reports on file at the Los Padres National Forest and included 1380 ignitions (71% caused by humans). To create the ignition-density grid, we used a point density function in a GIS that calculated, across the entire landscape, the relative magnitude of ignition occurrences per unit area based on the number ignition points that fell within a specified neighbourhood (3 km) around each cell.

Fire events

We calculated the size of every fire that intersected a fuel break using a GIS, and the month of the fire was listed in the fire perimeter database. To reduce the degrees of freedom in the analysis, we reclassified the fire months into spring–summer (April through July) *v.* fall (autumn)–winter (September–December). No fires occurred in the month of August in our dataset.

We explored two sets of weather data in relation to the fires that intersected fuel breaks. One was from the global surface summary of day product from the National Oceanic and Atmospheric Administration (NOAA) National Climatic Data Center (NCDC) (ftp://ftp.ncdc.noaa.gov/pub/data/gsod). There were seven NOAA weather stations within the proximity of the study area, and the available data included the mean, maximum and minimum daily temperature, mean and maximum wind speed, and daily precipitation. For some historic fires that burned over the course of many days, we had no way of knowing the date when the fire intersected the fuel break. Therefore, we downloaded and explored data for all dates in which the case-study fires occurred. We calculated the mean, maximum and minimum values, as well as the range and standard deviation, of weather data during the duration of the fire to relate them to fuel break outcome.

In addition to the NOAA data, we explored a data product developed by John Abatzoglou and colleagues at the Desert Research Institute Western Regional Climate Center in Reno, NV. The development of this product involved a hierarchical process in which 32-km North American Regional Reanalysis data, including relative humidity, temperature and wind speed parameters (http://www.emc.ncep.noaa.gov/mmb/rreanl/) were bias-corrected to fine-scale 4-km PRISM (Parameter-elevation Regressions on Independent Slopes Model) climate data, monthly temperature and precipitation (http://www.prism.oregonstate.edu/) and further corrected using Remote Automated Weather (RAWS) stations. From the 4-km continuous grids of weather data, we extracted minimum and maximum daily relative humidity, temperature, wind speed and direction from within the perimeters of case-study fires during the range of dates that they occurred. As with the NOAA data, we explored the potential influence of mean, maximum and minimum values, as well as the range and standard deviation, of weather data during the duration of the fire to relate them to fuel break outcome.

Characteristics of fuel breaks

We used GIS to calculate the length of the fuel breaks, and we included the entire fuel break length as our explanatory variable. The fuel break width was included in the attributes of the files that the forest service crews provided and ranged from 6 to 183 m (20–600 feet). A few of the fuel break widths were presented as ranges (e.g. 6–12 m or 91–180 m), so we used the mean of the range for the width value of those fuel breaks.

Because it was difficult to determine the condition of the fuel break (i.e. the amount of vegetation regrowth) at the moment of intersection through maintenance records or through GIS mapping, we asked fire personnel to indicate the condition of the fuel break on a scale from one to three (poor to excellent). All personnel based their ranking on the same criteria. A ranking of one meant that the fuel break was barely discernable from the surrounding vegetation; a ranking of two meant that the fuel break was apparent, but that vegetation was starting to regrow; and a ranking of three meant that the fuel break was in excellent condition with no vegetation regrowth or was primarily grass.

Suppression activities and other fire event information

Data on suppression activities were obtained during personal interviews based on a questionnaire to determine whether there

was access to the fuel break (yes or no) and the availability of firefighting resources (manpower and equipment) on a scale from one to three. For firefighting resources, a ranking of one meant that the firefighters did not have the equipment or manpower available to fight the fire; a ranking of two meant that equipment and manpower were available but not completely sufficient for properly fighting the fire; a ranking of three meant that the firefighters had all the equipment and manpower they needed to fight the fire. We also asked the firefighters to specify the vegetation type at the time of fire, but this variable was highly correlated with condition of fuel break, so we did not include that variable in the statistical analysis. In addition to asking specific interview questions, we documented any additional notes or insights about the fire events.

Statistical analysis

Number of intersections

To evaluate the influence of the explanatory variables on number of fuel break–fire intersections, we developed Poisson regression models because they are appropriate for count data (Agresti 1996). To explore the effects of the explanatory variables independently of their interactions with other variables, we first developed simple regression models. We evaluated linear and quadratic relationships for all the continuous variables, and then ranked variable importance based on the deviance explained in the simple models. In generalised linear models (which include Poisson and logistic regression), models are optimised through deviance reduction, and the deviance explained (D^2) is the equivalent to the R^2 in ordinary least-square models (Guisan and Zimmermann 2000). We used the rankings to establish the order to enter variables in a multiple regression, and we considered those variables that were significant at $P \leq 0.15$ and that were not correlated with other variables (bivariate correlation ≥ 0.3). Because distance to development was correlated with ignition density ($R = -0.4$) and distance to road ($R = 0.37$), we removed it from the multiple-regression analysis.

For the multiple-regression modelling, we were primarily interested in selecting the best model for predicting and mapping the number of intersections. Therefore, we identified several plausible multiple-regression models and selected the best-fit model as the one that explained the highest percentage deviance explained with the lowest Akaike information criterion (AIC) (Quinn and Keough 2002). We checked our Poisson model to ensure that overdispersion did not exist and that our residual deviance was equal to our residual degrees of freedom.

To evaluate the multiple-regression model, we predicted the number of intersections for the random sample points and calculated the Pearson's correlation coefficient between the actual number of intersections and the predicted number of intersections. We also calculated the root mean square error (RMSE) to quantify the discrepancy between observed and predicted values. All modelling was carried out in the R 2.7.0 statistical programming environment (R Development Core Team 2004).

We converted the multiple-regression model into a predictive map surface by applying the formula from model to the entire landscape using the regression coefficients and the GIS layers for the significant explanatory variables. For Poisson regression, the formula is:

$$n = \exp(B_0 + B_1 \times X_1 + B_2 \times X_2 + \ldots + B_k \times X_k)$$

where n is the number of fire–fuel break intersections, B_0 is a constant, and B_i are coefficients of the explanatory variables.

Fuel-treatment outcome

The response variable for fuel-treatment outcome was binary and indicated whether the fuel treatment constrained the fire or not. Therefore, instead of using Poisson regression, we estimated simple and multiple logistic regression models using the same approach as for number of intersections, although we did not create a predictive map. To evaluate the performance of the logistic multiple-regression model, we performed a leave-one-out cross-validation, which iteratively leaves one observation out of the model, fits the model and then calculates the predicted probability of the observation for every observation in the sample. Based on the cross-validated predictions, we calculated the area under the curve (AUC) for a receiver operating characteristic (ROC) plot (Hanley and McNeil 1982). The AUC ranges from 0.5 to 1, and, in this case, indicates the overall probability that, for a randomly selected set of binary observations (one in which fire stopped at a fuel break and the other in which fire did not stop), the model correctly identifies them.

After exploring the relationships among the explanatory variables through regression modelling and correlation analysis, we developed a structural equation model (SEM) to confirm hypotheses about the factors and interactions that were significant in explaining fuel-treatment outcome. We developed our hypotheses based on the regression analysis as well an exploration of correlations among all the variables. SEM has advantages over multiple-regression modelling because it can test whether our hypotheses are consistent with our data and can also test for indirect interactions (Grace and Pugesek 1998). Rather than a predictive modelling approach, SEM serves as a framework for interpreting relationships among a network of interrelated factors (Grace *et al*. 2010). We supplemented the multiple-regression analysis with SEM because our objective was to better understand the interactions among factors influencing the role of fuel breaks in controlling fires.

Because we were modelling categorical outcomes, we used the weighted least-squares with mean and variance adjustment (WLSMV) estimator, and evaluated model fit using chi-square and associated P values as well as other fit indices, including RMSE of approximation and weighted root mean square residual (Hooper *et al*. 2008). Owing to our limited dataset, we included paths that were significant at $P \leq 0.15$; however, we compared alternative models by removing one path at a time to ensure that, if a path were removed, the chi-square did not increase more than 3.84 points (the single degree-of-freedom test) (J. B. Grace, pers. comm.). We performed the structural equation modelling with *Mplus version 5.1*.

Results

There were ~550 km of mapped fuel breaks in the study area (Fig. 1), including fuel break backbones along ridgelines as well

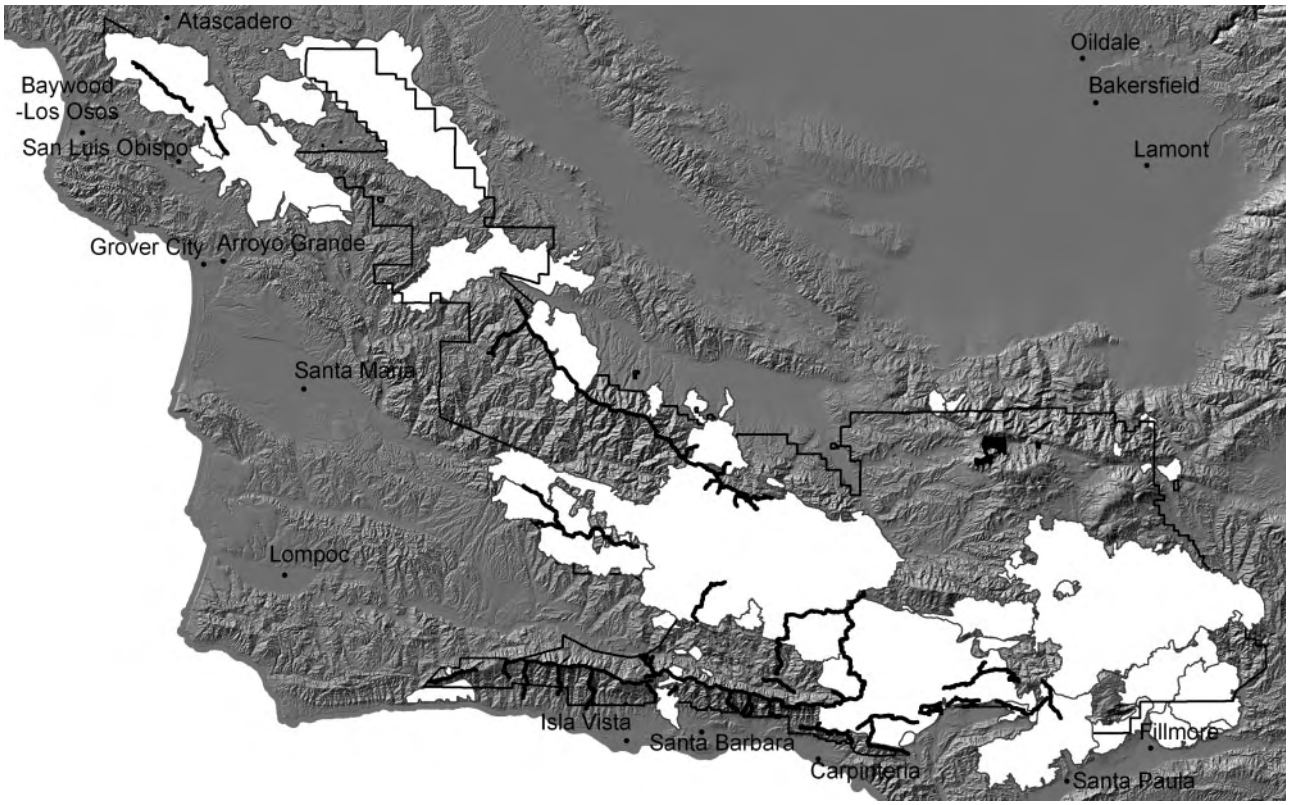

Fig. 1. Map showing location of fuel breaks (thick black lines) and fires (in white) that occurred between 1980 and 2007 in the Los Padres National Forest, CA. The thinner black line shows the study area.

as laterals. Most were constructed before 1980, but several were created within the last decade. Often, a combination of methods were used to create and maintain the fuel breaks, including dozers, discs, herbicide or spot herbicide, hand pile and burn, hand pile and chip, or mastication. These methods often varied along the length of individual fuel breaks, and maintenance methods changed over time. Although one fuel break (~28 km) was shaded, the rest of the fuel breaks were constructed similarly, as linear features on the landscape in which shrublands were converted primarily to grasslands.

From 1980 to 2007, 95 fires intersected the study area, with sizes ranging from 5 to almost 100 000 ha (the Zaca fire of 2007) (Fig. 1). Of these, 20 fires (21%) intersected at least one fuel break, and 8 of these 20 fires (40%) intersected more than one fuel break. Some portions of the fuel breaks never intersected any fires, but during the 28-year study period, some portions of fuel breaks intersected up to four fires (Fig. 2).

The GIS analysis identified 74 unique events in which fires intersected fuel breaks, but during personal interviews, 21 of those intersections were removed from the analysis owing to one of the following reasons: in one case, two fires were unnamed and nobody remembered them; in another, several fires did not spread into the fuel break, but rather spread away from it or parallel to it; and lastly, one of the fires in the database apparently never occurred. We did not consider fires spreading away from or parallel to the fuel break because the firefighters claimed in the interviews that the fuel break in those cases would have been irrelevant in the control of the fires. Therefore, the final number of fire and fuel break intersections was 53.

For 23 of the 53 events (46%), the fire was effectively constrained by the fuel breaks, and for 30 (54%) of the events, the fire spread across the fuel break. In all but one of the events in which fires stopped at the fuel breaks, firefighters had access to the treatment for suppression activities. For the events in which fires spread across fuel breaks, there were 11 occasions (37%) in which fire crews did not have access to the treatment and 19 events (63%) in which crews had access to the treatment, but the fire spread across it.

Results from the interviews with the firefighters revealed that the primary reasons that fires crossed fuel breaks were: (1) scarce resources were available if the fire was large or if other fires were burning simultaneously; (2) winds shifted during the event, making fire behaviour unpredictable; (3) the fuel break had not been maintained and was difficult to manoeuvre around; or (4) fire crews did not put suppression resources on the treatment.

During the interviews, the fire crews also described how they frequently ran dozers down the fuel breaks before the fires reached them. In wilderness areas, dozers are prohibited, so crews instead used hand-lines or hose-lay in preparation for the fire. If the fuel breaks were already type-converted to grass, the crews did not dozer them, but dropped retardant and water. If safe, firefighters waited for the fire with a hose-lay and hand-line to bare dirt. In many cases, substantial areas of the recorded fires

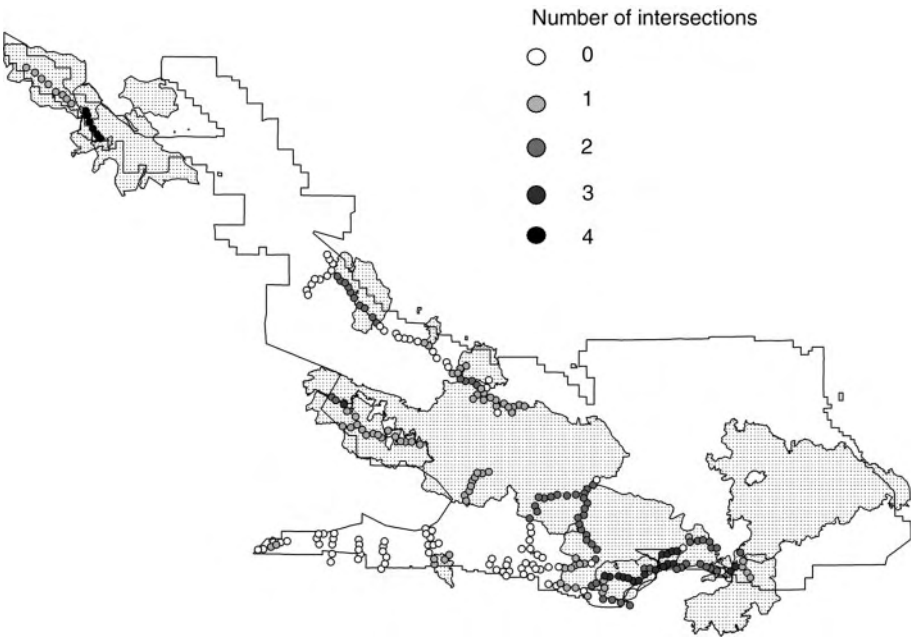

Fig. 2. Map of sample points on fuel breaks classified according to the number of times fires had intersected them from 1980 to 2007. Perimeters of fires that intersected fuel breaks are also shown.

had been burned through backfires to prevent the actively spreading fire from reaching the treatment. In one case (the ~100 000-ha Zaca fire), nearly 33 000 ha burned from backfire activity.

The crews described that they focussed most of their suppression efforts on the backbone fuel breaks, which are typically located along ridge lines. The lateral fuel breaks, running perpendicular to the backbone, were used to contain smaller fires that potentially were spreading within a drainage basin. The crews often put dozer lines down the laterals during the fire under those conditions.

For seven (13%) of the events cases, the fuel break changed the fire behaviour after the intersection such that crews could manoeuvre around the vicinity of the treatment and ultimately successfully suppress the fire.

Statistical analysis

Number of intersections

Almost 40% of the fuel treatments never intersected a fire, but ~30% of the treatments intersected two or more fires. Fires were most likely to intersect fuel breaks in areas where: historic fire frequency was high ($D^2 = 0.18$, $P < 0.001$); fuel breaks were in close proximity to trails ($D^2 = 0.07$, $P = 0.09$); distance to roads was intermediate ($D^2 = 0.04$, $P = 0.001$); historic ignition density was low ($D^2 = 0.02$, $P = 0.04$); and winter solar radiation was low ($D^2 = 0.02$, $P = 0.02$). None of the other variables explained significant variation in number of intersections.

All of these variables that were significant in the bivariate simple regressions were retained in the multiple-regression model explaining number of intersections; however, whereas the linear term and its quadratic were both significant for distance to roads in the simple model, only the linear term was retained in the multiple-regression model, which was highly significant ($D^2 = 0.28$, $P < 0.001$).

The map surface generated by applying the formula and coefficients of the multiple-regression model to the original GIS maps of the predictor variables showed the relative distribution of where fires are predicted to intersect fuel breaks most frequently (Fig. 3). The Pearson's correlation coefficient for the observed versus predicted observations was 0.57, and the RMSE was 0.74.

Fuel-treatment outcome

Five of the independent variables explained more than 5% of the residual deviance ($D^2 > 5$) in the bivariate simple regression analysis. Fires were most likely to stop at a fuel break when: there was firefighter access to treatment ($D^2 = 0.12$, $P = 0.01$); fire size was smaller ($D^2 = 0.11$, $P = 0.009$); vegetation age was younger ($D^2 = 0.10$, $P = 0.01$); fuel breaks were longer ($D^2 = 0.07$, $P = 0.03$); and there were adequate firefighting resources ($D^2 = 0.07$, $P = 0.12$). The fuel break outcome was not significantly explained by fire season, weather, any of the biophysical variables or distance to human infrastructure.

There was significant multicollinearity between access to treatment and vegetation age ($D^2 = 0.05$, $P = 0.09$). Access to treatment was also significantly related (again through simple bivariate regression) to the condition of the fuel break (better condition contributed to better access, $D^2 = 0.10$, $P = 0.05$) and fuel break width (wider fuel breaks contributed to better access, $D^2 = 0.06$, $P = 0.08$). These two variables were not considered in the multiple-regression model, but their effects were indirectly evaluated in the SEM.

After entering the significant variables in order of deviance explained and performing forward and backward stepwise regression, the final multiple-regression model for fuel-treatment outcome retained access, fire size and length of fuel break. The model was significant at $P = 0.006$, with a D^2

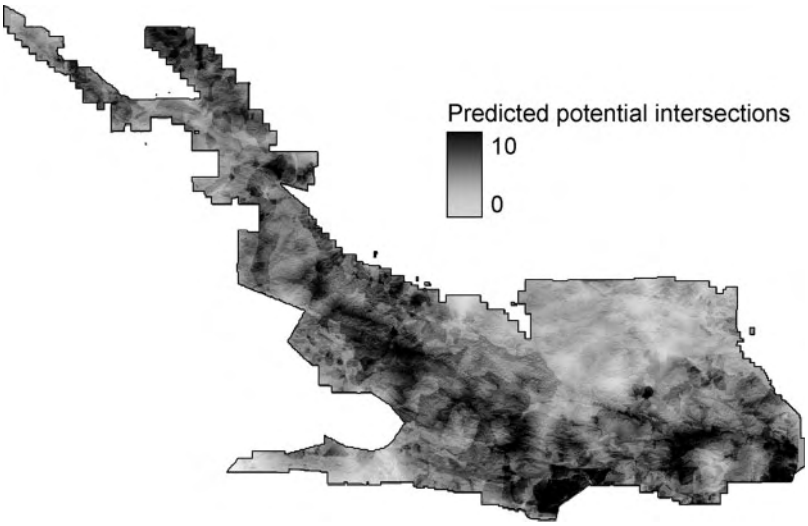

Fig. 3. Map showing predicted distribution of areas where fires and fuel breaks are most likely to intersect in the Los Padres National Forest, CA.

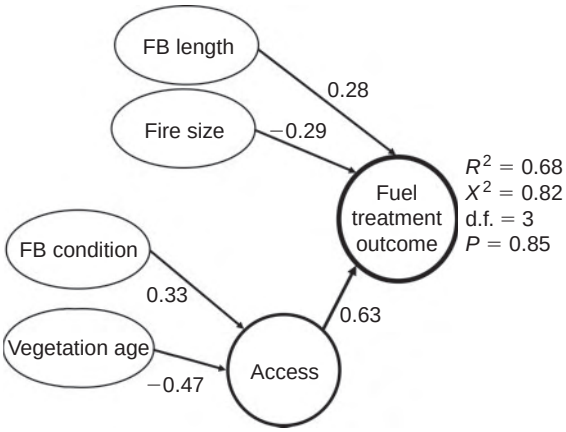

Fig. 4. Structural equation model of factors that directly and indirectly explain why fires stopped at fuel breaks (FBs) in the Los Padres National Forest. Coefficients shown along arrows are standardised values.

of 0.29. The leave-one-out cross-validation of the multiple-regression model resulted in an AUC of 0.84.

Based on exploration of the relationships among the variables, our structural equation model that explained why fires stopped at fuel breaks included the direct effects of the significant explanatory variables from the multiple regression (access, fire size and fuel break length) as well as indirect effects of vegetation age and fuel break condition based on their influence on treatment access (Fig. 4). The model chi-square was low (0.82), with a high P value (0.85) that indicated there was no significant difference between the data and our hypothesised model. The proportion of variance explained in fuel treatment outcome ($R^2 = 0.68$) was substantially higher than the generalised linear mode (GLM) multiple-regression model equivalent ($D^2 = 0.29$). Removal of any paths in the model resulted in an increase of chi-square that was greater than 3.84. The standardised coefficients in the SEM results indicated that fuel-treatment effectiveness was positively related to access to treatment and fuel break length and negatively related to fire size. There was a positive indirect effect of fuel break condition and a negative indirect effect of vegetation age on fuel-treatment outcome due to their direct effects on access to treatment.

Discussion

Because prefire fuel manipulation is one of the primary strategies used to manage wildfire, we evaluated the role that fuel breaks have played in controlling the extent of large fires in southern California. For a fuel break to function, it must: (1) encounter a fire, and (2) successfully function as expected, which in the WUI is to stop the spread of fire, either directly or by facilitating the alteration of fire behaviour. During the nearly three decades of our analysis, most of the fires that occurred (79%) burned without intersecting a fuel break, and many segments of fuel breaks never encountered a fire. However, certain fuel breaks intersected several fires, and our results showed that we can identify the factors that influence the likelihood of intersection and we can map where on the landscape treatments are likely to intersect fires. Our results also showed that the primary role of fuel breaks is to provide firefighters safe access to perform suppression activities. Only a few of the other variables that we considered as potentially influencing the role of fuel breaks were statistically significant.

A potential reason that some environmental variables did not significantly affect the fuel break–fire outcome is that they may have been relatively uniform across our study area relative to the sample size, which may have been too small to adequately explain substantial variation. In other words, there may be additional reasons that fires stop at fuel breaks, but there were not enough samples to adequately quantify these different effects. Regardless, the results strongly suggest that fires will

generally not stop at fuel breaks in our study area unless firefighters are present to suppress the fire. There was only one event in our analysis in which a fire stopped at a fuel break without active fire suppression. With firefighter control, however, fuel breaks had a decent success rate (46%), which is the exact same success rate found in old (and one of the only other) analyses of fuel break effectiveness in the region (Cecil 1941).

It is important to keep in mind that our statistical analysis was based on a response variable describing whether the fire stopped at the fuel break and did not reflect the role of fuel breaks in changing fire behaviour. In seven cases, the treatments did change the behaviour of the fire that ultimately allowed subsequent control, and if these are included, the success rate increases to 56%. The key variables that may be most important to consider in fire management and planning, therefore, may be related to those that affect firefighting activities.

Our results showed that access to the fuel break was critical in the success of fire control, and this was echoed by firefighters who generally viewed access as a function of the spread rate of the fire relative to location of fire origin, the location of the fuel break and the location of the crews at the time of the fire. Also, if the fire started at night, there were fewer people available, so they would have to travel from home to work to get to the engine. The speed of response is an important component in successful fire control (Halsey 2005), and this has been recognised for many decades, particularly in the Los Padres National Forest, which has extensive roadless and trailless areas (Show *et al*. 1941).

Once firefighters were in the vicinity of the fuel break, vegetation structure played an important role in determining whether they could access the fuel break in time to stop the fire, and this is reflected in our SEM (Fig. 4). In the high-elevation chaparral of the Los Padres National Forest, as well as chaparral elsewhere, stand age and fuel loads play a limited role in stopping the spread of fire, particularly during extreme weather conditions when fires will readily spread through all age classes of vegetation (Moritz 1997; Moritz *et al*. 2004; Keeley and Zedler 2009). Therefore, whereas young fuels may constrain fire in other vegetation types, the primary relationship in the present study is with firefighter access to fuel breaks. Chaparral is composed of dense, woody shrubs that form a continuous cover that makes it difficult to manoeuvre and contributes to dangerous flame lengths (Conard and Weise 1998), and therefore, younger vegetation makes it easier for crews to access the fuel break and establish an anchor point. In many cases, the crews will re-establish the fuel break (e.g. through dozers or handlines) once they arrive. However, if the fuel break is close to a fast-moving fire, there may not be time to re-establish the break and to fully prepare. Therefore, the condition of the fuel break was significant in explaining access to treatment owing to the time required to restore a fuel break in poor condition, especially when fires were fast and near. This suggests that maintaining current fuel breaks may be an important component of effective fire management.

Although maintaining current fuel breaks may increase their success rate, the length of the fuel break was also important, although fuel break width was insignificant. A possible reason that fuel break width was insignificant is that the widths provided in the data may have been approximations, and we also needed to average the range of widths for several of the fuel breaks. We considered that fuel break length may have facilitated firefighter access, but those two variables were not correlated. Therefore, longer fuel breaks may potentially provide greater number of opportunities for fires to intersect fuel breaks. Another consideration is that we did not explore the relative difference of main fuel breaks versus secondary or lateral fuel breaks (which tend to be shorter in length), and other research in the region has shown that laterals are not as effective and do not substantially improve firefighting (Omi 1977).

Although interviews confirmed that the rate of fire spread and fire weather conditions play an important role in the efficacy of fuel breaks (e.g. they determine whether fire crews can access the treatment on time or whether conditions are safe enough to anchor at the break), the only variable related to fire spread rate that was significant in our study was fire size. Although fire size can be a function of multiple interacting factors, larger fires are generally associated with faster spread rates (Anderson 1983; Finney 2003), and faster, or erratic, spread rates are likely to vary as a function of fire–atmosphere couplings as well as fire-induced wind (Sun *et al*. 2009). We made the basic assumption that fire size is correlated with rate of spread at least during some point during the duration of the fire, and consistent with our expectations, small fires were more likely to stop at fuel breaks than large fires. Although there is also the possibility fire size is smaller when fuel breaks are effective because the fuel break played a role in constraining the fire, conversations with firefighters during the interviews confirmed that larger fires are typically associated with severe weather conditions and are much more difficult and dangerous to control.

Although we explored two different sets of weather data, and multiple weather indicators, the likely reason that we found no statistically significant relationships is that many of our fires burned over several days, and we had no way of knowing the exact date and time that the intersection with the fuel break actually occurred. Because weather is highly variable over space and time, we were therefore unable to assign exact weather conditions to the location or moment of intersection. One example of the effect of weather on fuel break outcome that we were unable to capture was the Wheeler Fire number 2 of 1985, which burned for 2 weeks. The weather conditions during the first 4 days were erratic and extreme; the only fuel breaks that were effective were those that intersected the fire after these first 4 days (Salazar and González-Cabán 1987).

Even in other forest types, the influence of fuel breaks on fire spread and severity can be variable and are likely to vary according to weather conditions and other variables (Schoennagel *et al*. 2004). A 'one size fits all' approach to fire management has been cautioned against in several recent papers (Noss *et al*. 2006; Reinhardt *et al*. 2008; Keeley *et al*. 2009*b*) and we reiterate the warning for chaparral. There is high variability and complexity in the circumstances leading up to the intersection of fires and fuel breaks and the outcome of what happens (Keeley *et al*. 2009*a*), and the effectiveness of the fuel break in our study could not be predicted by variables such as fuel type, elevation, slope or average climate conditions. Furthermore, our study only accounted for the final realisation of the fire event and not for finer-scale factors that change fire behaviour during the course of the fire event or firebrand production during the spread of the fire.

Although many of the biophysical variables we considered did not significantly explain the role of fuel breaks in stopping fires, a suite of biophysical and human variables was important for developing a model that can predict which parts of the landscape are likely to experience the highest number of fire and fuel break intersections, at least on the landscape from which the model was developed. It was no surprise that historic fire frequency was the strongest predictor of number of fire–fuel break intersections because some areas are inherently more fire-prone than others. The negative relationship between ignition density and number of intersections was unexpected, but may be because the relationship between humans and fire tends to be non-linear (Syphard *et al*. 2007, 2009), and different factors control fire ignitions versus fire occurrence or spread (Syphard *et al*. 2007, 2008). Aside from solar radiation (which varies slowly over time), the other significant variables (distance to trails and roads) tend to be spatially dynamic (as more roads or trails are constructed), which means that predictive mapping models may have to be refitted as landscapes change.

The fact that a substantial proportion of the fuel breaks never intersected a fire during the course of the study suggests that fuel breaks have not historically been placed in areas where fires are most likely to intersect them. Although it is possible that a fire may cross these fuel breaks in the future, fire managers might want to consider focussing maintenance and new construction in areas where fires and fuel treatments are most likely to intersect and thus provide greater opportunities for controlling fires. Construction of fuel breaks can be costly (Agee *et al*. 2000) and may lead to negative resource effects in the chaparral (Witter and Taylor 2005; Merriam *et al*. 2006). Therefore, mapping where fires are most likely to intersect fuel treatments could be part of the planning process to increase efficiency of new construction.

Although fuel breaks surrounding communities clearly serve an important role in creating a safe space for firefighting activities, fuel breaks in remote areas and in areas that rarely or never intersect fires have a lower probability to serve a beneficial function. It is important to consider strategic placement in terms of values at risk, near communities and the WUI, in shrubland ecosystems or other areas where the resource benefits of fuel treatments have not been demonstrated as they have been in forests. Despite strong arguments for locating fuel breaks near communities where protection is most needed (Winter *et al*. 2002; Halsey 2005; Keeley *et al*. 2009*b*), most fuel break proposals continue to be located in more remote wildland areas (Ingalsbee 2005; Schoennagel *et al*. 2009). Other finer-scale factors may also be important for strategic placement (e.g. placing them on ridgelines or other landscape features that offer tactical advantages; Ingalsbee 2005). It is also important to consider that many homes are not ignited owing to direct fire spread, but from firebrands, and more research is needed on the location of fuel breaks relative to firebrand production and structure exposure (Mell *et al*. 2010).

Although this study focussed on the role of fuel breaks in southern California, the increasing threat of fire to human lives and structures, as well as to natural resources, is far-reaching within the United States as well as many other regions in the world. As more fuel breaks are being constructed to mitigate fire risk, there is ongoing need to better understand their role in controlling wildfires. Our methods of systematically exploring the historic role of fuel breaks could be adopted anywhere, and indeed, the specific factors affecting the role of fuel breaks are likely to vary even within the southern California region. Controls over fire regimes vary at multiple scales (Falk *et al*. 2007). Although there are substantial differences in fire regimes between conifer forests and shrublands, southern California is also spatially diverse, and the relative importance of variables predicting fuel break effectiveness, and where fires intersect fuel breaks, may vary according to the scale of the analysis or across the region.

Acknowledgements

Funding for this research was provided by the US Geological Survey Multi-Hazards Demonstration Project. We thank John Abatzoglou and Tim Brown for providing weather data, Jim Grace for providing guidance on structural equation modelling and Steve Davis for providing expert knowledge about firefighting on the Los Padres National Forest. Thanks also to Erik C. Berg, Richard Halsey, Brian Halstead and Hugh Safford for reviewing the manuscript and offering many valuable suggestions. Any use of trade, product or firm names in this publication is for descriptive purposes only and does not imply endorsement by the US government.

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Publication Brief for Resource Managers

Release:	Contacts:	Email:	Phone:
October 2011	Jon E. Keeley	jon_keeley@usgs.gov	559-565-3170
	Alex Syphard	asyphard@consbio.org	619-328-1001

USGS Western Ecological Research Center | Sequoia and Kings Canyon Field Station | 47050 Generals Hwy #4, Three Rivers, CA 93271

Fuel Break Effectiveness in Southern California Depends on Firefighter Access

In California, the predominant approach to mitigating wildfire risk is the construction of fuel breaks, but there has been little systematic research on their role in controlling large fires.

Two studies led by USGS and the Conservation Biology Institute have examined the factors affecting fuel break effectiveness in national forests. Both studies concluded that in general, fuel breaks played an important role in controlling large fires, but only when they facilitated fire management activities, primarily by providing access for firefighters.

The first study, published in *International Journal of Wildland Fire*, constructed a spatial database of fuel breaks in the Los Padres National Forest to map where fires and fuel breaks most commonly intersect. Researchers evaluated whether fires stopped or crossed over fuel breaks over a 28-year period, and compared the outcomes with site characteristics, weather and firefighting activities taken place.

In Los Padres, fires stopped at fuel breaks 46% of the time, although many fuel breaks never intersected fires. Among the key factors leading to fire stoppage was firefighter access to the fuel break, illustrating the importance of strategically locating fuel breaks.

The second study, published in *Forest Ecology and Management*, examined fuel breaks and fires at Los Padres, Angeles, San Bernardino and Cleveland National Forests over a 30-year period. While the relative importance of factors affecting fuel break effectiveness varied among forests, the fuel breaks' primary role was consistently to facilitate fire management. Again, fuel breaks helped control large fires primarily when they provided access for firefighting activities.

In both studies, a large number of fuel breaks never intersected fires, showing that fuel breaks are often located in areas where fires are not likely to occur. Models and maps showing where fuel breaks and fires are most likely to intersect, developed for all four forests, could be incorporated into the planning process for better strategic placement of new construction.

Both studies suggest that fuel breaks can play a role in fire control, but mainly when firefighters have access to them. Managers may need to account for access points to strategically and efficiently locate fire breaks.

Management Implications

- A substantial number of fuel breaks are never intersected by fires.
- Factors affecting fuel break effectiveness varied among the four southern California forests, forests, but they primarily served to facilitate fire management activities.
- Firefighter access — to fuel breaks for backfires and other control measures — was the most important determinant of their effectiveness.
- Among the forests studied, only 22% to 47% of fires stopped at fuel breaks, even when firefighters could access them.

THIS BRIEF REFERS TO:

Syphard, A.D., J.E. Keeley, T.J. Brennan. 2011. Comparing the Role of Fuel Breaks Across Southern California National Forests. Forest Ecology and Management 261(2011): 2038-2048. doi: 10.1016/j.foreco.2011.02.030

Syphard, A.D., J.E. Keeley, T.J. Brennan. 2011. Factors Affecting Fuel Break Effectiveness in the Control of Large Fires on the Los Padres National Forest, California. International Journal of Wildland Fire 20: 764-775. doi: 10.1071/WF10065

http://www.werc.usgs.gov/seki
http://www.werc.usgs.gov/ProductDetails.aspx?ID=4550

BLM_CA_Palm_Springs_South_Coast_RMP

From: Dan Silver <dsilverla@me.com>
Sent: Saturday, December 17, 2011 1:37 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Revised South Coast Resource Management Plan (RMP) - ADDITIONAL COMMENT

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov

Dear Mr. Kalish:

Please accept this additional comment from Endangered Habitats League:

We specifically recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

Thank you.

Sincerely,

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA 90069-4267

213-804-2750
dsilverla@me.com
www.ehleague.org

BLM_CA_Palm_Springs_South_Coast_RMP

From: Mpo711@aol.com
Sent: Thursday, November 03, 2011 9:18 AM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and EIS

I support Alt. B. I am also requesting that shortcommings be addressed in a timely efficient manner. Thank you,Mark Polinsky 7047 Camino Degrazia SD,Ca 92111.

BLM_CA_Palm_Springs_South_Coast_RMP

From: DeSimone, Sandy <SDESIMONE@audubon.org>
Sent: Thursday, November 03, 2011 9:55 AM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and EIS

November , 2011

South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
<Greg_Hill@blm.gov>

RE: South Coast Draft Resource Management Plan and Environmental Impact Statement

Gentlepersons:

I appreciate the opportunity to comment on the revised South Coast RMP. As a Southern California resident who values our natural resources, I wish to support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

However, there are significant shortcomings that cut across all the alternatives – including Alternative B. These should be addressed in the final RMP:

- Fuel treatments, such as clearing and prescribed burning, have serious adverse biological consequences, such as conversion to weedy, flammable species. Treatments should occur only where effective – in strategic locations at the urban-wildland interface to create access points and fuel breaks for firefighting activities – and only *as needed*. A non-scientific, predetermined acreage target should be eliminated.
- Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.
- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering my views.

Sincerely.

Sandy DeSimone, Ph.D.
102 Bell Canyon Rd.
Trabuco Canyon, CA 92679

Sandy DeSimone, Ph.D.
Director - Research and Education
Starr Ranch Sanctuary
Audubon California
100 Bell Canyon Road
Trabuco Canyon, CA 92679
Phone: 949-858-0309
Fax: 949-858-1013
www.starrranch.org/
www.facebook.com/audubonstarrranch
Donations: http://starrranch.org/donate

Check out our LIVE nest cams: www.starr-ranch.org/

BLM_CA_Palm_Springs_South_Coast_RMP

From: JEDIRUIZ@aol.com
Sent: Thursday, November 03, 2011 10:17 AM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and Environmental Impact Statement

Dear Mr. Hill:

As a Southern California resident, I support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

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- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you.

Diana Ruiz

801 S. University Dr.
Riverside, CA 92507

BLM_CA_Palm_Springs_South_Coast_RMP

From: Bob Hansen <awildtrout@gmail.com>
Sent: Thursday, November 03, 2011 10:43 AM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and EIS

Gentlepersons:

I appreciate the opportunity to comment on the revised South Coast RMP. As a Southern California resident who values our natural resources, I wish to support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

However, there are significant shortcomings that cut across all the alternatives – including Alternative B. These should be addressed in the final RMP:

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- Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.
- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering my views.

Sincerely.
The Hansen Family
26625 Avenida Deseo
Mission Viejo, CA 92691

BLM_CA_Palm_Springs_South_Coast_RMP

From: Paul Carlton <pfcsage@cox.net>
Sent: Thursday, November 03, 2011 11:24 AM
To: Hill, Gregory C
Subject: Revised South Coast Draft Resource Management Plan

Concerned BLM Personnel

My name is Paul Carlton and I am a resident of Southern California. I highly value the natural resources of Southern California and have worked many hours to protect these resouces. I strongly support Alternative B, the Conservation Alternative because it best provides for public access while doing the best job of protecting the area's stressed biological systems. In comparison to the Preferred Alternative, the Conservation Alternative reduces motorized access. It protects more land designated as Areas of Critical Environmental Concern. The Conservation Alternative better supports the San Diego MSCP and Riverside MSHCP which balance environmental, public access and economic goals. I also hope the BLM will consider habitat fragmentation in considering rights of way for renewable energy projects which hopefully can be located outside Areas of Critical Environmental Concern. Thank you for the work you have done and for opting for the Conservation Alternative.

Paul Carlton
Environmentalist
San Clemente

BLM_CA_Palm_Springs_South_Coast_RMP

From: Jack Eidt <jackeidt@yahoo.com>
Sent: Thursday, November 03, 2011 2:55 PM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and EIS

South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
<Greg_Hill@blm.gov>

RE: South Coast Draft Resource Management Plan and Environmental Impact Statement

Gentlepersons:

I appreciate the opportunity to comment on the revised South Coast RMP. As a Southern California resident and Director of Wild Heritage Planners, an organization dedicated to sustainable environmental planning, I wish to support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

However, there are significant shortcomings that cut across all the alternatives – including Alternative B. These should be addressed in the final RMP:

- Fuel treatments, such as clearing and prescribed burning, have serious adverse biological consequences, such as conversion to weedy, flammable species. Treatments should occur only where effective – in strategic locations at the urban-wildland interface to create access points and fuel breaks for firefighting activities – and only *as needed*. A non-scientific, predetermined acreage target should be eliminated.
- Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.
- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering my views.

Sincerely.

Jack Eidt
Director - Wild Heritage Planners
www.WilderUtopia.com - Coexisting in the Great Unknown
Facebook - (http://www.facebook.com/pages/WilderUtopia/182257315181045)

Twitter - @WilderUtopia (http://twitter.com/WilderUtopia)
Office 323 362 6737

BLM_CA_Palm_Springs_South_Coast_RMP

From: Rick Pruetz <arje@attglobal.net>
Sent: Thursday, November 03, 2011 5:46 PM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and EIS

November 3, 2011

South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
Via Greg_Hill@blm.gov

RE: South Coast Draft Resource Management Plan and Environmental Impact Statement

Hello:

I urge you to support Alterative B, the Conservation Alternative. Alt B best strikes a balance between public access and protection of resources. However, even Alt B should be revised so that the Riverside MSHCP and San Diego MSCP are protected as Areas of Critical Concern and that the Plan clearly prohibit in these areas all development including renewable as well as non-renewable energy development.

Thank you,

Rick Pruetz, FAICP
Planning & Implementation Strategies
522 The Strand
Hermosa Beach, California 90254
arje@attglobal.net
310.749.5535

BLM_CA_Palm_Springs_South_Coast_RMP

From: Paul <organix@earthlink.net>
Sent: Thursday, November 03, 2011 6:06 PM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and EIS

RE: South Coast Draft Resource Management Plan and Environmental Impact Statement

Gentlepersons:

I appreciate the opportunity to comment on the revised South Coast RMP. As a Southern California resident who values our natural resources, I wish to support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

However, there are significant shortcomings that cut across all the alternatives – including Alternative B. These should be addressed in the final RMP:

- Fuel treatments, such as clearing and prescribed burning, have serious adverse biological consequences, such as conversion to weedy, flammable species. Treatments should occur only where effective – in strategic locations at the urban-wildland interface to create access points and fuel breaks for firefighting activities – and only *as needed*. A non-scientific, predetermined acreage target should be eliminated.
- Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.
- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering my views.

Sincerely.

Paul Gray
San Diego California

BLM_CA_Palm_Springs_South_Coast_RMP

From: Evi Meyer <evimeyer@cox.net>
Sent: Thursday, November 03, 2011 8:21 PM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and EIS

November 3, 2011

South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
<Greg_Hill@blm.gov>

RE: South Coast Draft Resource Management Plan and Environmental Impact Statement

Gentlepersons:

I appreciate the opportunity to comment on the revised South Coast RMP. As a Southern California resident who values our natural resources, I wish to support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

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- Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.
- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering my views.

Sincerely.

Evi Meyer
448 Via Almar
Palos Verdes Estates, CA 90274

BLM_CA_Palm_Springs_South_Coast_RMP

From: Nina Pearlson Leung <npleung@pacbell.net>
Sent: Friday, November 04, 2011 8:31 AM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and EIS

November 3, 2011

South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
<Greg_Hill@blm.gov>

RE: South Coast Draft Resource Management Plan and Environmental Impact Statement

Gentlepersons:

I appreciate the opportunity to comment on the revised South Coast RMP. As a Southern California resident who values our natural resources, I wish to support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

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- Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.
- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering my views.

Sincerely.

Nina Leung
4538 Jasmine Avenue
Culver City, CA 90232

BLM_CA_Palm_Springs_South_Coast_RMP

From: Jim Bell <jimbellelsi@cox.net>
Sent: Friday, November 04, 2011 12:11 PM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and EIS

I support plan B with suggested up-grades and so should everyone who understands life-support sustainability.

BLM_CA_Palm_Springs_South_Coast_RMP

From: Cheryl Thomas <cthomas1313@cox.net>
Sent: Friday, November 04, 2011 12:27 PM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and Environmental Impact Statement
Attachments: BLM LETTER.doc

Cheryl Thomas
Cthomas1313@cox.net
Phone: 949-294-2275
Fax: 949-666-7630

November 3, 2011

South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
<Greg_Hill@blm.gov>

RE: South Coast Draft Resource Management Plan and Environmental Impact Statement

Gentlepersons:

I appreciate the opportunity to comment on the revised South Coast RMP. As a Southern California resident who values our natural resources, I wish to support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

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- Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.
- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering my views.

Sincerely.

NAME: Cheryl Thomas
ADDRESS: 24911 Hayuco, Mission Viejo, CA 92692

BLM_CA_Palm_Springs_South_Coast_RMP

From: Beeler <jgbeeler@sbcglobal.net>
Sent: Friday, November 04, 2011 1:11 PM
To: Hill, Gregory C
Subject: South Coast Draft Rescorce Management Plan and Environmental Impact Statement

November 3, 2011
South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
<Greg_Hill@blm.gov>

RE: South Coast Draft Resource Management Plan and Environmental Impact Statement

Gentlepersons:

I appreciate the opportunity to comment on the revised South Coast RMP. As a Southern California resident who values our natural resources, I wish to support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.
However, there are significant shortcomings that cut across all the alternatives – including Alternative B. These should be addressed in the final RMP:

- Fuel treatments, such as clearing and prescribed burning, have serious adverse biological consequences, such as conversion to weedy, flammable species. Treatments should occur only where effective – in strategic locations at the urban-wildland interface to create access points and fuel breaks for firefighting activities – and only *as needed*. A non-scientific, predetermined acreage target should be eliminated.
- Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.
- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering my views.

Sincerely.

Gary and Jan Beeler
1680 Loch Ness Dr.
Fallbrook, Ca.
92028

BLM_CA_Palm_Springs_South_Coast_RMP

From: Richard Cabe <cabepiano@verizon.net>
Sent: Friday, November 04, 2011 3:07 PM
To: Hill, Gregory C

South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262

November 4, 2011

South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
<Greg_Hill@blm.gov>

RE: South Coast Draft Resource Management Plan and Environmental Impact Statement

Gentlepersons:

We appreciate the opportunity to comment on the revised South Coast RMP. As Southern California residents who value our natural resources, we wish to support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

However, there are significant shortcomings that cut across all the alternatives – including Alternative B. These should be addressed in the final RMP:

- Fuel treatments, such as clearing and prescribed burning, have serious adverse biological consequences, such as conversion to weedy, flammable species. Treatments should occur only where effective – in strategic locations at the urban-wildland interface to create access points and fuel breaks for firefighting activities – and only *as needed*. A non-scientific, predetermined acreage target should be eliminated.
- Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.
- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering our views.
We are members of National Audubon Society, Sierra Club and many other organizations protecting our environment. We spend time leading field trips and classes teaching children and adults about our need to protect & enhance sensitive habitat for plant and animal species.
Sincerely.

Richard and Pat Cabe
19332 Evening Hill Drive
Huntington Beach CA 92648

BLM_CA_Palm_Springs_South_Coast_RMP

From: JOHN AVISE <johnavise@sbcglobal.net>
Sent: Friday, November 04, 2011 5:04 PM
To: Hill, Gregory C
Subject: RE: South Coast Draft Resource Management Plan and Environmental Impact

November 4, 2011

South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs , CA 92262
<Greg_Hill@blm.gov>

Gentlepersons:

We appreciate the opportunity to comment on the revised South Coast RMP. We are

Southern California residents who value our natural resources, and frequently visit the desert to bird watch, monitor Swainson's Hawk migration, photograph birds and other vertebrates, wildflowers, and native plants. Several of our colleagues are involved in scientific research on desert plants as well. We wish to support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best

job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and

gives more land the protection of designation as Areas of Critical Environmental

Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

However, there are significant shortcomings that cut across all the alternatives

– including Alternative B. These should be addressed in the final RMP:
* Fuel treatments, such as clearing and prescribed burning, have serious adverse biological consequences, such as conversion to weedy, flammable species.

Treatments should occur only where effective – in strategic locations at the urban-wildland interface to create access points and fuel breaks for

firefighting activities – and only as needed. A non-scientific, predetermined acreage target should be eliminated.

* Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent

with plan management guidance and species conservation goals.

* Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering our views.

Sincerely,

John Avise

Audubon Club past director and long time member
UC Irvine distinguished professor in Ecology and Evolutionary Biology
National Academy of Sciences and American Academy of Arts and Sciences member

Joan Avise
California Native Plant Society Member
Member Orange County Chapter of the Society for Conservation Biology and Conservation Biology Club at UCI.

78 Murasaki St.,
Irvine, CA.

BLM_CA_Palm_Springs_South_Coast_RMP

From: Mary Roberts <maryrobertsstm@gmail.com>
Sent: Saturday, November 05, 2011 9:54 AM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and EIS

I appreciate the opportunity to comment on the revised South Coast RMP. As a Southern California resident who values our natural resources, I wish to support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

However, there are significant shortcomings that cut across all the alternatives – including Alternative B. These should be addressed in the final RMP:

- Fuel treatments, such as clearing and prescribed burning, have serious adverse biological consequences, such as conversion to weedy, flammable species. Treatments should occur only where effective – in strategic locations at the urban-wildland interface to create access points and fuel breaks for firefighting activities – and only *as needed*. A non-scientific, predetermined acreage target should be eliminated.
- Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.
- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering my views.

Sincerely.

Mary Roberts
17102 Los Modelos
Fountain Valley, CA 92708

BLM_CA_Palm_Springs_South_Coast_RMP

From: gloria schlaepfer <gschlaep@roadrunner.com>
Sent: Saturday, November 05, 2011 4:17 PM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and EIS

Dear Directors,

Thank you for the opportunity to comment on the revised South Coast RMP.
As a Southern California resident who values our natural resources, I wish to support **Alternative B, the Conservation Alternative**. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

There are still, however, significant problems that show up on all the alternatives – including Alternative B. These should be addressed in the final RMP:

- Fuel treatments, such as clearing and prescribed burning, have serious adverse biological consequences, such as conversion to weedy, flammable species. Treatments should occur only where effective – in strategic locations at the urban-wildland interface to create access points and fuel breaks for firefighting activities – and only *as needed*. A non-scientific, predetermined acreage target should be eliminated.
- Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.
- Importantly, due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for the agency's progress on this plan, and thank you for considering my views.

Sincerely,

Gloria G. Schlaepfer
1424 Vista del Mar Drive
Fullerton, CA 92831

BLM_CA_Palm_Springs_South_Coast_RMP

From: Lydia Garvey <wolfhowlmama@yahoo.com>
Sent: Saturday, November 05, 2011 10:42 PM
To: Hill, Gregory C
Subject: South Coast draft RMP and EIS, Alternative B (Conservation Alternative)!

I strongly urge you to NIX (ar at least extremely limit) ORVs, resourse extraction & grazing. CA (along with HI & FL) has the highest, alarming rate of species extinction, esp. in this area of 20M people. Alt. B has the greatest amount of land as 'Area of Critical Envir. Concern', but it needs to positively address 'fire management'. Fuel treatments (clearing,
burning) needs to specify- to be done Only at the 'urban/wildlife interface' & only by scientifically proven rational. Also, Protect Riverside MSHCP & San Diego MSCP as Areas of Critical Envir. Concern' (ACEC), And (due to habiat fragmentation) 'right of ways' of energy projects need to be Outside ACEC!

South Coast is Not a sacrifice area! & needs to be preserved as much a possible!- too much has been destroyed of this spectacular, unique, world heritage area. Do your job- Protect Our Public lands, waters, wildlife & health! You work for citizens, Not industry!

Your attention to this most urgent matter would be much appreciated by all present & future generations of all species.

Thank you

Lydia Garvey Public Health Nurse
429 S 24th Clinton OK 73601

BLM_CA_Palm_Springs_South_Coast_RMP

From: Christopher A Reed <chris.reed@ucr.edu>
Sent: Sunday, November 06, 2011 8:13 AM
To: Hill, Gregory C
Subject: South Coast Resource Management Plan

South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
<Greg_Hill@blm.gov>

RE: South Coast Draft Resource Management Plan and Environmental Impact Statement

Dear Mr Hill:

I'd like to comment on the revised South Coast RMP. As a Laguna Beach resident who truly values our natural resources, I'd like to support Alternative B, the Conservation Alternative.

However, there are shortcomings that should be addressed in the final RMP:

- I have learned a lot about fuel treatments recently. I work with the city of Laguna Beach to remove serious invasive exotics such as pampas grass and fountain grass. I have found that the city's goat grazing techniques have serious adverse biological consequences, such as conversion to weedy, flammable species. Treatments such as goat grazing should be implemented only *as absolutely necessary*. Non-scientific, predetermined acreage targets should be eliminated.
- Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.
- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern. Wind farms may provide energy but they have a big environmental impact and are an eyesore in many beautiful parts of our State.

Thank you for your agency's progress to date on this plan, and thank you for considering my views.
Sincerely.
Chris Reed

BLM_CA_Palm_Springs_South_Coast_RMP

From: Jean Dooley <jeanwdooley@yahoo.com>
Sent: Sunday, November 06, 2011 1:17 PM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and EIS

I am in agreement with, and support, Alternative B, the Conservation alternative. Jean Dooley

BLM_CA_Palm_Springs_South_Coast_RMP

From: Jane Block <jblock29@charter.net>
Sent: Sunday, November 06, 2011 8:54 PM
To: Hill, Gregory C
Subject: Revised South Coast RMP

November 3, 2011

South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
<Greg_Hill@blm.gov>

RE: South Coast Draft Resource Management Plan and Environmental Impact Statement

Gentlepersons:

I appreciate the opportunity to comment on the revised South Coast RMP. As a Southern California resident who values our natural resources, I wish to support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

However, there are significant shortcomings that cut across all the alternatives – including Alternative B. These should be addressed in the final RMP:

- Fuel treatments, such as clearing and prescribed burning, have serious adverse biological consequences, such as conversion to weedy, flammable species. Treatments should occur only where effective – in strategic locations at the urban-wildland interface to create access points and fuel breaks for firefighting activities – and only *as needed*. A non-scientific, predetermined acreage target should be eliminated.
- Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.
- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering my views.

Sincerely.
Jane Block
424 Two Trees rd
Riverside Ca. 92507
jblock29@charter.net

BLM_CA_Palm_Springs_South_Coast_RMP

From: Jacqueline Heyneman <jheyneman@att.net>
Sent: Monday, November 07, 2011 5:51 AM
To: Hill, Gregory C
Cc: Jim Russell
Subject: South Coast Draft Resource Management Plan and EIS
Attachments: Letter to BLM.docx

Mr. Hill,

Attached please find my personal letter of support for the Conservative Alternative. In fact, the Fallbrook Community Planning Group had reviewed and supported the San Diego County revised MSCP and I hope that the BLM will adopt a plan that will coincidence with those conservation efforts.

November 7, 2011

South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
<Greg_Hill@blm.gov>

RE: South Coast Draft Resource Management Plan and Environmental Impact Statement

Dear Sirs:

I appreciate the opportunity to comment on the revised South Coast RMP. As a Southern California resident who values our natural resources, I wish to support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

There are significant shortcomings that cut across all the alternatives – including Alternative B. These should be addressed in the final RMP:

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- Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.
- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering my views.

Sincerely.
Jacqueline Heyneman, 992 La Vonne Ave. Fallbrook, CA 92028

BLM_CA_Palm_Springs_South_Coast_RMP

From: Biodivlaw@aol.com
Sent: Monday, November 07, 2011 7:29 AM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and EIS

November 3, 2011

South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
<Greg_Hill@blm.gov>

RE: South Coast Draft Resource Management Plan and Environmental Impact Statement

Dear Mr. Hill:

I appreciate the opportunity to comment on the revised South Coast RMP. As a California resident who strongly values our natural resources, I support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

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- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering my views.

Sincerely.

Tara Mueller
4 San Carlos Ave
El Cerrito, CA 94530

BLM_CA_Palm_Springs_South_Coast_RMP

From: summerhillfarmpv@aol.com
Sent: Monday, November 07, 2011 2:55 PM
To: Hill, Gregory C
Cc: dsilverla@me.com
Subject: South Coast Draft Resource Management Plan and Environmental Im

Gentlepersons:

I appreciate the opportunity to comment on the revised South Coast RMP. As a Southern California resident who values our natural resources, I wish to support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

However, there are significant shortcomings that cut across all the alternatives – including Alternative B. These should be addressed in the final RMP:

- Fuel treatments, such as clearing and prescribed burning, have serious adverse biological consequences, such as conversion to weedy, flammable species. Treatments should occur only where effective – in strategic locations at the urban-wildland interface to create access points and fuel breaks for firefighting activities – and only *as needed*. A non-scientific, predetermined acreage target should be eliminated.
- Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.
- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering my views.

Sincerely,

Dr. Charles M. Rockwell D.C.
California Representative,
Endangered Species Coalition
19737 Wildwood West Dr.
Penn Valley, CA 95946

BLM_CA_Palm_Springs_South_Coast_RMP

From: Pam Nelson <pamela05n@yahoo.com>
Sent: Tuesday, November 08, 2011 7:50 AM
To: Hill, Gregory C
Subject: draft south coast resource management plan and eis

Thank you for the opportunity to comment on the draft South Coast RMP. As a native southern Californian, 3rd generation, I have a great interest in preserving what is left of this unique area. There are still important remnants of the varied habitats and resources that can be managed and available to future generations if we are mindful and careful of the value of our surroundings in SoCal. I therefore find Alternative B to be the best approach of management.
I would like to see further changes, though, in the fuel treatments, protection of the MSCP and MSHCP and wildlife corridor and crossings protections. Presently, fuel treatments allow flammable invasives to enter open space at an accelerated rate. A new method of careful thinning needs to be considered. The critical habitats of organisms need more buffer and protection and the fragmentation that is occurring is not keeping up with climate change and dedicated corridor studies.
I appreciate your work and hope that increased staffing can accompany this plan in order to protect the habitat we have left.
Pam Nelson
Warner Springs, CA 92086

EXHIBIT 1

Pages 2-7, 2-8, and 2-9 from Chapter 2, Proposed Actions and Alternatives, 2009 Draft EIS for the Santa Ana River Wash Land Exchange

Under the 1994 SCRMP, three BLM parcels currently designated as the Santa Ana River Wash ACEC (Parcel 107-021, Parcel 107-101, and Parcel 107-121)[3] are managed for the protection of two plants federally listed as endangered species: the Santa Ana River woolly-star (*Eriastrum densiflorum ssp. sanctorum*) and the slender-horned spineflower (*Dodecahema leptoceras*). As currently managed under the SCRMP: 1) the ACEC is unavailable for mineral material sales, is closed to motorized vehicle use, and is unavailable for livestock grazing; and 2) the ACEC is a right-of-way avoidance area.

The Proposed Action would amend the SCRMP to allow the land exchange between the BLM and the District and would modify the existing Santa Ana River Wash ACEC management prescriptions to implement the Wash Plan. In addition, the Proposed Action would amend the SCRMP to execute BLM-desired management actions that are unrelated to the land exchange. Aspects of the Proposed Action that are unrelated to the land exchange include modifications to management of two parcels located within the Wash Plan Area: BLM will assign specific management prescriptions to Parcel 108-081 and will incorporate a portion of the parcel into the Santa Ana River Wash ACEC; and 40 acres of Parcel 107-101, originally inappropriately labeled as ACEC but used as a recreational gun range under a continuing long term lease, will be removed from the Santa Ana River Wash ACEC (Parcel 108-081 and Parcel 107-101 are shown on Figure 2.5, *BLM Parcels in Wash Plan Area* in Section 2.2.1).

In total, the proposed amendment to the SCRMP would:

1. Make up to 400 acres of BLM ACEC Parcel 107-101, currently designated for retention, available for disposal to the District.

2. Incorporate approximately 320 acres and potentially 60 additional acres, depending on appraisal values and the potential need for use of equalization properties, of Offered Lands acquired through the proposed land exchange into the Palm Springs-South Coast Resource Area and designate these acquired lands as part of the Santa Ana River Wash ACEC. The Offered Lands adjoin BLM ACEC Parcel 107-121.

3. Manage the entire Santa Ana River Wash ACEC according to the following management prescriptions:

   - The ACEC is unavailable for mineral material sales, is closed to motorized vehicle use, and is unavailable for livestock grazing.
   - The ACEC is a right-of-way avoidance area, excepting pre-existing rights-of-way that have been duly authorized and/or legally established.
   - The ACEC is available for existing water conservation facilities (a recharge basin known as "D Dike" and its associated water conveyance facilities) pursuant to the Act of October 21, 1976 on Parcel 107-121, in the W1/2, Section 12. The ACEC is available for future water conservation facilities pursuant to FLPMA and/or S.8048 Act of Congress passed on February 20, 1909, as applicable, on Parcel 107-121, in the NE1/4, Section 12.

[3] BLM designated parcel numbers for the property per the SCRMP.

4. Add protection of the SBKR to the management goals for the Santa Ana River Wash ACEC.

5. Designate approximately 178 acres of undeveloped open space within the southern portion of Parcel 108-081 that has not been historically impacted by mineral extraction activities as part of the Santa Ana River Wash ACEC. [Note that this parcel is not part of the land exchange, but is addressed in the proposed SCRMP Amendment]

6. Manage the northerly portion of Parcel 108-081, consisting of approximately 102 acres within what is known as the Seven Oaks Dam Borrow Pit, as unavailable for mineral material sales and live-stock grazing. [Note that this parcel is not part of the land exchange, but is addressed in the proposed SCRMP Amendment]

7. Remove approximately 40 acres leased for a shooting range on Parcel 107-101 from the Santa Ana River Wash ACEC.[4] This portion of the parcel is leased under the Recreation and Public Purpose Act to the Inland Fish and Game Club. [Note that this land is not part of the land exchange, but is addressed in the proposed SCRMP Amendment]

Selected and Offered Lands are shown in Figure 2.3, *Assessor Parcel and Existing Ownership Map*. Proposed ownership after the exchange is displayed on Figure 2.4, *Proposed Ownership Map*. The legal descriptions of the BLM lands and the District's lands in the proposed exchange are shown in Table 2.1, *BLM Lands Proposed for Exchange (Selected Lands)* and Table 2.2, *District Lands Proposed for Exchange (Offered Lands)*. The final selection of parcels to be exchanged depends on the appraised values of the parcels.

Table 2.1 BLM Lands Proposed for Exchange (Selected Lands)

	BLM SCRMP Parcel #	APNs	Legal Description	Acres
Core Exchange Parcels	107-101	0291-111-03, 0291-121-01, 0291-112-03, 0291-122-02	S 1/2 NW 1/4 Sec. 10, T1S, R3W SW 1/4 Sec. 10, T1S, R3W S 1/2 NE 1/4 Sec. 10, T1S, R3W NE 1/4 NE 1/4 Sec. 10, T1S R3W	315
Equalization Parcels	107-101	0291-112-03, 0291-121-01, 0291-122-05, 0291-122-04, 0291-122-03	S 1/2 NE 1/4 Sec. 10, T1S, R3W SW 1/4 Sec. 10, T1S, R3W N 1/2 W 20 AC S 1/2 SE 1/4 Sec. 10, T1S, R3W N 1/2 S 1/2 W 20 AC S 1/2 SE 1/4 Sec. 10, T1S, R3W S 5 AC W 20 AC S 1/2 SE 1/4 Sec. 10,	85

[4] The BLM has included the removal of the ACEC designation from approximately 40 acres leased for a gun range on Parcel 107-101 as part of the Proposed Action in order to correct an oversight in the 1994 SCRMP designation. No environmental consequences are expected from this aspect of the Proposed Action because the gun range was in existence prior to the 1994 SCRMP; therefore, the removal of ACEC designation from this parcel is not evaluated any further in this EIS.

Table 2.1 BLM Lands Proposed for Exchange (Selected Lands)				
	BLM SCRMP Parcel #	APNs	Legal Description	Acres
			T1S, R3W	

Source: San Bernardino County Assessor 2008.

Table 2.2 District Lands Proposed for Exchange (Offered Lands)				
	BLM SCRMP Parcel No.	Assessor's Parcel No. (APNs)	Legal Description	Acres
Core Exchange Parcels	Not applicable	0291-151-01, 0291-151-02, 0291-151-05	NW 1/4 Sec. 12, T1S, R3W NE 1/4 Sec. 12, T1S, R3W Sec. 12, T1S, R3W	320
Equalization Parcels	Not applicable	0290-271-03	SE 1/4 Sec. 9, T1S, R3W	60

Source: San Bernardino County Assessor 2008.

The land exchange would be completed pursuant to the authority of Section 206 of FLPMA and regulations contained in 43 Code of Federal Regulations 2200. FLPMA requires that the values of lands to be exchanged be equal or made equal by a cash payment. Additionally, any cash equalization payment cannot exceed 25 percent of the value of the lands being transferred out of federal ownership and should be reduced to the smallest amount possible.

DEAR GREG, November 10,2011

Understanding that public lands should be open and available to the public where warranted and manageable, I believe that the Marron Valley "Chicken Ranch" gate should continue to REMAIN LOCKED and or CLOSED TO VEHICLES..

There are already existing entrances that offer access to the public without encroaching on residences and already overcrowded two lane roads. There are four major entrances to this area I believe you have overlooked the importance of using one the other three. The three other include the Otay Lakes entrance, the "pink gate" entrance just east of the Border Patrol check point, and another behind the existing rod & gun club. These alternate entrances have the least impact on people that have homes nearby.

The idea of using the Chicken Ranch gate as a staging area to this area not only has a huge impact on the daily living of our entire community, it also has a severe and direct impact on people who are BLM neighbors. Of the four possible locations to this area, the "Chicken Ranch" gate has the highest population of houses and proximity to people. By keeping the Chicken Ranch gate closed and utilizing one of the other existing entrances you can ensure the ongoing safety of the Dulzura community while also providing public access to BLM open areas. Only in this way can you keep the majority of the hazardous traffic, hunting, sporting, and target shooting away from residential activities, families, pets and the children of this neighborhood.

Further, clear land/environmental abuse and violations are an ongoing problem in this area -even with the gate locked- which will only be more prevalent and harder for prevention/detection/citations and remediation. An increase in traffic will bring increase of shooting, which means an increased fire danger in an already hazardous wildfire area and to the properties and residences that are near this gate. One clear example of this is the fire we recently had on Marron Valley road by target shooters shooting at a propane tank on BLM property which caused a major fire here this year. Leftover trash, targets, discarded cans, signs, old furniture and yes even discarded propane tanks. These pollutants combined with the frequent off trail vehicle use destroy the native chaparral and ecosystem. This creates long term damage the very habitats which support the game prey, birds and open areas that hunters, shooters, hikers, naturalists and bird watchers are using BLM lands for.

Chicken Ranch gate should remain LOCKED or perhaps CLOSED TO VEHICLES (like the pink gate) to continue the necessary control and supervision needed to enforce the local law, BLM rules and safety of the community. These rules and continuing enforcement by BLM are crucial and necessary in ensuring that the land is capable of sustained use- which must be a condition for any public use of public lands.

Thank you,

oldchickenranch@gmail.com (Google Docs) <oldchickenranch@gmail.com>
Sent: Thu 11/10/2011 8:17 AM

BLM_CA_Palm_Springs_South_Coast_RMP

From: Leann Ortmann <wildlianas@gmail.com>
Sent: Thursday, November 10, 2011 2:16 PM
To: Hill, Gregory C
Subject: Please Support South Coast RMP Alternative B

Dear Gentlepersons:

I appreciate the opportunity to comment on the revised South Coast RMP. As a Southern California resident who values our natural resources, I wish to support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

However, there are significant shortcomings that cut across all the alternatives – including Alternative B. These should be addressed in the final RMP:

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- Fuel treatments, such as clearing and prescribed burning, have serious adverse biological consequences, such as conversion to weedy, flammable species. Treatments should occur only where effective – in strategic locations at the urban-wildland interface to create access points and fuel breaks for firefighting activities – and only as needed. A non-scientific, predetermined acreage target should be eliminated.

-Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.

-Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Southern California is both a biological diversity hotspot and an amazing place for ecotourism for both in-state, out-of-state, and international visitors. Protecting habitat is extremely important for flora and fauna as well as the economy. Support Alternative B and help keep Southern California wild and amazing.

Thank you for your agency's progress to date on this plan, and thank you for considering my views.

Sincerely,

Leann Ortmann

3733 Wilson Ave.

San Diego, CA 92104

--
Lianas are Woody Vines

BLM_CA_Palm_Springs_South_Coast_RMP

From: Steve Evans <sevans@friendsoftheriver.org>
Sent: Sunday, November 13, 2011 8:09 PM
To: Hill, Gregory C
Subject: Santa Margarita Wild & Scenic River
Attachments: SMR BLM WSR Background Final.pdf; SMR WSR Map.pdf

Hi Greg:

Thanks for chatting the other day about BLM's upcoming suitability decision for the Santa Margarita River.

Attached FYI is a briefing paper I developed to share with the City of Temecula and other potential partners on the river. It has been my experience that there is a lot of misinformation about Wild & Scenic Rivers and I think it useful to be as clear with people about what it means.

Also attached is a map of the multi-jurisdiction segment we would eventually like to see designated.

I'll be in touch soon.

Steve

Steven L. Evans
Wild Rivers Project Consultant
A Joint Project of Friends of the River
and the California Wilderness Coalition
P.O. Box 189717, Sacramento, CA 95818
Phone: (916) 708-3155
Email: sevans@friendsoftheriver.org
Web Site: www.friendsoftheriver.org
Web Site: www.calwild.org

Wild & Scenic Protection of the Santa Margarita River

Prepared by Steven L. Evans
Wild Rivers Project Consultant
Friends of the River and the California Wilderness Coalition
Phone: (916) 708-3155, Email: Sevans@friendsoftheriver.org
November 8, 2011

The Santa Margarita River is one of the few remaining free flowing rivers in southern California. There is virtually unanimous agreement that the river possesses important natural and cultural values, providing a variety of benefits to people. Given its relatively natural state in a rapidly urbanizing landscape, the river has a long history of controversy, including one of the oldest and longest water rights disputes in the state. But resolution of a number of controversies, along with ad hoc cooperation between several agencies that manage lands along the river may now provide an opportunity for overall protection for at least a small segment of the Santa Margarita River.

BLM's South Coast Resource Management Plan

In the June 1994 South Coast Regional Management Plan (RMP), the Bureau of Land Management (BLM) determined that segments of the Santa Margarita River flowing through federal public lands managed by the BLM were eligible for National Wild & Scenic River protection. The BLM made this determination in recognition of the river's free flowing character (one of the few such in southern California) and its outstandingly remarkable scenic, ecological, wildlife, and botanical values.

The National Wild & Scenic Rivers Act is the nation's foremost river conservation law. Congress passed the Act in 1968 to specifically balance our existing national policy of developing rivers for the water supply, hydropower, and flood control benefits with a new policy that preserves the free flowing character and outstanding natural and cultural values of other rivers for current and future generations. More than 2,000 miles of rivers and streams in California have been protected in the federal system.

Determining whether a stream is eligible for federal protection is the first step of a two step study process. The second step requires the agency that manages the public lands through which the river flows to determine whether an eligible stream is suitable. The purpose of the suitability step is to determine whether the river would be an appropriate addition to the federal system by considering tradeoffs between protection and no protection of the river. Suitability considerations include the environmental and economic consequences of designation and the manageability of a river. Federal agencies such as the BLM can recommend protection of an eligible and suitable river, but ultimately the decision as to whether or not the river should be protected in the federal system is made by Congress.

Since the BLM manages only a short segment of the Santa Margarita River, the agency did not complete the suitability study of the Santa Margarita River in its 1994 RMP. But in September 2011, the BLM released a draft revised South Coast RMP and is seeking public comments concerning the plan through December 23, 2011.

In the revised draft RMP, the BLM reiterates that the Santa Margarita River is eligible for federal protection and commits the agency to determining whether the river is suitable in the final RMP and Record of Decision (due out in 2012). The BLM will make this decision based on input from the public, adjacent landowners, and cooperating agencies. Consequently, interested parties have a short time period to make the case to the BLM that the Santa Margarita deserves federal protection as a Wild & Scenic River.

Cooperative Management & Protection

BLM lands encompass only about 1.15 miles of the ten-mile river segment between Interstate 15 and the eastern boundary of Camp Pendleton. Most of the remainder of the river in this segment is state land managed by San Diego State University and the California Department of Fish and Game, and public recreation lands owned by the Fallbrook Public Utilities District (FPUD) and managed by the Fallbrook Lands Conservancy. There is no question that all ten miles of the river between I-15 and Camp Pendleton, regardless of its current ownership and management, share the same unique free flowing character and outstanding values.

Several provisions of the National Wild & Scenic Rivers Act encourage the cooperative study and management of potential and protected rivers. For example, the study of potential rivers by federal agencies shall be pursued in "close cooperation with the appropriate agencies of the affected State and its political subdivisions" (Sec. 5[c]). Within three years after designation by Congress, the appropriate federal agency is required to develop a Comprehensive River Management Plan for the protected river, which shall be prepared "in consultation with State and local governments and the interested public" (Sec. 3[d][1]). In general, federal agencies shall "assist, advise, and cooperate with States or their political subdivisions, landowners, private organizations, or individuals to plan, protect, and manage river resources" (Sec. 11[b][1]). In addition, federal agencies "may enter into written cooperative agreements" to administer and manage rivers (Sec. 10[e]).

These cooperative study and protection provisions of the Act clearly set the stage for cooperative protection and management of the Santa Margarita River. But first, the BLM must find the river suitable and make a recommendation to Congress that it be protected in the federal system.

How Does Wild & Scenic Protect A River?

The key protective provisions of the National Wild & Scenic Rivers Act include:

- A prohibition on dams. First and foremost, designation by Congress prohibits on the designated river segment new dams, diversions, and other water resource projects that have a "direct and adverse effect" on the river's free flowing character and outstanding values. Water resource projects upstream and downstream of a designated segment are unaffected as long as the projects do not "unreasonably diminish" river values (Sec. 7[a-b]).

- Protection of free flowing character and outstanding values. Federal rivers shall be administered to protect and enhance the values which caused it to be included in the system, with a primary emphasis on protecting the river's aesthetic, scenic, historical, archaeological, and scientific values (Sec. 10[a]).

- General federal authority to protect rivers through regulations, policies, and plans. All federal agencies with jurisdiction over any lands in or adjacent to a protected river shall take action as necessary to protect such rivers in accordance with the Act (Sec. 12[a]).

- Protect and restore clean water. Federal agencies managing protected rivers shall cooperate with the EPA and state water pollution control agencies for the purposes of eliminating or diminishing water pollution (Sec. 12[b]).

- Establish a river corridor and segment classifications. The managing federal agency is required within one year of designation to classify and manage river segments as Wild, Scenic, or Recreation based on the current level of development and establish a river corridor averaging 320 acres per mile (Sec. 3[b]).

- Develop a Comprehensive River Management Plan to provide for the protection of river values. To be completed within three years of designation, the plan shall address resource protection, development of lands and facilities, user capacities, and other management practices needed to achieve the purposes of the Act (Sec. 6[d][1]).

Based on the Act's existing protection provisions and specific measures that summarize existing rights and jurisdictions, federal protection of the 10 mile segment of the Santa Margarita River between I-5 would not affect the Bureau of Reclamation's proposed Santa Margarita River Conjunctive Use Project, particularly since the FPUD lands are intended as mitigation lands for conjunctive use project in Camp Pendleton and because the Bureau intends to assign part of its water right to maintain instream flows in the river. In addition, the proposed conjunctive use

project is several miles downstream of the segment proposed for protection and would easily avoid "unreasonable" diminishment of river values.

It is also clear that Wild & Scenic protection of the river will not affect the existing authority of the San Diego State University Reserve, California Department of Fish and Game, and FPUD to manage their lands as they see fit. Designation would not declare the BLM to be the manager of other agency lands on the river. The river could be collaboratively managed through cooperative management agreements between the appropriate agencies. Wild & Scenic protection can provide additional federal resources for the cooperative management and protection of the river.

What Does Wild & Scenic Not Do?

There is a lot of misinformation about what Wild & Scenic protection means. Wild & Scenic protection will not:

- Affect adjudicated water rights. The Act explicitly states that the State retains jurisdiction of water rights as determined by established principles of law (Sec. 13[b-d]).

- Affect State jurisdiction with respect to fish and wildlife. The Act states that hunting and fishing is subject to applicable state law and regulations (Sec. 13[a]).

- Affect private property rights or local land use regulations. The Act grants no federal authority over private property or local land use regulations. Incorporated cities are encouraged to adopt local ordinances that conform to the purposes of the Act (Sec. 6[c]), but the only federal authority to address inappropriate local land use on private land is condemnation, which in the case of the Santa Margarita River, is severely limited (see below).

- Increase existing federal authority for the fee title condemnation of private land. In the specific case of this 10-mile segment of the Santa Margarita River, the Act specifically prohibits fee title condemnation of private lands because more than 50% of the river corridor is already public (Sec. 6[b]). However, condemnation of scenic or public access easements is allowed.

- Affect the existing rights of the State, including the right of access to the beds of navigable streams, tributaries, or rivers (Sec. 13[f]).

- Affect valid existing mining rights, although federal agencies may issue regulations to provide safeguards against pollution of the river and impairment of its scenery (Sec. 9[a][i-iii]).

- Abrogate any existing rights, privileges or contracts affecting federal lands held by a private party (Sec. 12[b]).

The Next Step

The BLM is seeking public comments in response to the draft revised South Coast RMP through December 23, 2011, and specifically, the agency is seeking input about whether it should find the Santa Margarita River suitable for Wild & Scenic protection and recommend its designation by Congress. Now is the time for all affected agencies, including the City of Temecula, California Department of Fish and Game, San Diego State University Reserve, and the Fallbrook Public Utilities District to step forward and let the BLM know what they think about protecting the Santa Margarita River in the nation's foremost river conservation system.

From the draft revised South Coast RMP and BLM web site:

The purpose of the suitability step of the study process is to determine whether the river would be an appropriate addition to the national system by considering tradeoffs between protection of the river, or no protection of the river. Suitability considerations include the environmental and economic consequences of designation and the manageability of a river if it were designated by Congress.

Public comment received on the Draft EIS/RMP and information received from coordination meetings with adjacent landowners and cooperating agencies will be used to improve the documentation of the suitability considerations presented below, as well as the documentation of impacts that would result from the various alternatives. The actual determination of whether or not each eligible river segment is suitable is a decision that will be made in the Record of Decision for the South Coast Resource Management Plan Revision (RMPR).

On September 23, 2011 the Bureau of Land Management released for public comment a Draft South Coast Resource Management Plan (RMP) Revision and Draft Environmental Impact Statement (EIS) this initiates a public comment period of 90 days, ending **December 23, 2011**.

Please submit comments to the following:

Email - capsscrmp@blm.gov

Fax - (760) 833-7199

Electronic (on CD-ROM) or paper copies and further information may also be obtained by contacting Greg Hill, BLM Palm Springs-South Coast Field Office, 1201 Bird Center Drive, Palm Springs, CA 92262; (760) 833-7140; or Greg_Hill@blm.gov

BLM_CA_Palm_Springs_South_Coast_RMP

From: joan herskowitz <jmherskowitz@yahoo.com>
Sent: Monday, November 14, 2011 10:36 AM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and EIS

November 14, 2011

South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
Sent by email to: <Greg_Hill@blm.gov>

RE: Comments on South Coast Draft Resource Management Plan and Environmental Impact Statement

Dear Sir/Madame:

I am writing on behalf of the Buena Vista Audubon Society with a membership of 1,800 households predominately in the northern part of San Diego County. We support Alternative B, the Conservation Alternative which provides ample public access and continued consumptive uses while protecting our stressed biological systems. It also better supports the very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

However, there are significant shortcomings in all the alternatives which should be addressed in the final RMP:

- Fuel treatments should occur only where effective – in strategic locations at the urban-wildland interface to create access points and fuel breaks for firefighting activities – and only *as needed*. A non-scientific, predetermined acreage target should be eliminated.
- Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.
- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering our views on this matter.

Sincerely,

Joan Herskowitz
Conservation Committee Co-Chair
Buena Vista Audubon Society
P.O. Box 480
Oceanside, CA 92049

BLM_CA_Palm_Springs_South_Coast_RMP

From: Gary Anderson <g.anderson1@cox.net>
Sent: Friday, November 18, 2011 12:40 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: BLM Draft RMP/EIS reply

This reply is in regards to the proposed wilderness area of El Cajon Mountain. From what I can gather, the wilderness designation means that no human activity can occur within this zone. From the maps that I've seen, it looks like randomly selected boundaries were drawn. Of particular interest was the line drawn on the southeast boundary of the El Cajon Mountain. This boundary line comes from the top of El Cajon Mountain towards El Captain Reservoir in the valley that is created by El Cajon Mountain. The proposed boundary would include a very popular hiking trail which goes up the ridge line of El Cajon Mountain from the south. It would make much more sense to put the boundary line up this ridge line which is an obvious natural feature and easily identified. My hope is that the trail up the mountain would still be outside the wilderness area so hikers could still enjoy this challenging trail to the top of El Cajon Mountain and take in the spectacular views. Also, the east side of El Cajon Mountain offers excellent rock climbing on the granite slabs covering the hillside. Having climbed in this area for many years, I know the value of having a resource like this for recreational activites. This east side does not have any nesting raptors nor have I seen any nests in the years I have been climbing there. As you are aware, several other climbing cliffs like Eagle Peak and Corte Madera have nesting raptors and seasonal restrictions which we as climbers adhere to. The El Cajon Mountain area therefore offers rock climbers an alternative venue during prime climbing season so as not to interfere with nesting raptors in other areas. If ever a raptor were to nest in this area, we report that to the appropriate experts and we post a notice of closure to that section of cliff on the ACSD website. This area is vast enough that a closure would not significantly impact the ability to climb in another sector. The boundary line now proposed takes away almost all of this climbing area and it would be impossible for anyone to determine what is off limits or what is not. Thanks for your consideration and please e-mail me if you have any further questions or concerns.
Gary Anderson g.anderson1@cox.net 760 945-0450

BLM_CA_Palm_Springs_South_Coast_RMP

From: Charlotte Pirch <dpirch@socal.rr.com>
Sent: Friday, November 18, 2011 5:14 PM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and EIS

South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262

RE: South Coast Draft Resource Management Plan and Environmental Impact Statement

Gentlepersons:

I appreciate the opportunity to comment on the revised South Coast RMP.
As a Southern California resident who values our natural resources, I wish to support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which balance environmental, public access and economic goals.

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Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.

Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering my views.

Sincerely,

Charlotte Pirch
9826 Lewis Avenue
Fountain Valley, CA 92708
dpirch@socal.rr.com

BLM_CA_Palm_Springs_South_Coast_RMP

From: Jill McCormick <culturalres@cocopah.com>
Sent: Monday, November 21, 2011 2:32 PM
To: Hill, Gregory C; Kline, George E
Subject: Palm Springs-South Coast Field Office Draft Resource Management Plan and Environmental Impact Statement

Importance: High

This email is to inform you that we wish to make no comments on the project at this time. We defer to the more local tribes and support their decisions on the project.

H. Jill McCormick, M.A.
Cultural Resources Manager
Cocopah Indian Tribe
14515 S. Veterans Dr.
Somerton, AZ 85350
Cell: 928-503-2291
Office: 928-627-4849

BLM_CA_Palm_Springs_South_Coast_RMP

From: Mike and Susan Garcia <mandsgarcia55@cox.net>
Sent: Wednesday, November 23, 2011 3:27 PM
To: Hill, Gregory C
Subject: Draft Resource Management Plan Revision PUBLIC COMMENT

November 23, 2011

Mr. Greg Hill, RMP Team Lead
Greg_Hill@blm.gov
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262

Subject: Bureau of Land Management's (BLM) Draft Resource Management Plan Revision (MPL) and Draft Environmental Impact Statement for the South Coast Planning Area.

Dear Mr. Hill:

I am writing on behalf of the San Diego Sport Dog Trackers (SDSDT) membership. Our members are throughout southern California, which includes San Diego, Riverside, Orange, and Los Angeles counties.

Tracking is the foundation of canine search and rescue teams; similarly dogs that have been trained to recognize and detect a specific scent provide service to the military, US Customs/Border Patrol, and law enforcement.
Tracking is a canine sport that demonstrates a dog's natural ability to recognize and follow a scent and is the foundation of canine search and rescue work. Are dogs must be on a leash and the handler's activity is that of hiking.

A few times a year in the winter months, we come together in organized very small groups to evaluate our dogs' abilities to track/trail a particular scent.

Our interest is related to the Draft Resource Management Plan Revision is the recreation component. Our current use meets the BLM's criteria for waiving a Special Recreation Permit as stated in the BLM Special Recreation Permit Information Booklet, page 7 item (c).

As stated in the Tips for Reviewing and Commenting on the Draft RMP/Draft EIS

Do we need to clarify any of the potential decisions? If so, which?

The SCRMP established three Special Recreation Management Areas with emphasis on providing for public safety, legal access, developed recreation sites, and trail systems, while protecting the area's natural resource values

For clarification, which areas are in San Diego County are specified as recreation areas? Is the Sycamore Canyon area considered as a recreation area?

Will the process to obtain a Special Recreation Permit waiver remain the same as identified in the BLM Special Recreation Permit Information Booklet?

Lastly, please provide the local media and website where notices related to the public hearings are disseminated.

Sincerely,

Susan Garcia, President
San Diego Sport Dog Trackers

BLM_CA_Palm_Springs_South_Coast_RMP

From: Michael Kaul <michael.kaul@gmail.com>
Sent: Monday, November 28, 2011 2:19 PM
To: Hill, Gregory C
Subject: Marron Valley rd BLM consideration
Attachments: Dear BLM with dust.docx

Michael, Deylon, Taylor & Ashton Kaul

1239 Marron Valley Road

Dulzura, CA 91917

Dear BLM,

I understand public lands (BLM) should be "open and available" to the public- where warranted and manageable. But after living here for over 20 years I am convinced that the Marron Valley "Chicken Ranch" gate should continue to REMAIN LOCKED.

I know there are other existing entrances that offer access to the public without encroaching on residences and already overcrowded two lane roads. There are four major entrances to this area I believe you have overlooked the importance of using one the other three. The three other include the Otay Lakes entrance, the "pink gate" entrance just east of the Border Patrol check point, and another behind the existing rod & gun club. These alternate entrances have the least impact on people that have homes nearby.

The idea of using the Chicken Ranch gate as a staging area to this area not only has a huge impact on the daily living of our entire community, it also has a severe and direct impact on people who are BLM neighbors. Of the four possible locations to this area, the "Chicken Ranch" gate has the highest population of houses and proximity to people. ROAD DUST: All of the extra traffic will increase an already severe problem for the area- road dust. Our homes, yards, pets and children are already exposed to choking amounts of dust from the constant daily activities of the Border Patrol vehicles, adding to this would be an incredible burden on the longtime residents of our community. By keeping the Chicken Ranch gate closed and utilizing one of the other existing entrances you can ensure the ongoing safety of the Dulzura community while also providing public access to BLM open areas. Only in this way can you keep the majority of the hazardous traffic, hunting, sporting, and target shooting away from residential activities, families, pets and the children of this neighborhood.

Further, clear land/environmental abuse and violations are an ongoing problem in this area -even with the gate locked- which will only be more prevalent and harder for prevention/detection/citations and remediation. An increase in traffic will bring increase of shooting, which means an increased fire danger in an already hazardous wildfire area and to the properties and residences that are near this gate. One clear

example of this is the fire we recently had on Marron Valley road by target shooters shooting at a propane tank on BLM property which caused a major fire here this year. Leftover trash, targets, discarded cans, signs, old furniture and yes even discarded propane tanks. These pollutants combined with the frequent off trail vehicle use destroy the native chaparral and ecosystem. This creates long term damage the very habitats which support the game prey, birds and open areas that hunters, shooters, hikers, naturalists and bird watchers are using BLM lands for.

Chicken Ranch gate should remain LOCKED to continue the necessary control and supervision needed to enforce the local law, BLM rules and safety of the community. These rules and continuing enforcement by BLM are crucial and necessary in ensuring that the land is capable of sustained use- which must be a condition for any public use of public lands.

Thank you,

Michael Kaul & Family

Michael, Deylon, Taylor & Ashton Kaul
1239 Marron Valley Road
Dulzura, CA 91917

Dear BLM,

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I know there are other existing entrances that offer access to the public without encroaching on residences and already overcrowded two lane roads. There are four major entrances to this area I believe you have overlooked the importance of using one the other three. The three other include the Otay Lakes entrance, the "pink gate" entrance just east of the Border Patrol check point, and another behind the existing rod & gun club. These alternate entrances have the least impact on people that have homes nearby.

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Chicken Ranch gate should remain LOCKED to continue the necessary control and supervision needed to enforce the local law, BLM rules and safety of the community. These rules and continuing enforcement by BLM are crucial and necessary in ensuring that the land is capable of sustained use- which must be a condition for any public use of public lands.

Thank you,
Michael Kaul & Family

BLM_CA_Palm_Springs_South_Coast_RMP

From: Missy Cardenas <missycardenas@yahoo.com>
Sent: Wednesday, November 30, 2011 4:13 PM
To: Hill, Gregory C
Subject: RMP regarding Marron Valley Rd

Dear Mr. Hill,

It is my understanding that decisions are to be made sometime this December by the BLM with regards to where the gate(s) will be open for public access staging area. One of these areas open for consideration is on Marron Valley Road in Dulzura across from the old chicken ranch. I live 100 feet or so to the South of this gate and am asking you to please take into consideration how this would impact the residence in and around this area before making your final decision. There are three things that concern me most; they are extreme dust, the extra traffic in would bring to our neighborhood, and the early morning noise on the weekends. All of which by the way will bring all of our property values down, as an added bonus.

The dirt on these hills and trails is extremely fine and easily disturbed. Any vehicle on these roads kick up huge dust clouds (especially in the dry months), which then wafts our direction where many residents live, including homes on Community Building Road. And we all pretty much know the health hazards related to extreme dust. The occasional vehicle/ motorcycle out on the trails are one thing, but **all** of them taking off and returning across the street from is entirely different.

The extra traffic it would bring to the area is mostly a safety issue. Many of us enjoy walking, jogging, and horseback riding, and riding bikes on Marron Valley Road. These activities are already a bit compromising due to the current traffic flow of Border Patrol, National Guard, and fun club patrons, which include the Navy and the Highway Patrol. Add to that, the traffic this staging area would create and you have a recipe for someone to get injured or worse.

The last area of concern is the issue of early morning and weekend noise, motorcycle noise to be exact. The last time this area was opened up to this sort of thing was about 4-5 years ago (I think), anyway at some point in the recent past we had motorcycles riding all over the place across the street and on the street. I do not know what events occurred that allowed for this type. All I know is that it was loud early (6am) and on weekends mostly. It was like living next to an off road track. Would you like to live next to or near what sounds like an off road track?

In conclusion I am once again asking you to consider how this would affect those living in and around Marron Valley Road. Could you please put this public access staging area somewhere that has a minimal population? Maybe east of the Border Patrol check point- the orange gate.

Sincerely,
Michelle R. Cardenas
Marron Valley Road Resident

P.S. - Could you please E-Mail me back? I would like to know about any public meetings with regards to this issue.

BLM_CA_Palm_Springs_South_Coast_RMP

From: John Elliott <jdejr@cts.com>
Sent: Tuesday, December 06, 2011 12:31 PM
To: Hill, Gregory C
Subject: RE: south coast plan revision
Attachments: ATT00124.htm

Greg,
I have been evaluating the new plan's transportation element. The text indicates general reasons why certain management decisions are being made but the charts do not indicate which reasons were used for the individual routes. An example would be a closure restricting access for administrative use only because of lack of easement access vs a closure for environmental purposes. Do you have a better breakdown on the decision making rational?
Thanks,
John Elliott
(619)445-5011
(619)445-1983
jdejr@cts.com

-----Original Message-----
From: gchill@blm.gov [mailto:gchill@blm.gov]
Sent: Tuesday, August 09, 2011 9:25 AM
To: jdejr@cts.com
Subject: RE: south coast plan revision

John,
Attached is a copy of the MOU between BLM and other agencies and local governments for cooperation in habitat conservation and planning. This is also included as an Appendix to the Draft South Coast Resource Management Plan Revision. The BLM continues to work within the framework of the MOU to cooperate in land acquisitions and conservation of habitat to meet the objectives of the MSCP. Evaluation of the plan occurs on an annual basis and these reports can be found on the San Diego County MSCP website at
http://www.sdcounty.ca.gov/dplu/mscp/index.html

Greg Hill
Planning & Environmental Coordinator
BLM Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
(760) 833-7100

"John Elliott" <jdejr@cts.com>
08/09/2011 09:04 AM Please respond to
<jdejr@cts.com>

Santa Margarita River

Proposed Wild & Scenic River Segments

FRIENDS OF THE RIVER

Proposed Designation:

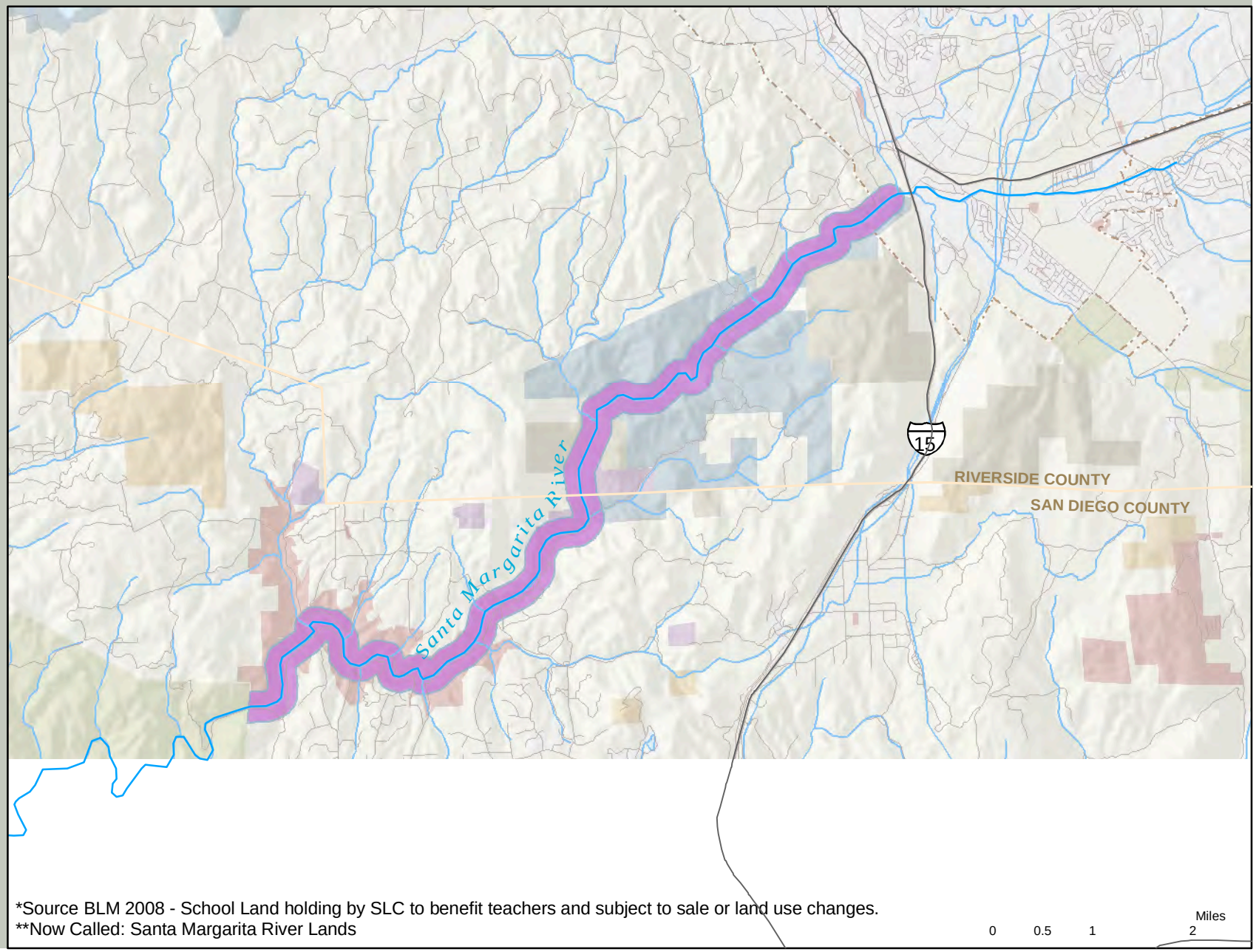
- Wild
- Scenic
- Recreational

Land Ownership:

- United States Forest Service
- U.S. Department of Defense
- Bureau of Land Management
- State
- Local
- Private Conservation
- US Bureau of Reclamation

Boundaries

- Forest Service Administrative Area
- Forest Service Wilderness Area
- County
- City



*Source BLM 2008 - School Land holding by SLC to benefit teachers and subject to sale or land use changes.
**Now Called: Santa Margarita River Lands

Map created by GreenInfo Network
www.greeninfo.org

To <gchill@blm.gov>
cc
Subject RE: south coast plan revision

So the BLM has not done a formal evaluation of the MSCP plan? Wasn't that a requirement of the MOU? I was hoping the attachment was a copy of the MOU but it was not. Could you forward me a copy?
Thanks,
John Elliott
-----Original Message-----
From: gchill@blm.gov [mailto:gchill@blm.gov]
Sent: Tuesday, August 09, 2011 8:51 AM
To: jdejr@cts.com
Subject: RE: south coast plan revision

John,
As requested, we will send you a paper copy of the plan when it is printed. The plan will include a copy of the MSCP as an appendix. The MSCP is evaluated on a yearly basis by the State, US Fish and Wildlife Service, San Diego County and the cities that are participants in the plan. An annual public meeting and an annual report present the accomplishments and these can be accessed through the County's MSCP website. The reports also include BLM's accomplishments. The link to the MSCP website is:

http://www.sdcounty.ca.gov/dplu/mscp/index.html

Greg Hill
Planning & Environmental Coordinator
BLM Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
(760) 833-7100

"John Elliott" <jdejr@cts.com>
08/08/2011 05:25 PM Please respond to
<jdejr@cts.com>

To <gchill@blm.gov>
cc
Subject RE: south coast plan revision

Gregg,

Just a couple of things. Seems I cannot find my copy of the BLM's MOU with the MSCP signatories. Could forward me a copy? Has the BLM ever completed an
evaluation of the MSCP plan per the MOU? If so could you also forward me those findings? Also, what are the chances of getting a copy of the plan revision in a print form?

Thanks again,

John Elliott

(619)445-5011

(619)445-1983

jdejr@cts.com

-----Original Message-----
From: gchill@blm.gov [mailto:gchill@blm.gov]On Behalf Of capsscrmp@ca.blm.gov
Sent: Tuesday, July 19, 2011 9:26 AM
To: jdejr@cts.com
Subject: Re: south coast plan revision

John,
Sorry for the confusion. This mailer was to give us an idea on how many to print. It has not been printed or released, but will be shortly. The plan will be posed on our website and CDs will be mailed on the same day that the Notice of Availability is published in the Federal Register, which
starts the 90 day review period. Thank you for your interest in the Draft South Coast Resource Management Plan Revision.

Greg Hill

"John Elliott" <jdejr@cts.com>
07/16/2011 12:33 PM Please respond to
<jdejr@cts.com>

To <capsscrmp@ca.blm.gov>
cc
Subject south coast plan revision

When will the draft rmp and eis be posted on your web site? I have looked and cannot find it.
Thanks,
John Elliott

BLM_CA_Palm_Springs_South_Coast_RMP

From: Richard Adams <adamscrest@aol.com>
Sent: Tuesday, December 06, 2011 3:39 PM
To: Hill, Gregory C
Subject: SCRMP - Draft Reports - Map Status for Chihuahua Valley and Beauty Mountain Area

Greg Hill,

I have interacted with the BLM Palm Springs/SouthCoast Field Office for decades, primarily as a representative of the Sky Oaks Ranch and also the Rocking W Ranch. They are adjacent ranches at the east end of Chihuahua Valley in the North Mountain Planning Area of San Diego County. l very interested in the existing and future plans for the specific area of Chihuahua Valley and how it relates and may relate to the growing BLM Beauty Mountain areas in San Diego County. We are still major property owners in east Chihuahua Valley.

Beginning in the early 1980's the Adams family invited San Diego State University (SDSU) to consider conducting research and education in the area adjacent to the western boundary of Anza Borrego Desert State Park. **SDSU later established the Sky Oaks Biological Field Station on the BLM 40-acre parcel - APN: 116-050-04.** In the later 1990's we gifted 160-acre Combs Camp area to SDSU Research Foundation (APN: 117-110-01) - around the same time SDSU was written up and photographed in Fortune Magazine (Dec 8, 1997) for the global warming experiments they were conducting at the Sky Oaks Biological Field Station (primarily on BLM land). SDSU then acquired an additional 200-acre Sky Oaks Parcel APN: 116-050-02 from the Sky Oaks Ranch. SDSU also entered into lease agreement(s) with BLM for roughly 1200-acres adjacent to (presumably) expand their environmental studies.

Fast forward to the last 5 years and you are likely aware of the new BLM acquisitions from the Sky Oaks Ranch (Adams Family) and the Rocking W Ranch (Mason Family) through The Conservation Fund. The owners worked with Scott Eubanks from the BLM Desert District Office in Moreno Valley and Scott Ferguson out of Laguna Beach Southern California Office of The Conservation Fund headquartered in Arlington, Virginia. San Diego County refers to the 2100-acres of new BLM lands as Conservation Open Space (C-OS) - I do not know how BLM refers to them. The 2100-acres (1120-acres from Sky Oaks Ranch and 980-acres from Rocking W Ranch) combined with SDSU's (360-acres from Sky Oaks) identifies 2460 acres of what I refer to as the *Headwaters* of the **San Luis Rey River**.

I hope this background helps place in context my questions that I describe below about the maps and plans associated with the updating of your RMP. I thank you in advance for your assistance. I would be happy to discuss any of these matters on the phone, or could arrange to visit your office prior to the end of the RMP public review period.

<u>I have noticed, to the extent that the Draft maps are legible in our area, that it appears that:</u>

1. NO DRAFT MAPS for east Chihuahua Valley **show any of the recent TCF acquisitions as BLM lands** or as Conservation Open Space (C-OS):

- **Rocking W 980-acre C-OS completed through The Conservation Fund in April 2008.**
- **Sky Oaks East 720-acre C-OS completed through The Conservation Fund, 200-acres in 2009, and 520-acres in 2010.**
- **Sky Oaks West 400-acre C-OS completed through the Conservation Fund in July 2011.**

WILL THESE ADDITIONS BE MAPED INTO THE FINAL RMP? (Hopefully, "yes" to be current).
WILL LARGER SCALE MAPS BE AVAILABLE, FOR ALL THE CHANGES IN CHIHUAHUA VALLEY? (Preferably USGS).

2. THE BOUNDARIES OF THE JOHNSON CANYON **ACEC** in East Chihuahua Valley are unclear.

- It is the understanding of the private property owners in the area that an ACEC affects public property, not any rights on private property.
- With the C-OS lands added to BLM in 1. above, the owner's of Sky Oaks Ranch and Rocking W Ranch thought that those additions would define the new ACEC.

CAN YOU CONFIRM?
CAN THE ACEC BE MODIFIED ACCORDINGLY?

3. The BEAUTY MOUNTAIN MANAGEMENT AREA (BMMA) is relatively new with elements formerly only in Riverside County, up to the San Diego County line.

- Now BMMA spills into San Diego County and boundaries are unclear - parts appear to be in the northwest portion of Chihuahua Valley.
- BMMA has one set of regulations; BEAUTY MOUNTAIN WILDERNESS (BMW) adds another; and, BMMA ACEC another - unclear boundaries hamper understanding Planning detail.
- Expansion of BMW has recently proposed by Rep (R) Issa and Senator (D) Boxer and the proposed new boundaries are unclear; and, if there are any other possible additions.

CAN BLM SHOW BOUNDARIES OF (PROPOSED & EXISTING) ACECs, BMMAs, BMWs, etc. on a larger scale map to ease identification?

WILL THE BMMA EXPAND TO INCLUDE EVERYTHING SOUTH TO CNF ? (and ABDSP to the east) THAT BLM CONTROLS? i.e. Chihuahua Valley?
BLM has recently increased presence in Chihuahua Valley through separate infill acquisitions in the northern water-shed of the valley - and those boundaries are unclear. BLM now owns the majority of Chihuahua Valley - Bounded by ABDSP to the east and CNF to the south.
Therefore, IS CHIHUAHUA VALLEY BECOMING A DISTINCT ENOUGH AREA - HEADWATERS OF THE SAN LUIS REY RIVER etc. - to be a separate planning area?

WHEN WILL A NEW MAP SHOW ALL OF BLM HOLDINGS WITHIN THE CHIHUAHUA VALLEY WATERSHED? AND WILL IT BE INCORPORATED INTO THE NEW (Final) RMP?

I have always tried to respect and protect the environment (in east Chihuahua Valley since 1960), while at the same time recognize the economic, recreation, and social needs of residents and visitors.

I offer a few general comments to the BLM Draft RMP/EIS with respect to Chihuahua Valley:

1. Advocate appropriate access and use of RS 2477 roads and trials. Responsible residents and their guests should not be restricted,
since they would be able to help local monitoring and report anomalies appropriately.

2. Strongly support hiking, horseback riding, birding, photography, nature activities, etc.

3. OHV do not belong on Chihuahua Valley public lands.

4. Hunting with firearms, shooting, and target practice should not be allowed on Chihuahua Valley public lands.

Sincerely,

Richard Adams

RICHARD C. ADAMS
2565 ARDATH ROAD
LA JOLLA, CA 92037
AdamsCrest@aol.com
Tel: 858-454-3430 Fax: 858-454-8868 Mbl: 619-306-3515

BLM_CA_Palm_Springs_South_Coast_RMP

From: TFKing106@aol.com
Sent: Tuesday, December 06, 2011 4:07 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Comments on South Coast DRMP and DEIS
Attachments: Comment on S Coast RMP and EIS 12-6-11.pdf

Attached are my comments on the South Coast draft revised resource management plan (DRMP) and draft environmental impact statement (DEIS).

Thank you for the opportunity to comment.

Thomas F. King

Thomas F. King, PhD
PO Box 14515, Silver Spring MD 20911
240-475-0595
TFKing106@aol.com
Blog: http://crmplus.blogspot.com/
Recently published by Wiley-Blackwell: ***Companion to Cultural Resource Management;*** see http://www.wiley.com/WileyCDA/WileyTitle/productCd-1405198737.html
Recently published by Dog Ear Publishing: *Thirteen Bones.* See www.tomfking.com.
Recently published by Left Coast Press: *Our Unprotected Heritage: Whitewashing Destruction of Our Natural and Cultural Environment*. February 2009, see http://www.lcoastpress.com/book.php?id=219

Thomas F. King, PhD
PO Box 14515, Silver Spring MD 20911, USA
Telephone (240) 475-0595 Facsimile (240) 465-1179
tfking106@aol.com, http://crmplus.blogspot.com/

Training, writing, consultation, dispute resolution in cultural resource & heritage management, environmental impact assessment

December 6, 2011

Mr. John R. Kalish
Field Manager
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish:

I am writing to comment on the Draft Resource Management Plan Revision (Plan) and Draft Environmental Impact Statement (EIS) for the South Coast Planning area. Although I have perused the entire document, my specific concerns are with Section 3.9 of the Plan, which ostensibly deals with "Cultural Resources." My reading of this document raises a number of questions, to which I request specific answers.

1. What is the basis for your definition of "cultural resources," with its emphasis on "places" and "specificity?" What in particular is the basis for your statement that "cultural resources are concrete, material places and things?" I am aware of no statutory or regulatory basis for such a narrow, materialistic (one might even say Marxist) definition; can you please direct me to the source from which it is derived?
2. How do you square the above narrow, materialist definition with your citation of legal authorities like the American Indian Religious Freedom Act and the Religious Freedom Restoration Act?
    a. Is it your understanding that spiritual values are "concrete, material places and things?"
    b. Or do you not regard spiritual values as "cultural resources?"
    c. Did you, then, just throw in references to AIRFA and RFRA for fun?
3. Does not your definition of "cultural resource" effectively exclude most of the environment's cultural aspects?
4. If you think not, what is the basis for your thinking?
5. Why are "traditional values" that "may not be identified with definite locations" discussed in this section, since by your definition they clearly cannot be "cultural resources?"
6. You propose that such "traditional values…not …identified with definite locations," are "taken into account through public participation during planning

and environmental analysis or through tribal consultation." This begs several questions:

   a. What is a "definite" location?
   b. How "definite" must it be?
   c. Who defines definiteness?
   d. Do you mean "public participation" to include or exclude consultation pursuant to the regulations (36 CFR 800) implementing Section 106 of the National Historic Preservation Act?

7. What does it mean to be "inventoried for cultural resources?" Accepting for the sake of argument your (as far as I know baseless) materialist definition of "cultural resources," does such inventory include:
   a. Identification of archaeological sites?
   b. Identification of historic buildings and structures?
   c. Identification of traditional cultural properties?
   d. Identification of culturally valued landscape elements such as water bodies, springs, rock outcrops and groves of trees?
   e. Identification of cultural landscapes, including traditional cultural landscapes?
   f. Identification of culturally significant plants, animals, and minerals?
8. Assuming for a moment that culture includes some non-physical aspects of the environment, does your "inventory" include:
   a. Identification of cultural and spiritual values attached to the land, to viewsheds, and/or to water or air quality?
   b. Identification of cultural and spiritual values attached generally to the landscape and natural environment?
   c. Identification of tribal and other spiritual beliefs about the environment?
   d. Cultural associations with iconic animals and plants?
9. You report that your "inventory" has recorded 744 "archaeological sites," suggesting that the "inventory" includes at least the types of resources noted in question 7(a) above. What about all the other kinds of cultural resources listed at least under 7 above, if not under 8?
10. If you have not "inventoried" any of these other kinds of cultural resources, how can you call what you have done a "cultural resource inventory?"
11. And if you have not "inventoried" all kinds of cultural resources, what good is the "inventory" you have?
12. What does a "Class III, intensive pedestrian, cultural resources inventory" entail?
13. What is a "route of travel?" A road?
14. If so, does the statement that your contractor, ECORP, did a "Class III intensive pedestrian inventory along routes of travel" mean that its people just walked along the road looking for things?

15. If that is not what it means, what does it mean?
16. Sections 3.9.1, 2 and 3 present tribal and other cultural uses of the area as things of the past. This raises several questions:
    a. Are the tribes of the area all extinct?
    b. Are the Hispanic and other immigrant populations that have lived in the area also extinct?
    c. If not, why are they discussed only in the past tense?
    d. If they survive, why is there no discussion of their current involvement with the land and its resources?
17. Section 3.9.4.3 repeats your definition of "cultural resources" as "concrete, material places and things." Again, can you provide any statutory, regulatory, or even logical authority for this definition? Or have you simply made it up?
18. If you have made it up, what is your authority for doing so?
19. Section 3.9.4.4 on "Traditional Native American Values" ascribes such values only to Tecate and Little Tecate Peaks, and to basket making materials. This section raises several questions:
    a. Even adopting your narrow, materialist definition of "cultural resource," on what basis do you assume that Tecate and Little Tecate Peaks and basket making materials are the only "concrete, material places and things" of cultural value to Native Americans?
    b. Have you consulted with Native Americans about the cultural values they may ascribe to these places and things, or to others?
    c. Indeed, have you consulted with Native Americans, or even with federally recognized tribal governments, at all? I see no evidence of it either in the Plan or in the EIS. Perhaps this is consistent with Sections 3.9.1, 2, and 3; it would of course be unreasonable to consult with people who are all dead.
    d. What about the traditional cultural values of <u>non</u>-Native Americans, some of whom surely are still alive in the area. Since such values are not addressed, may we assume that such people have no such values? No culture?
    e. A number of people in the area have contacted me with concerns about the cultural values they say they ascribe to wild horses and burros in the area, and specifically to the erstwhile Coyote Canyon herd. Since such concerns are not addressed in the Plan or the draft EIS, I must assume that one of the following is true:
        i. I have been hallucinating;
        ii. The people who have contacted me are liars, or mad;
        iii. You are somehow unaware of these people's concerns; or

iv. You do not regard them as worthy of addressing in the Plan and draft EIS.

f. Can you please advise me as to which of the above options is accurate?

Thank you for your attention to these comments. I look forward to your answers to my questions.

Sincerely,

BLM_CA_Palm_Springs_South_Coast_RMP

From: Kathleen Hayden <kats@znet.com>
Sent: Wednesday, December 07, 2011 9:12 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP; Hill, Gregory C
Cc: BLM Jan Bedrosian; BLM Tom Pogacnik; Hendron, Jane
Subject: Comments on Southcoast rmp
Attachments: Equus Survival Trust. LISTS CC HORSES CRITICAL EXTINCT.eml; Southcoast comments.docx; Dr. TF Kings Comment on S Coast RMP and EIS 12-6-11.PDF

Dear Greg,
Attached are my comments to be included in the S Coast RMP and EIS. Please acknowledge receipt of docs listed.
Most recent notice from Equus Survival was received this morning. Comments from Russ Kaldenberg forthcoming to be included.
Thank You,
Kathleen Hayden

Good morning Kathleen,

I am pleased you have been persistent and provided such good information. You are a credit to the stewardship of the horses you love so dearly. I have carefully reviewed what you have sent, including Dr. Bennett's passages. I recommended that we add the Coyote Canyon wild horses to our Conservation list as a strain of Colonial Spanish Mustangs. They are both worthy and needy. Their official listing will be Critical/Nearly Extinct.

We are adding the Coyote Canyon Caballos d Anza Inc (CCCDA) to our list of Affiliate Member associations. This will renew automatically annually at no charge. Such membership gives you a collective voice (non voting) through the Equus Survival Trust and includes you in any appropriate mailings or educational articles. In exchange we would ask to be put on your mailing list, kept apprised of your work and the status of the Coyote Canyon horses, but we require no voting privileges for EST in your association.

Please give me specific name and contact information for the CCCDA and please include some photos with credits for our files for future use in articles and on the web. We will then add the Coyote Canyon horses to our Conservation Priority list and the CCCDA to our EST Affiliate Member listings, which will also be reflected our our website.

I would add congratulations, however, we both know it is not a blessing to have a breed on an endangered list. It is an upward battle to save those breeds and strains and we wish you every success in the stewardship of the Coyote Canyon horses. Let me know if I can answer any further questions for you.

Best regards,

Victoria Tollman, Executive Director
Equus Survival Trust
www.Equus-Survival-Trust.org

--- On **Thu, 11/3/11, CCCDA <*CCCDA@znet.com*>** wrote:

From: CCCDA <CCCDA@znet.com>
Subject: Coyote Canyon Wild Horses, four stallions left in the world
To: EquusSurvivalTrust@yahoo.com
Date: Thursday, November 3, 2011, 8:33 PM
Dear Board Members,
Would it be possible to list the Coyote Canyon wild horses as an "extinct in the wild Herd" on your webpage? Our project is to repatriate this herd to its native range. The history is as follows written by Deb Hurley (The attached information may be useful to you and applicable to other herds.)
"In 2003, a small herd of 29 wild horses of were driven by helicopter into the So. Ca. Anza Borrego Desert state Park Horse Camp. The Park claimed emergency removal

because horses were starving, yet photo evidence showed otherwise. Among the few people alerted to this round up were Kathleen Hayden and her husband Robert. The fat slick pregnant mares were taken from their warm So. Ca, home to a Sanctuary in South Dakota during a minus zero storm, None of the unborn foals survived the travel. The stallions were taken to a holding facility in Utah when, just in time to prevent their castration, Ca. Senator Bill Morrow interceded. Subsequently BLM acknowledged jurisdiction over the herd and offered local members of Backcountry horsemen a pilot partnership to repatriate the herd.

Unbeknownst to most Californians the final rounding up of the last Spanish Colonial wild horse herd represented a cultural evolution predating 1774. They were ousted from the very mountains and canyons they ranged for more than 220 years. These were the very last of Southern California 's Colonial Spanish wild horses sequestered in the Beauty Mt region of San Diego and Riverside Counties . Accounts of the herd history can be found in the 1850 Garra Revolt and raid at Warner Springs when Warner's livestock were taken into Coyote Canyon by Native Americans. Subsequent documentation of the Herd's continuity until their removal in 2003 is found in various historic accounts. None the less, State Parks denied their legal status, and hide their cultural evolution from Spanish Occupation, Native American Ranching, and pioneering history.

The Coyote Canyon herd area was designated in perpetuity under the 1971 Wild horse and Burro Act. IN 1993, the BLM land, including the herd area, was transferred to State Parks, when BLM illegally subrogated their duty to maintain the herd . Based on draught conditions and subjective observations by Bighorn sheep experts, Ca. State Parks determined that the habitat was unsuitable for the horses which had survived and thrived there for hundreds of years. All based on a assertion by parks that the horses were a non native exotic species to be eradicated from park lands. The required public involvement process was completely circumvented.

The only Four stallions remaining from the Coyote Canyon Heritage Herd are living near Warner Springs at the Hayden's who formed the non profit 501 C3 Coyote Canyon Caballos d Anza Inc (CCCDA). The goal and purpose of this organization is to repatriate, restore and maintain this herd to the BLM Beauty Mt region. This coincides with the goal and purpose to restore and maintain California 's first legislated Riding and Hiking Trail between San Diego and Riverside counties where the public can experience their living history.

In 2008 the Haydens discovered another wild horse herd in Utah , descended directly from Spanish Colonial horses on Southern California Ranchos, rustled and raided by the infamous Pegleg Smith and Chief Welkara. Utah has managed this herd to preserve its unique Colonial Spanish characteristics, and agreed foundation mares from this Sulphur Springs Herd would be a critical addition to the future of the Coyote Canyon horses. In March of 2009 thirteen lovely mares were delivered to CCCDA Board Member, and professional wild horse photographer, Kay Levie. After the birth of 10 foals she is affectionately referred to as Wild Horse Nanny.

This tiny herd is extinct in the wild, pending BLM's performance of partnership offer of restoration to their native ranges. BLM sent samples of the four Coyote Canyon Stallions to the wild horse genetic expert Dr. Cothran. He states that the heterozygosity value of 0.2 is well below the level set as the critical level for concern. The level of observed heterozygosity is consistent with isolation and or inbreeding.This information is

consistant with the 220 years of isolation of the Coyote Canyon herd, and their status as an critically endangerd special status species, EXTINCT IN THE WILD. The process can be expedited if San Diego and Riverside County Supervisors would declare them a local Heritage Wildlife Horse Herd. As BLM stated in a previous management plan "The issue of a wild horse as an invasive species is moot since the 1971 WHBA gave wild free-roaming horses "special" status based on their heritage of assisting man settle the "west" It has been 9 yrs and still BLM and USFWS have yet to amend the South Coast Resource Management plan to comply with NEPA, FLPMA, National Historic Preservation Act, ESA distinct population of specials status species, and the wildlife public trust doctrine as mandated.

It is critical that the offspring learn wildlife survival from their mamas inherent to continuity of the herd, so time is critical to the success of this release as the Foundation mares are older.

The presence of our wild horses on our public lands is not only a resource worth protecting and preserving, it connects us what makes the West the West… ...I am reminded of the quote "beside every foot print of man's evolution is a hoofprint."

We are encouraging letters of support or email to Congressman Darrell Issa or to the San Diego County Supervisors. Our progress can be followed on Face book under Coyote Canyon Heritage Herd or email us. At CCCDA@znet.com.

Please let us know if we you can assist us, or if we can assist you.

Sincerely yours,

Kathleen Hayden

Greg Hill gchill@blm.gov
RMP Lead
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
(760) 833-7140

Re: Draft *South Coast Resource Management Plan* (*RMP*) Revision and Draft prior to ROD comments due Dec 21,2011

Dear Greg,

The primary focus and purpose of the foregoing chronology and comments are for amending the Southcoast RMP, as required by law, to ensure the repatriation of the Coyote Canyon free roaming Heritage Wild Horse herd to its historic and cultural migratory ranges in this region. Please incorporate the comments, questions, and statements of Dr. TF King and Russ Kaldenberg as a portion of this document.

The Environmental Impact Statement/Environmental Impact Report (EIS/EIR) documents neglect to assess the direct, indirect, and cumulative effects to the physical, biological, socioeconomic environment, visual resources, cultural resources, recreation, wildlife, and environmental justice from the failure to address the Coyote Canyon Wild Horse Herd

Chronology

June 5, 1975 The Proposed Development and Management Plan for Applications for BLM Lands to be Added to Anza-Borrego Desert State Park, was filed.

This plan identified many wildlife and plant species. Excerpt " The most notable species of wildlife is the Big Horn sheep herd located near the San Diego County border. There is a wild horse herd in part of the acquisition proposal. Some semi-wild range cattle also have been observed." (Note) the wild horse herd is also referenced under the sections: Recreation facilities; Management; Resources Uses and Human Interest Values.

The occupied Coyote Canyon herd area (contained within application for land transfer) was a Congressional designated Herd Area, a habitat which was critical to this herd's continuity as a distinct population segment of wild horses. The herd area was a vested covenant which included a bundle of rights that passed with the BLM land transfer. BLM was required to identify those valid existing rights to be retained and, as the State of California does not have legal jurisdiction to manage or capture WH&Bs, that responsibility did not transfer to them.

Furthermore BLM's fiduciary duty mandate was to ensure a current and continuing inventory 43 CFR 4700.0-5 (d) To date BLM has refused my FOIA request to provide the inventory documents of this Heritage Herd as a special status species of wild free-roaming horses. BLM was required to manage them on their migratory ranges and had no jurisdiction to remove non excess horses. This was inherently a cumulative evolving process that could require habitat improvement and adjustments to ensure the herd's future. To facilitate the mandates, the process could require RMP amendments .

By 1985, the California Desert Conservation Area Plan amendment #18, was approved to reduce the wild horse population to zero for the Coyote Canyon HMA as prescribed in the Santa Rose Habitat Management Plan for the protection of bighorn sheep. This was done despite 16 USC 1332 c which defines range as the amount of land necessary to sustain an existing herd or herds of wild free roaming horses and burros, which does not exceed their known territorial limits and which is devoted principally to their welfare.

The 1985 plan amendment extinguished management provisions for our Coyote Canyon Heritage Herd despite the National Historic Preservation Act which states "The Congress finds and declares that the spirit and direction of the Nation are founded upon and reflected in its historic heritage; the historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people; the preservation of this irreplaceable heritage is in the public interest.

In 1993, 18 years after the 1975 Applications for BLM Lands to be Added to Anza-Borrego Desert State Park, BLM land (comprising the Coyote Canyon Herd Area) was transferred to Anza-Borrego Desert State Park as planned. Still, by 1995, the Park's Coyote Canyon Public Use Plan noted that the "25-40 wild horses in upper Coyote Canyon ...are protected by the federal Wild Horse and Burro Protection Act, thereby limiting our management activities."

1994 (from webpage) " The BLM South Coast Resource Management Plan was completed in 1994. Since that time there have been many changes in the region. Cities and counties in the region have adopted several multiple species habitat conservation plans (HCPs). The BLM, through agreements with local and State governments, and the US Fish and Wildlife Service, cooperates in the planning, creation, and management of these HCPs. The Inland Empire region includes public lands on Beauty Mountain in northeastern San Diego County."

Henri Bisson signed the 1994 RMP, as stated, to Provide protection and enhancement for biological values, to Provide for effective management and *protection of cultural* and paleontological sites and values, to Identify, maintain, and enhance recreational opportunities, responsive to local needs and public visitation to the area. The RMP neglected to indentify the same Heritage Horse Herd that Parks claimed were still hampering their management plans.

The Decision Record for the Northern and Eastern Colorado Desert and the Northern and Eastern Mojave Desert Coordinated Management Plans was signed in December 2002. These plans included public, local and state agencies, in which the plan addressed a multitude of resource management issues including wild horses and burros. The major emphasis was for the recovery of the threatened and endangered desert tortoise and other federal listed plant and animal species. Again, by premeditated oversight, the historic cultural populations of wild horse and burro HERDS were being extinguished and managed for extinction.

It is important to inject here that in May 2003 BLM acknowledged that wild equids had special species status . The agency commented in the Nevada Test and Training Range Resource Management Plan and Final EIS "The issue of a wild horse as an invasive species is moot since the 1971 WHBA gave wild free-roaming horses "special" status based on their heritage of assisting man settle the "west"….

In spite of this acknowledgement and the promotion of Henri Bisson to Washington DC the Coyote Canyon Horses were overlooked as a distinct unique species that were culturally historic to Coyote Canyon region's landscape. The oversight neglected to consider the

continuing/accumulating RMP impacts of removing 220 years of evolutionary history from the concerned public and stakeholders.

In the spring of 2003 State Parks illegally removed the herd and shipped the fat slick pregnant mares to a Sanctuary in South Dakota. None of the foals survived.

Immediately the agencies who acted in concert, were advised by California State Senator Bill Morrow on behalf of constituents, that the Coyote Canyon Wild Horses must be returned and restored. Tom Pogacnik, newly appointed Ca. wild horse and burro manager, proposed a pilot partnership program to restore the herd with our non- profit organization. He proposed the replacement/supplement of foundation mares, subsequently assisted by Utah BLM Wild Horse Manager, Gus Warr.

However, as I write these comments this November 2011, BLM has neglected to amend the RMPs to repatriate this "extinct in the wild" resource and honor the partnership commitment.

New evidence, written and oral has come to light since 2003 that would have impacted prior RMPs. Evidence that the original herd area was grossly under- inventoried necessitated a RMP amendment to include their expansive migratory ranges in the region.

The accumulative results of each politically motivated and technically flawed management plan changed several HMAs in the California Desert District. BLM emphasized that where these animals were to be managed, a herd management area plan would be developed which would include input from the public, local and state agencies. The coordinated management plans demonstrated a publication for input and partnerships with public/local/and state agencies. However with all the changes brought about to the California Desert District HMAs, by the 1994 California Desert Protection Act, and the two coordinated management plans, all the herd area management plans (HMAPS) were outdated and no revised HMAPS were written. Four months after the Desert Coordinated Management Plans was signed(December 2002) on March 2003 the Coyote Canyon Horses were confiscated from their home ranges by State Parks in total disregard of federal mandates.
The Southcoast RMP and EIS is well over 600 pages and I find no reference to restoration of the Coyote Canyon Heritage Herd, and no documentation of the voluminous errors, deficiencies and new evidence submitted since 2003.

The only acceptable remedy is Herd restoration.
Consider the Sage Grouse decision (http://www.eenews.net/assets/2011/09/30/document_gw_01.pdf from pages 18-37) as it pertains to basis for RMP amendments, accumlative effects, and special status species to be managed as a candidate for ESA listing. The decision apparently is based on conserving species before they need the ESA: see http://www.fws.gov/endangered/news/bulletin-summer2009/conserving-species-before-esa.html

NEPA and NHPA Sec 106 Review
(http://www.archaeologychannel.org/content/video/vidnews_nov10_700kW.html)
Under the Council on Environmental Quality's NEPA regulations, categorical exclusions must allow for "extraordinary circumstances" in which NEPA analyses ARE necessary to deal with an action's real-world impacts. The agency, having made a "catex" overlooked the need to allow for such circumstances. "Extraordinary circumstances" DO exist including non compliance of Section 106 of the National Historic Preservation Act. Based on prior EA's, BLM did not comply with Section 106 of the National Historic Preservation Act in eliminating the Coyote Canyon Wild horse herd. The EA documents allege:

1. that surveys were conducted to identify archaeological sites to be avoided in conducting the proposed actions,
2. and assertions that Indian tribes were consulted were actions consistent with BLM's nationwide programmatic agreement implementing Section 106,
3. and State Office's protocol agreement with the California State Historic Preservation Officer (SHPO).

However, the National Historic Preservation Act is not solely concerned with archaeological sites and places of value to Indian tribes the full spectrum of historic properties must be considered.
In this case, members of the public who value the historical and cultural character of the Coyote Canyon herd and herd area, assert that this distinct population of special status wild horses contributed to that character, and that removing them diminished that quality. This is precisely the kind of historic value the National Historic Preservation Act was designed to protect.

The question that would have to be addressed for purposes of Section 106 review would be whether the historic cultural migratory ranges of the Coyote Canyon herd are eligible for the National Register of Historic Places, in whole or in part, for their association with patterns of history to which this herd contributed. If the area or areas are eligible, and the herd contributed to their significance, then restoration would constitute an effect that must be further considered under Section 106 and its implementing regulations (36 CFR 800).

Nothing in the Southcoast EA indicates that BLM has given any consideration whatever to the possible historical and cultural significance of the herd and its historic and cultural migratory ranges on the public domain. This is a serious flaw in BLM's analysis of environmental impacts, both under Section 106 and under the National Environmental Policy Act (NEPA).

In reaching a management decision, however, BLM cannot ignore the negative impacts on historic properties, and to judge from the EA, BLM has not yet considered such impacts on an occupied Coyote Canyon wild horse area as a cultural landscape (or landscapes) to which the free-ranging wild horses contribute. This deficiency should be corrected, and impacts on the historic qualities of the area fully considered in accordance with the Section 106 regulations and BLM's programmatic agreement.... before the current Southcoast RMP can be approved.

Restated: The only acceptable remedy is Herd restoration via a Southcoast RMP amendment. Prior RMPs failed to mediate and rectify the accumulative deficiencies/effects that resulting in removal of the Coyote Canyon Heritage Herd. This herd meets the criteria defining a local distinct population segment of a cultural special status wildlife species. The herd represents the evolution of first Spanish Occupation, Native Ranching, and Western settlement; a span of 220 years. The RMP must provide ACECs as critical habitat to comply with NEPA, FLPMA, ESA, NHPA SEC 106.

The current definition of ACECs (Aug 2011 BLM Southcoast management Plan and EIS) define areas of Critical Environmental Concern) were authorized in Section 202 C3 of FLPMA, P.L. 94-579.
ACECs are areas where special management attention is needed to protect, and to prevent irreparable damage to important historic, cultural and scenic values; fish; or wildlife resources or other natural systems or processes.etc An area meets the relevance criterion if it contains one or more of the following....significant historic, cultural or scenic value....fish and wildlife resource including but not limited to habitat for endangered, sensitive or threatened species, or habitat essential for maintaining species diversity...etc

As stated in Mountain States v. Hodel "In structure and purpose, the Wild Free-Roaming Horses and Burros Act is nothing more than a land-use regulation enacted by Congress to ensure the survival of a particular species of wildlife. Wild horses and burros are no less "wild" animals than are the grizzly bears that roam our national parks and forests. Neither the States nor the Federal Government has title to these creatures until they are reduced to possession by skillful capture. However Utah's BLM's Wild Horse and Burro manager states "Foals, pregnant mares and older horses are easily hurt when pursued, so please allow them to live a free and unharassed life.
The herd is now extinct in the wild. Only 4 stallions remain in captivity. By Comparison there were 27 condors left in captivity when they went extinct.
Dr.Cothran examined the samples of the Coyote Canyon stallions sent to him by BLM. He states "Variation is extremely low including observed heterozygosity which is independent of sample size. I have seen lower but the value of 0.2 is well below the level set as the critical level for concern.

Re inventory of a herd area is taken from the lead direction provided in 2004 Resource Management Plan for the Nevada Wild Horse Range (NWHR) as follows.

The original acreage was dedicated by a cooperative agreement between the BLM State Director and the Commander of Nellis as the nations "first" wild horse range in 1962 with acreage revision done in 1965 - 6 years before the passage of the Act establishing a herd area of about 400,000 acres. After the passage of the Act, the NWHR was absorbed into the general Wild Horse & Burro Program and all cooperative agreements were dissolved in about 1972 and then re-established through new agreements. And so, Bureau of Land Management controlled the NWHR for the next 35 years. In their 2004 Resource Management Plan, the BLM suddenly stated that the original Herd Area was never properly identified for the NWHR at the passage of the Act and, that, 30 years later, they were attempting to remedy this error. After an interpretation of data that had everyone involved in the Range Management Plan up in arms, BLM determined it needed to expand the NWHR acreage to 1.3 million acres based on this new assessment (this is three times the size of the original Range and twice as much as what the National Program Office statistics cited)

One of BLMs leading arguments for this massive increase in acreage was, just because WH&Bs had not been documented in the areas did not mean that they weren't there when the Act was passed. This assertion was approved despite a Protest filed by the Nevada Department of Wildlife and 33 years after the passage of PL 92-195, BLM finally identified the original HA acreage and legally established 1.3 million acres of wild horse range; a more accurate assessment of the true territory of the WH&B populations in 1971. Although, the BLM has not always accurately recorded the size of Herd Areas as required, there is ample legal precedence established that it is "never too late" for them to remedy previous errors. The argument already used and approved is that, if BLM failed to properly identify the HA at the passage of the Act and with evidence in hand to show Wild Horses did occupy the area, then by law, BLM would have to "revisit" their Herd Area designation.

Based on the preceding information the Southcoast Resource Management plan must provide for the restoration and maintenance of the Coyote Canyon wild horse herd.

Respectfully submitted,
Kathleen Hayden
Coyote Canyon Caballos d'Anza

POB 236 Santa Ysabel Ca. 92070

BLM_CA_Palm_Springs_South_Coast_RMP

From: D'Angeles, Camelen
Sent: Wednesday, December 07, 2011 12:31 PM
To: velvetjaykay@yahoo.com
Cc: Kalish, John R; Foote, James R; Hill, Gregory C; Martinez, Cheryl L
Subject: RE: palmsprings feedback // upcoming land use drafts

Thank you for contacting the BLM to express your views. Your email will be forwarded to the appropriate staff and included in the BLM's records regarding this issue.

Cam D'Angeles
Management Assistant
Palm Springs / South Coast Field Office

-----Original Message-----
From: velvetjaykay@yahoo.com [mailto:velvetjaykay@yahoo.com]
Sent: Wednesday, December 07, 2011 12:12 PM
To: Cotterell, Gary L; D'Angeles, Camelen; mwest@ca.blm.gov
Subject: palmsprings feedback // upcoming land use drafts

name = Rebecca Florio
organization =
email = velvetjaykay@yahoo.com
subject = upcoming land use drafts
FeedbackType = Comment
request_comment = I am all in favor of protecting our natural resources. We have beautiful land and I feel it is important to preserve it for future generations. However, I also feel that as a resource, some of it can also be used-arefully-now.
I adopted a wild mustang, and have had him for about 10 years now. He is one of the best horses I have ever owned. I ride dressage on him and also do endurance and trail riding. It is a wonderful experience riding on trails through BLM lands.
The two of us are also volunteer patrol members in National, State, and Regional parks in our area.
I would like to conserve as much land as possible, but would please ask you to ensure right-of-ways and access to existing trails.
Dr. Rebecca Florio, DVM
username123 =
sentinal = Sentinal
page_referred_from = http://www.blm.gov/ca/st/en/fo/palmsprings.html
fo = 12
Submit = Send Request

BLM_CA_Palm_Springs_South_Coast_RMP

From: Doug & Kitty Kaul <oldchickenranch@gmail.com>
Sent: Wednesday, December 07, 2011 2:08 PM
To: Hill, Gregory C
Subject: Re: Shooting on Marron Valley Road

Follow Up Flag: Follow up
Flag Status: Completed

THANKS GREG, I DID LEAVE A MESSAGE FOR JOHN BUT GOT NO CALL BACK. YOUR INFORMATION DOES HELP AND IN THIS CASE I DID CALL THE SHERIFF AS THE SHOOTER WAS LESS THAN 20 FEET OF THE COUNTY ROAD SHOOTING HIGH POWERED HUNTING RIFLE.. MY PROBLEM THOUGH IS THE INCREASED SHOOTING THAT IS CONSIDERED LEGAL BUT HAS TURNED A ONCE QUIET NEIGHBORHOOD INTO A VERY NOISY ONE (ESPECIALLY ON HOLIDAYS AND WEEKENDS) AND A VERY TRASHY AREA WITH LEFT OVER DEBRIS. THIS COULD BE PREVENTED BY MAKING THE AREA CLOSE TO HOMES (YOUR NEIGHBORS) INTO A TEMPORARY (HOPEFULLY PERMANENT) "NO SHOOTING AREA"? THERE WOULD STILL BE PLENTY OF AREA TO SHOOT THAT WOULDN'T BE A NUISANCE OR HAZARD TO THE PEOPLE LIVING THERE. I WOULD ALSO LIKE TO HAVE CHICKEN RANCH GATE REMOVED FROM YOUR WEB SIT AS AN ACCESS POINT? I DON'T KNOW IF ANY OR ALL OF THIS COULD BE DONE BUT I SURE WOULD APPRECIATE BLM'S THOUGHTS ON THIS. THANK YOU, DOUG KAUL

On Wed, Dec 7, 2011 at 10:50 AM, Hill, Gregory C <gchill@blm.gov> wrote:

Dear Doug,

I received your voice message about the shooting problems around your home. I also sent the message to our Field Manager, John Kalish, and our Chief Ranger, Kevin Maclean.

My suggestion for the present is to determine the distance of the shooters from your home and from Marron Valley Road. I believe there is a county ordinance restricting discharge of firearms within a certain distance of property and roads. You might need to find out the distance requirement, but then it would be an issue for the County Sheriff. If the shooting is occurring beyond the distance in the county ordinance, and is on public land and there is still a safety hazard to your property, you can discuss this with our Field Manager as an emergency issue.

For the long term, BLM can place restrictions on target shooting on public lands, though the Resource Management Plan (RMP) that we are revising is generally not the document we use for that specific action. After we finalize the RMP, we will be preparing the next level of plans to implement the RMP, such as ACEC management plans. Under our preferred alternative, your area would be in the proposed Otay/Kuchamaa ACEC, and we would prepare a specific management plan for the ACEC that would address issues such as target shooting, campfire restrictions, recreation developments and uses, etc.

I’m not sure this helps, but please feel free to give us a call if the problem persists.

Greg Hill

Acting CDD Wilderness/NLCS Coordinator

Palm Springs-South Coast Field Office

1201 Bird Center Drive

Palm Springs, CA 92262

(760) 833-7140

BLM_CA_Palm_Springs_South_Coast_RMP

From: Elin Pierce <elpier@roadrunner.com>
Sent: Thursday, December 08, 2011 12:33 PM
To: Hill, Gregory C
Subject: South Coast Draft Resource Management Plan and EIS

November 3, 2011

South Coast RMP
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
<Greg_Hill@blm.gov>

RE: South Coast Draft Resource Management Plan and Environmental Impact Statement

To the BLM:

I appreciate the opportunity to comment on the revised South Coast RMP. As a Southern California resident who values our natural resources, I wish to support Alternative B, the Conservation Alternative. Alternative B provides ample public access and continued consumptive uses while doing the best job of protecting our stressed biological systems. For example, compared to the Preferred Alternative, the Conservation Alternative reduces motorized access and gives more land the protection of designation as Areas of Critical Environmental Concern. It also better supports our very important multiple species plans, specifically the San Diego MSCP and Riverside MSHCP, which themselves balance environmental, public access, and economic goals.

However, there are significant shortcomings that cut across all the alternatives – including Alternative B. These should be addressed in the final RMP:

- Fuel treatments, such as clearing and prescribed burning, have serious adverse biological consequences, such as conversion to weedy, flammable species. Treatments should occur only where effective – in strategic locations at the urban-wildland interface to create access points and fuel breaks for firefighting activities – and only *as needed*. A non-scientific, predetermined acreage target should be eliminated.
- Lands that are part of the Riverside MSHCP and San Diego MSCP should be protected as Areas of Critical Environmental Concern, as this is most consistent with plan management guidance and species conservation goals.
- Due to habitat fragmentation, right of ways for renewable energy projects should be sited outside of Areas of Critical Environmental Concern.

Thank you for your agency's progress to date on this plan, and thank you for considering my views.

Sincerely.

Elin Pierce, Ph.D.
Wildlife Biologist

BLM_CA_Palm_Springs_South_Coast_RMP

From: Eric Bruins <eric.bruins@mrca.ca.gov>
Sent: Friday, December 09, 2011 12:21 PM
To: Hill, Gregory C
Subject: RE: Resource Management Plan review period
Attachments: Item 9c map.pdf; 12-5-11 Item 9(c) Comment Letter.pdf

Hello Greg,

Please find our comments attached. Let me know if you have any questions.

Thanks,
-Eric

Eric Bruins
Mountains Recreation and Conservation Authority
5810 Ramirez Canyon Road, Malibu, CA 90265
310-589-3230 ext. 125 eric.bruins@mrca.ca.gov

From: Hill, Gregory C [mailto:gchill@blm.gov]
Sent: Wednesday, October 19, 2011 8:49 AM
To: Eric Bruins
Subject: RE: Resource Management Plan review period

Hello Eric,
The Draft South Coast Resource Management Plan was released on Sept. 23 with a 90 day public review/comment period, which ends on Dec. 21, 2011.

Thanks for your review of the document. We look forward to your comments.

Greg Hill
Acting CDD Wilderness/NLCS Coordinator
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
(760) 833-7140

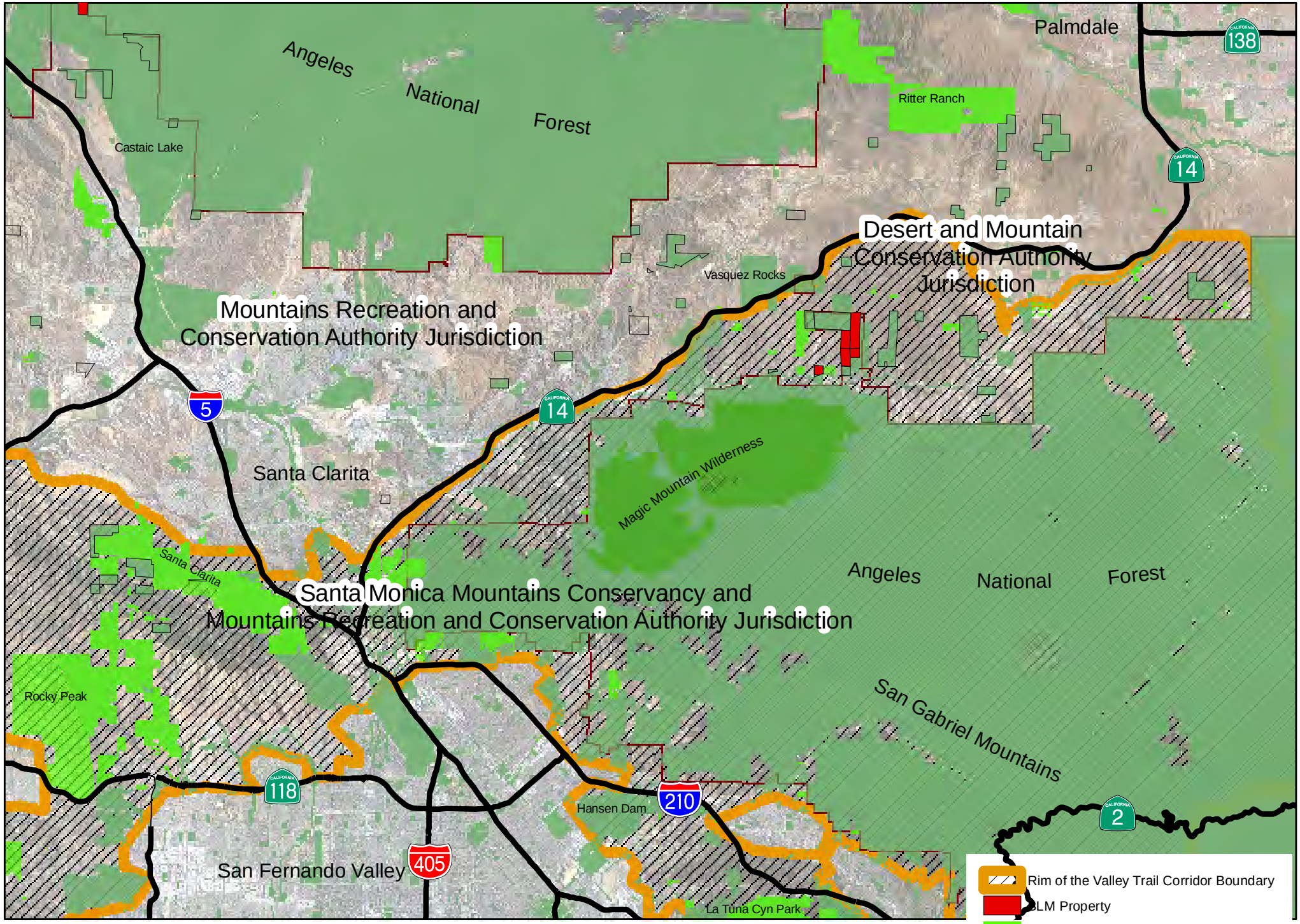
From: Eric Bruins [mailto:eric.bruins@mrca.ca.gov]
Sent: Tuesday, October 18, 2011 5:38 PM
To: Hill, Gregory C
Subject: Resource Management Plan review period

Mr. Hill,

When does the 90-day review period for the South Coast Resource Management Plan and EIS end?

Thank you,
-Eric

Eric Bruins
Mountains Recreation and Conservation Authority
5810 Ramirez Canyon Road, Malibu, CA 90265
310-589-3230 ext. 125 eric.bruins@mrca.ca.gov



Agenda Item 9(c)
SMMC
12/5/11

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Santa Monica Mountains Conservancy www.smmc.ca.gov
Mountains Recreation and Conservation Authority www.mrca.ca.gov
Desert and Mountain Conservation Authority www.dmca.ca.gov

SANTA MONICA MOUNTAINS CONSERVANCY
RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207
WWW.SMMC.CA.GOV

December 5, 2011

Mr. Greg Hill, RMP Team Lead
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, California 92262

Draft South Coast Resource Management Plan and Environmental Impact Statement

Dear Mr. Hill:

The Santa Monica Mountains Conservancy (Conservancy) is the State agency responsible for open space planning in the Rim of the Valley Corridor, which includes portions of the South Coast Resource Management Plan (RMP) area in Los Angeles County. The Conservancy supports the general thrust of the RMP update and looks forward to working with BLM to implement coordinated conservation efforts. The comments below relate to specific proposed activities within the Conservancy's jurisdiction.

The Conservancy strongly supports the RMP's proposed designation of Upper Santa Clara River BLM lands as an Area of Critical Environmental Concern (ACEC). These lands are included in the Angeles Linkage Conceptual Area Protection Plan (CAPP), a multi-jurisdictional conservation planning effort in the upper Santa Clara River watershed. The BLM currently owns 1,620 acres within the Angeles Linkage, forming a critical spine of protected land for ongoing conservation activity. The proposed ACEC designation will further these efforts by ensuring that BLM management is consistent with shared resource conservation objectives. Consistent with this designation, the RMP would enhance protection for visual resources in Soledad Canyon and withdraw these lands from surface entry mining.

The Conservancy further supports the RMP's general policies that protect riparian areas and oak woodland from disturbance. These habitats are increasingly rare in Southern California and contribute a disproportionate benefit to the region's biodiversity. The Conservancy encourages greater protection of coastal sage scrub habitat as well in the RMP. The RMP's proposed wildland fire management activities that respect ecological sensitivities are an improvement over current practices.

The Conservancy supports retention of BLM lands within regional habitat conservation plan areas and encourages collaborative management with local and State agencies. The Conservancy hopes that BLM will continue to be an active partner in the Angeles Linkage CAPP and leverage federal resources to advance regional conservation objectives, including acquisition of new lands. Lands within the CAPP and Santa Clara River watershed as a whole should only be disposed of through Protective Disposal to an appropriate local or State land management agency.

While BLM lands are mostly marked for retention under the draft RMP, the Conservancy urges that any lands the BLM intends to dispose of in the Santa Clara River watershed and the Conservancy Zone be first offered to conservation entities. The Conservancy requests that BLM recognize its statutory first right of refusal for all public land to be disposed of within the Conservancy's jurisdiction (California Public Resources Code §32646). This includes isolated parcels that BLM may find uneconomic to manage as federal land. The Conservancy's joint powers partners, the Mountains Recreation and Conservation Authority (MRCA) and Desert and Mountain Conservation Authority (DMCA), successfully manage such remote or discontiguous properties as part of a regional conservation strategy. The Conservancy, MRCA, and DMCA are willing to enter into any federal land disposal process that results in the permanent protection of open space in their respective jurisdictions (see attached map). The Conservancy and MRCA have particular interest in the BLM properties adjacent to the Santa Clarita Woodlands.

Lastly, as a minor point of correction, the BLM parcels noted on page 3-19 east of Interstate 5 are not located within the Santa Monica Mountains.

Thank you for the opportunity to review the draft RMP. If you have any questions, please contact Paul Edelman of our staff at (310) 589-3200, ext. 128.

Sincerely,

ANTONIO GONZALEZ
Chairperson

BLM_CA_Palm_Springs_South_Coast_RMP

From: artlark17@aol.com
Sent: Friday, December 09, 2011 1:10 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP; evans@friendsoftheriver.org
Subject: Protection of the Santa Margarita River

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov

Dear Mr. Kalish:

This letter is in support of protecting the Santa Margarita River as a Wild and Scenic River and an invaluable environmental resource.

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the Bureau of Land Management (BLM) to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final Resource Management Plan (RMP). The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge the BLM to adopt Alternative B (the conservation alternative which proposes protection of 67,506 acres of Critical Environmental Concern (ACEC), including an expanded 4,474 acre Santa Margarita River Ecological Reserve, in the South Coast RMP. This alternative emphasizes the protection and conservation of natural resources, including wildlife and habitat. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Thank you for your time and consideration of this most important issue.

Sincerely,
Laurenn Barker
P. O. Box 1913
Fallbrook, CA 92088

BLM_CA_Palm_Springs_South_Coast_RMP

From: Jim Foran <foran@alum.mit.edu>
Sent: Monday, December 12, 2011 7:17 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Cc: info@calwild.org
Subject: Santa Margarita River

Dear Mr. Kalish:

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Thank you.

Sincerely,

Jim Foran,

403 Camille Circle #12,

San Jose, California 95134

BLM_CA_Palm_Springs_South_Coast_RMP

From: Kyri Freeman <kyrifreeman@yahoo.com>
Sent: Monday, December 12, 2011 7:57 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: South Coast RMP

Dear Mr. Kalish:

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Thank you.

Sincerely,
Kyri Freeman
Barstow, CA

BLM_CA_Palm_Springs_South_Coast_RMP

From: Susan Heller <hellersd@yahoo.com>
Sent: Monday, December 12, 2011 8:04 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Santa Margarita River

Please recommended Wild & Scenic River protection for the Santa Margarita River as part of the agency's South Coast Resource Management Plan (RMP). This lovely, wild area should be protected for present and future generations - it is a unique feature of southern California, and offers unparalleled recreation opportunities for coastal residents and/or visitors alike.

Thank you, Susan Heller 1567 La Casita Drive, San Diego, CA 92078

BLM_CA_Palm_Springs_South_Coast_RMP

From: Crosland, Richard (NIH/NINDS) [E] <CroslanR@ninds.nih.gov>
Sent: Monday, December 12, 2011 8:22 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: South Coast Resource Management Plan (RMP). & Santa Margarita River

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov<mailto:capsscrmp@blm.gov>
Dear Mr. Kalish:
Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).
I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.
I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.
Please notify me when the BLM completes a final South Coast RMP for public review.
Thank you.

Richard Crosland, Ph.D.
8342 Rocky Springs Road
Frederick, MD 21702
301-694-7084
crosland@nih.gov<mailto:crosland@nih.gov>

BLM_CA_Palm_Springs_South_Coast_RMP

From: Julie. Scurfield <juliescurfield@sbcglobal.net>
Sent: Monday, December 12, 2011 8:47 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Santa margarita river in Riverside

Please protect this beautiful and free flowing river so that it's natural beauty will be there for generations to come! We need more nature in our lives not more cement!

Sent from my iPad

BLM_CA_Palm_Springs_South_Coast_RMP

From: Kathy Hanson <kayakinkathy@yahoo.com>
Sent: Monday, December 12, 2011 9:10 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: South Coast RMP Comments

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).
I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.
I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.
Please notify me when the BLM completes a final South Coast RMP for public review.
Thank you.

- Kathy Hanson

BLM_CA_Palm_Springs_South_Coast_RMP

From: Terry Welsh <terrymwelsh@hotmail.com>
Sent: Monday, December 12, 2011 9:15 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Snata Margarita River

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov
Dear Mr. Kalish:
Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).
I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.
I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.
Please notify me when the BLM completes a final South Coast RMP for public review.
Thank you.
Sincerely,

Terry Welsh
Costa Mesa California
714-719-2148

BLM_CA_Palm_Springs_South_Coast_RMP

From: Zuliebear@aol.com
Sent: Monday, December 12, 2011 9:21 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Santa Margarita River

Dear Mr. Kalish:

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Thank you.

Sincerely,
Dianne Erskine-Hellrigel

24820 Fourl Road

Nehall, CA 91321

BLM_CA_Palm_Springs_South_Coast_RMP

From: Robert J. Rosenberg <bob.rosenberg@lifesettlementfinancial.com>
Sent: Monday, December 12, 2011 9:21 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Protect the Santa Margarita River

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov

Dear Mr. Kalish:

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Thank you.

Sincerely,

Robert J Rosenberg

BLM_CA_Palm_Springs_South_Coast_RMP

From: Robert Siebert <eesolar@sbcglobal.net>
Sent: Monday, December 12, 2011 9:30 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Santa Margarita River

Hello Mr. Kalish:

I am in agreement with the positions of the California Wilderness Coalition and am forwarding a brief version of their comments.

Sincerely,

Robert Siebert

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

BLM_CA_Palm_Springs_South_Coast_RMP

From: Philsimtpr@aol.com
Sent: Monday, December 12, 2011 11:05 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: I SUPPORT WID AND SCENIC STATUS FOR THE SANTA MARGARITA RIVER

Dear Mr. Kalish:

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Thank you.

Sincerely,
Philip Simon

BLM_CA_Palm_Springs_South_Coast_RMP

From: tripper <tripper@ebold.com>
Sent: Monday, December 12, 2011 11:12 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Santa Margarita River

The Santa Margarita River should get wild and scenic designation. Look at the rivers that have been awarded this, and see how the drainage system is healthy and that the rivers attract visitors.
Meade Fischer
Watsonville, CA

--
"I have felt the Earth breathing, and I've heard it sing to me, and I know that it has the soul of an artist." from /Shattering the Crystal Face of God /www.baymoon.com/~eclecticpress

BLM_CA_Palm_Springs_South_Coast_RMP

From: Jack Tasoff <jtasoff@cox.net>
Sent: Monday, December 12, 2011 11:16 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: South Coast Resource Management Plan (RMP)

Dear Mr. Kalish:

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Jack Tasoff

San Pedro, California

jtasoff@cox.net

The trouble with the world is that the stupid are cocksure and the intelligent are full of doubt.

-Bertrand Russell

BLM_CA_Palm_Springs_South_Coast_RMP

From: Lois Tow <loistow@ix.netcom.com>
Sent: Monday, December 12, 2011 11:27 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: South Coast Resource Management Plan (RMP)

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov

Dear Mr. Kalish:

I am writing to comment on the revised South Coast Resource Management Plan (RMP).

I urge that the Santa Margarita River be recommended for protection as a Wild & Scenic River in the final RMP. As one of the last free flowing rivers in southern California, the Santa Margarita River is a treasure requiring protection. It has fantastic and irreplaceable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values.

About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge you to adopt Alternative B, because it emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Thank you.

Sincerely,
Lois M. Tow
455 Hazelwood Ave.
San Francisco, CA 94127-2129
loistow@ix.netcom.com

BLM_CA_Palm_Springs_South_Coast_RMP

From: George Alderson <george7096@verizon.net>
Sent: Monday, December 12, 2011 1:04 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Comments re South Coast RMP

John Kalish, Field Manager
BLM South Coast Field Office
Palm Springs, CA 92262

Dear Mr. Kalish:

Please consider this message as our comment on the draft South Coast RMP. Although we live far from your area, we have visited the South Coast, and we have a lifelong friend who is from San Diego.

We heartily support Wild & Scenic River status for the Santa Margarita River in the final plan. One of the last undammed rivers in California, the Santa Margarita meets the Wild & Scenic Rivers Act criteria for outstandingly remarkable natural and historical values. We would like to see BLM recommend Wild & Scenic status for the entire 10 miles between I-15 and the eastern boundary of Camp Pendleton. It should be managed jointly by the agencies that have jurisdiction.

We ask BLM to adopt Alternative B because it gives a high priority to protection and conservation of wildlife habitat and other natural values, and it establishes "areas of critical environmental concern" for special management attention, including an expansion of the Santa Margarita River Ecological Reserve ACEC and a new Upper Santa Clara River ACEC.

We also favor Alternative B for its protection of all lands that have wilderness characteristics and its limitation on livestock grazing and offroad vehicles.

Please keep us informed of further action on this planning project. Thank you for considering our views.

Sincerely,
George & Frances Alderson
112 Hilton Avenue
Catonsville, MD 21228
E-mail: george7096@verizon.net
Tel: 410-788-7096

BLM_CA_Palm_Springs_South_Coast_RMP

From: page allen <pageallen92@gmail.com>
Sent: Monday, December 12, 2011 1:15 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Santa Margarita River

Dear Mr. Kalish:

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Thank you.

Sincerely,
Elizabeth Allen

Claremont, California

BLM_CA_Palm_Springs_South_Coast_RMP

From: terence omalley <omalley_terence@yahoo.com>
Sent: Monday, December 12, 2011 1:35 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Cc: Terence OMalley
Subject: santa margarita river

i urge blm to recommend santa margarita river as a wild and senic river

BLM_CA_Palm_Springs_South_Coast_RMP

From: Lou Anna Denison <LAnnD4animals@charter.net>
Sent: Monday, December 12, 2011 1:43 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Rrevised South Coast Resource Management Plan (RMP).

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov

Dear Mr. Kalish:

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

We urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

We urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify us when the BLM completes a final South Coast RMP for public review.

Thank you.

Sincerely,

Mr and Mrs James Denison

6931 E 11 Th St

Long Beach, CA 90815

BLM_CA_Palm_Springs_South_Coast_RMP

From: Helge Zieler <helgezieler@yahoo.com>
Sent: Monday, December 12, 2011 3:34 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Protection for the Santa Margarita River

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov

Dear Mr. Kalish:

I am writing to you as a voice in favor of protecting the Santa Margarita River as a Wild & Scenic River.

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. I have hiked along this river many times, and also driven along it in the sections that are accessible by road, and always admired its beauty and uniqueness. Let us protect this river for the sake of all future generations that they may enjoy the same wild scenery that I feel so lucky to have practically in my back yard.

About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

With many thanks for your consideration.

Sincerely yours

Helge Zieler
158 Beechtree Drive
Encinitas, CA 92024

BLM_CA_Palm_Springs_South_Coast_RMP

From: Joel Masser <joelmasser@hotmail.com>
Sent: Monday, December 12, 2011 4:13 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: South Coast Resource Management Plan

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish:

Firstly, I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

Secondly, I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Thank you.

Sincerely,
Joel Masser
5327 Romford Drive
San Jose, CA 95124

BLM_CA_Palm_Springs_South_Coast_RMP

From: spotts@infowest.com
Sent: Monday, December 12, 2011 4:56 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: My comments on revised South Coast RMP

Importance: High

December 12, 2011

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov

Dear Mr. Kalish::

Please accept this E-mail letter with my comments on the revised South Coast Resource Management Plan (RMP).

I grew up in southern California in the 1950s and 1960s, and I'm familiar with some of the areas covered by this revised RMP, including the Santa Margarita River. I believe that strong conservation measures are necessary to ensuire the continued ecological health and biological diversity of these areas. I've witnessed decades of poor land use planning that allowed excessive sprawl and habitat fragmentation, and the associated loss of land health and wildlife habitats. It is important to learn from this history so that it is not repeated.

As such, I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

Overall, I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands. It is especially important to remove livestock grazing from sensitive riiparian habitats..

BLM Director Abbey says that he wants BLM to become the "premier" land management agency. Adopting a strong final RMP to ensure effective conservation would be a positive and tangible step in that direction.

Thank you very much for considering my comments.

Sincerely,

Richard Spotts

1125 W. Emerald Drive

Saint George Utah 84770-6026

spotts@infowest.com

BLM_CA_Palm_Springs_South_Coast_RMP

From: Allan Chen <feldspar@well.com>
Sent: Monday, December 12, 2011 9:20 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Santa Margarita River

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov

Dear Mr. Kalish:

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Thank you.

Sincerely,

Allan Chen
111 Shepardson Lane
Alameda CA 94502

BLM_CA_Palm_Springs_South_Coast_RMP

From: Lisa Schneider <honeybear3371@adelphia.net>
Sent: Monday, December 12, 2011 10:42 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Comments on South Coast RMP Revision

RMP Team Lead December 12, 2011
BLM Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
www.blm.gov/ca/palmsprings

COMMENTS RE: Draft RMP/EIS

- The preferred alternative should be Alternative A, no action.
- Alternatives B, C & D do not adequately protect access roads and existing trails (even though Alternative C is the "public Use" alternative, provisions are made to ensure ***"resource protection is not compromised."*** Yet, no provisions are made to ***guarantee*** access to existing roads and trails).
- Alternatives B, C & D may impose more restrictions.
- Alternatives B & D restrict fire suppression & equipment in Special Management Areas (SMAs).

Regulate and maintain what is already in BLM's Planning Area.
BLM manages 300,000+ acres in the coastal region of the five Southern California counties and has acquired many more private property parcels since 2009 (nearly 2100 acres in Chihuahua Valley alone) that are not shown in the Draft Plan. There are roads and trails on BLM land that are not currently maintained; roads and trails for public use that are impassable from downed trees, heavily rutted or washed out trail, and overgrown brush. Additionally, sensitive areas within public lands are sometimes restricted to legitimate, lawful, minimal impact users only to be unchecked for unlawful activity (encampments, marijuana groves, etc…). If BLM cannot now maintain existing roads and trails and regulate it's thousands of acres of Special Management Areas, how can it manage additional land? The easy solution for BLM will be to close existing trails and roads and further restrict SMAs. Public use will suffer.

- BLM must have a specific plan to work with local public use groups (equestrian, hunting, birding, hiking, biking etc…) to ***ensure*** that these roads and trails remain open.
- If BLM has resources to "ensure" environmental and cultural values, it must have a balanced approach and provide resources for maintenance and public use.
- BLM's support of equestrian, hiking, biking group activities and events motivates cooperation and involvement in trail maintenance.
- The BLM needs to work with local residents near SMAs (and all public lands) to patrol these areas and report illegal activity (similar to a neighborhood watch).
- If another alternative is considered, the Draft RMP should make provisions to allow equestrian and other minimal impact activities in ACECs, Wilderness Designations, and WSAs.

Please clarify the following items:

1. Please define a Major Surface Disturbance Activity.
2. What activities are prohibited in an Avoidance Area?
3. Please define "recreation opportunities" that complement conservation of biodiversity.

4. What studies have been done to demonstrate that equestrian activities *adversely* impact public lands?

As users of public land near Chihuahua Valley, we have serious concerns about expanding ACEC, Wilderness Designations, and WSAs in this area. Alternatives B, C, and D will impose more restrictions in this area, affecting our quality of life. Further, Alternatives B & D would restrict fire suppression equipment & technique in SMAs which could have catastrophic consequences for residents and all recreational users.

Sincerely,
Lisa & Shel Schneider
Honeybear3371@adelphia.net

BLM_CA_Palm_Springs_South_Coast_RMP

From: Alan Carlton <carltonal@yahoo.com>
Sent: Tuesday, December 13, 2011 7:18 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov
Dear Mr. Kalish:
Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).
I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.
I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.
Please notify me when the BLM completes a final South Coast RMP for public review.
Thank you.
Sincerely,
Alan Carlton

Alan Carlton
2208 Pacific Ave.
Alameda CA 94501
(510) 769-3403

BLM_CA_Palm_Springs_South_Coast_RMP

From: Michael Alda (Long Beach) <MAlda@sarecycling.com>
Sent: Tuesday, December 13, 2011 9:45 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: SANTA MARGARITA RIVER

Please recommend Wild and Scenic protection for the Santa Margarita River as part of your South Coast Resource Management Plan. Please protect the Santa Margarita River for present and future generations. Thank you.

MICHAEL ALDA
SA RECYCLING
482 PIER T AVE.
LONG BEACH, CA.90813
562 628 8163

This transmission may contain information that is privileged, confidential, proprietary, and exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or use of the information contained herein (including any reliance thereon) is STRICTLY PROHIBITED. If you received this transmission in error, please contact the sender and delete the material from any computer immediately. Thank you.

BLM_CA_Palm_Springs_South_Coast_RMP

From: Janet Wa <janetwa@hotmail.com>
Sent: Thursday, December 15, 2011 10:05 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: RE: RMP Comments

Dear Mr. Hill,
Thank you for your prompt response.

I am aware that expansion of designated wilderness and WSA's takes an act of Congress. And, as the 112th Congress considers designating new wilderness (including expanding the Beauty Mountain Wilderness Area-Rep. Issa), it was my understanding that revisions to the RMP affects current and *future* designations. Is that a correct assessment? If it is, public land in my area could be affected by revisions described in Chapter 3, Affected Environment, and in Appendix F. ***"Wilderness designations can be considered the most restrictive of the federal land management designations."*** As a resident near, and potentially adjacent, to Special Management Areas, I have particular interest in any revisions that are being considered.

As mentioned in my comments, fire protection is my primary concern! And, if either alternatives B or D(BLM's preferred) are implemented then the management actions for suppression would be restricted, *"All suppression equipment and techniques would be allowed,* ***except in Special Management Areas (Wilderness, WSA's, ACEC's, etc.)****, based on values to be protected."* Who will make that decision? And, will it be in the best interest me, my family, and our neighbors??

Secondly, public use activities, specifically horseback and hiking, are extremely important to me and most residents in the area. We are requesting clarification on the following items:

- Please Define a Major Surface Disturbance Activity.

- What activities are prohibited in an Avoidance Area?
- Please define "recreation opportunities" that compliment conservation of biodiversity.
- What studies have been done to demonstrate that equestrian activities *adversely* impact public lands?

If possible, I prefer clarification in writing to affectively communicate with others of like concerns. I understand that the holidays are upon us and appreciate the time you take to communicate with me.

Regarding trail grant and maintenance, I would be happy to come to the field office (in January?) and discuss AERC's trail grant program and talk about priorities BLM has for trail maintenance.

Kind regards,
Janet Worts

From: BLM_CA_Palm_Springs_South_Coast_RMP@blm.gov
To: janetwa@hotmail.com

Date: Wed, 14 Dec 2011 17:01:18 -0700
Subject: RE: RMP Comments

Dear Ms. Worts,

We have received your comments on the Draft South Coast Resource Management Plan Revision. If you have further comments about the plan and alternatives not expressed in your letter, please submit them in writing before the end of the 90 day comment period on December 21. If you have questions regarding clarification of any of the alternatives or organization of the plan, please give me (or Holly Roberts) a call at 760 833-7100. As one point of clarification, expansion of designated wilderness and wilderness study areas (WSA) are not proposed by BLM or included in any alternatives. Wilderness designation occurs through legislation passed by Congress and not through the BLM land use planning process. Existing wilderness areas and WSAs are discussed in the plan as part of Chapter 3, Affected Environment, and in Appendix F. ACECs and lands with wilderness characteristics can be established in land use plans, and vary between the four alternatives in the Draft South Coast Resource Management Plan.

We would be happy to discuss maintenance of trails at your convenience, though much of our staff will be on holiday vacations through the rest of the month. We have active partnerships with the Backcountry Horsemen and other volunteer trails groups and look forward to developing new partnerships.

Thank you for your interest in the public lands of the South Coast Planning Area.

Greg Hill

Palm Springs-South Coast Field Office

1201 Bird Center Drive

Palm Springs, CA 92262

(760) 833-7140

From: Janet Wa [mailto:janetwa@hotmail.com]
Sent: Tuesday, December 13, 2011 5:09 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: RMP Comments

Dear Mr. Gregory Hill,
Please see attached document for comments regarding the Draft RMP/EIS.

If it is possible, I would like to come to the BLM Field Office and discuss concerns we and our neighbors have about the

possible expansion of ACEC's, WSA's, Wilderness Designations, and land with Wilderness Characteristics. I would only need about thirty minutes of your time. Also, I would like to briefly discuss the possibility of partnering with BLM in maintaining trail systems and building new trail. I am a ride manager with American Endurance Ride Conference and have trail grant money available to use for trail projects. I want to work with BLM in keeping our trails open and safe.

I look forward to your reply.

Kind regards,
Janet Worts

RMP Team Lead
BLM Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
www.blm.gov/ca/palmsprings

December 9, 2011

COMMENTS RE: Draft RMP/EIS

- The preferred alternative should be Alternative A, no action.
- Alternatives B, C & D do not adequately protect access roads and existing trails (even though Alternative C is the "public use" alternative, provisions are made to ensure ***"resource protection is not compromised."*** Yet, no provisions are made to ***guarantee*** access to existing roads and trails).
- Alternatives B, C & D may impose more restrictions.
- Alternatives B & D restrict fire suppression in Special Management Areas (SMA's).

Regulate and maintain what is already in BLM's Planning Area.

BLM manages 300,000+ acres in the coastal region of the five SoCal counties and has acquired many more private property parcels since 2009 (nearly 2100 acres in Chihuahua Valley alone) that are not shown in the Draft Plan. There are roads and trails on BLM land that are not currently maintained; roads and trails for public use that are impassable from downed trees, heavily rutted or washed out trail, and overgrown brush. Additionally, sensitive areas within public lands are sometimes restricted to legitimate, lawful, minimal impact users only to be unchecked for unlawful activity (encampments, marijuana groves, etc…). If BLM cannot now maintain existing roads and trails and regulate it's thousands of acres of Special Management Areas, how can it manage additional land? The easy solution for BLM will be to close existing trails and roads and further restrict SMA's. Public use will suffer.

- BLM must have a specific plan in working with local public use groups (equestrian, hunting, birding, hiking, biking etc…) to ***ensure*** that these roads & trails remain open.
- If BLM has resources to "ensure" environmental and cultural values, it must have a balanced approach and provide resources for maintenance and public use.
- BLM's support of equestrian, hiking, biking group activities & events motivates cooperation and involvement in trail maintenance.
- Work with local residents near SMA's (and all public lands) to patrol these areas and report illegal activity (similar to a neighborhood watch).
- If another alternative is considered, the Draft RMP should make provisions to allow equestrian and other minimal impact activities in ACEC's, Wilderness Designations, and WSA's.

Please clarify the following items:

Please define a Major Surface Disturbance Activity.
What activities are prohibited in an Avoidance Area?
Please define "recreation opportunities" that compliment conservation of biodiversity.
What studies have been done to demonstrate that equestrian activities *adversely* impact public lands?

As residents of Chihuahua Valley we have grave concern about expanding ACEC, Wilderness Designations, and WSA's in our area. Alternatives B, C, & D will impose more restrictions in our area, affecting our quality of life. Further, Alternatives B & D would restrict fire suppression equipment & technique in SMA's which could have catastrophic consequences for us and our neighbors.

Sincerely,
Phil & Janet Worts
janetwa@hotmail.com

BLM_CA_Palm_Springs_South_Coast_RMP

From: Packard, Christine <cpackard@SyntheticGenomics.com>
Sent: Wednesday, December 14, 2011 8:51 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Santa Margarita River

To Whom It May Concern:

Please, I urge you to work to do everything in your power to protect this beautiful area.

Thank you kindly,
Christine Packard

Christine Packard
Synthetic Genomics, Inc.
Senior Research Associate
11149 North Torrey Pines Road
La Jolla, California 92037
Phone: 858.754.2900
Fax: 858.754.2988
CPackard@SyntheticGenomics.com
www.SyntheticGenomics.com

BLM_CA_Palm_Springs_South_Coast_RMP

From: bobmclaughlin <bobmclaughlin@myway.com>
Sent: Wednesday, December 14, 2011 12:23 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Protection for Santa Margarita River

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov

Dear Mr. Kalish:

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Thank you.

Sincerely,

Robert McLaughlin
980 Peralta Ave
Albany, CA 94706
BobMcLaughlin@myway.com

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of Collin Summers <crazykidcollin@yahoo.com>
Sent: Wednesday, December 14, 2011 10:13 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 15, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Mr. Collin Summers
PO Box 2782
San Bernardino, CA 92406-2782
(490) 280-2742

BLM_CA_Palm_Springs_South_Coast_RMP

From: lczefa@gmail.com on behalf of Daniel Yee <danielyee79@gmail.com>
Sent: Thursday, December 15, 2011 10:46 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: South Coast Resource Management Plan Revision 2011

I am AGAINST the closure of all this public land. Better management with different types of gates, rails and signs are far better for public use then closing it down. It is a shame that it is felt that closure is the only option, especially in San Diego Dulzura area. This is the only open land left for some sports to be done in and you will close it for what?

Do not close this land and deprive the PUBLIC of its use.

Regards,
Daniel Yee

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of John Kolarik <hobeko@juno.com>
Sent: Thursday, December 15, 2011 12:46 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 15, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Mr. John Kolarik
151 Bergwall Way
Vallejo, CA 94591-6705
(707) 644-3705

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of John Haddock <haddockj@gmail.com>
Sent: Thursday, December 15, 2011 1:16 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 15, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

As a once-Southern CA whitewater kayaker, I have personally been immersed in the inspiring beauty of Temecula Gorge. This was a sanctuary of sort that my friends and I would retreat to whenever the winter rains passed through. My first time in the gorge, I remember thinking "Wow, I hope this place remains as it is and always has been. I feel like I'm in the true California, before man left his overwhelming footprint on a large percentage of the state." Please do not pass up this opportunity to protect such a valuable resource that, in this day in age, has become so hard to find, especially in Southern CA.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Mr. John Haddock
6201 Coldwater Ct
Raleigh, NC 27612-6502

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of Charles Hammerstad <chamerstad@aol.com>
Sent: Thursday, December 15, 2011 1:16 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 15, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

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I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Mr. Charles Hammerstad
780 Portswood Dr
San Jose, CA 95120-3334

BLM_CA_Palm_Springs_South_Coast_RMP

From: Benjamin Green <benjamingreen@suddenlink.net>
Sent: Thursday, December 15, 2011 1:20 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Santa Margarita River

It has come to my attention that the BLM is revising its South Coast Resource Management Plan. I would like to urge that the Santa Margarita River be protected as a Wild and Scenic River. As a kid, I used to fish this river with my grandfather. It was (and is) one of the few coastal streams in southern California to support trout. There were, and are, rumors of steelhead (confirmed to be true). This river is one of the last free flowing streams in the southern state. As such it offers outstanding scenic, recreational, wildlife (plants and animals), and historical/cultural values. These values need to be protected. Wild and Scenic designation is probably the best tool to protect these values. The draft management plan offers several alternatives. I believe Alternative B is preferable, especially because of the enlarged ACEC for the river.
Thank you for considering my comments.
Benjamin Green
3415 Patricks Point Dr #3
Trinidad, CA 95570

BLM_CA_Palm_Springs_South_Coast_RMP

From: Nick Rodin <nickrodin@gmail.com>
Sent: Thursday, December 15, 2011 1:34 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Santa Margarita River

Dear Mr. Kalish:

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Thank you.

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of Hons. Jim & Diana Prola <jimprola@yahoo.com>
Sent: Thursday, December 15, 2011 2:16 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 15, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

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Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Mr. Hons. Jim & Diana Prola
2234 Belvedere Ave
San Leandro, CA 94577-6554
(510) 483-0744

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of Larry Keller <larry.keller342@comcast.net>
Sent: Thursday, December 15, 2011 2:16 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 15, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

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I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
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Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Mr. Larry Keller
1330 Vine Hill Rd
Santa Cruz, CA 95065-9610

BLM_CA_Palm_Springs_South_Coast_RMP

From: Brandt Solovij <bso@qad.com>
Sent: Thursday, December 15, 2011 3:59 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: BLM Land Closures in SoCal

STOP CLOSING OUR LANDS!!!! YOU'RE TAKING THE STATE AWAY FROM THE CITIZENS!!!! As an active OHV enthusiast I whole heartedly am against the closure of the lands referenced in your Transportation Planning doc aviable on your website. STOP THE CLOSURES!!!!

--
Brandt Solovij
Web Marketing Specialist.
QAD, INC

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of Sandy Zelasko <slzphoto@sbcglobal.net>
Sent: Thursday, December 15, 2011 5:46 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 15, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

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I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Ms. Sandy Zelasko
15864 Severino Ln
Valley Center, CA 92082-7635

BLM_CA_Palm_Springs_South_Coast_RMP

From: Dave Voss <voss.david@att.net>
Sent: Thursday, December 15, 2011 7:31 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild and Scenic Protection for the Santa Margarita River

Dear John Kalish:

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I have hiked the trails and river bottom of the Santa Margarita too many times to count. I have led others to this area and they are amazed that this beautiful river is so close to civilization. This river is a unique treasure and we are very fortunate it has remain wild and untouched.

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Thanks,
David Voss
7743 Lucia Ct
Carlsbad, CA 92009
voss.david@att.net

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of Gene R. Trapp & Jo Ellen Ryan <grtrapp@comcast.net>
Sent: Thursday, December 15, 2011 10:17 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 16, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

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Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Dr. Gene R. Trapp & Jo Ellen Ryan
2313 Isle Royale Ln
Davis, CA 95616-6619

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of Deborah Filipelli, Ph. D. <dfilipelli@mcn.org>
Sent: Friday, December 16, 2011 9:49 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 16, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

The preservation and protection of wild places, specifically the Santa Margarita River ensures the diversity of flora and fauna and improves the quality of my life.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Ms. Deborah Filipelli, Ph. D.
PO Box 341
The Sea Ranch, CA 95497-0341

BLM_CA_Palm_Springs_South_Coast_RMP

From: Skyer, Melissa D <MSkyer@semprautilities.com>
Sent: Friday, December 16, 2011 11:18 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Cc: Houston, Don; Meyer, Justin J; Grady, Johnny; Tartaglia, Tony
Subject: Southern California Gas Company - Comments on the revised South Coast RMP/EIS
Attachments: SCRMP BLM_SoCalGas comments 12-16-11 final.pdf

Dear John Kalish,

Please find attached comments on the South Coast RMP/EIS provided by Southern California Gas Company (SoCalGas). The Natural Resources and Land Planning Department at SoCalGas appreciates your review and consideration of our comments on the revised RMP/EIS document. Should you have any questions please do not hesitate to call Don Houston at (213) 244-5412.

Sincerely,

Melissa Skyer
Environmental Specialist
Southern California Gas Company
555 West 5th Street, GT16G3
Los Angeles, CA 90013
Phone: (213)-785-3799
Email: MSkyer@semprautilities.com

Don Houston
Supervisor - Natural Res. & Land Planning
Environmental Services

555 W. Fifth St., GT16G3
Los Angeles, CA 90013
Tel: (213) 244-5412
dfhouston@semprautilities.com

Southern California Gas Company

A Sempra Energy utility℠

December 16, 2011

John Kalish
Field Manager
Palm Springs - South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262

RE: Southern California Gas Company Comments on the Palm Springs - South Coast Field Office Bureau of Land Management Draft Revised Resource Management Plan and Environmental Impact Statement

Dear Mr. Kalish,

Southern California Gas Company (SoCalGas) is the nation's largest natural gas utility serving 20 million customers across approximately 20,000 square miles in California. SoCalGas is a Sempra Energy utility regulated by the California Public Utilities Commission (CPUC). SoCalGas strives to provide safe and reliable natural gas service to its customers while protecting the unique natural resources of our geographic region in compliance with applicable state and federal regulations. Within the Palm Springs South Coast Bureau of Land Management (BLM) Resource Management Planning Area (SCRMP), SoCalGas infrastructure is limited to approximately 1,000 feet of natural gas pipeline in Los Angeles County (Figure 1).

The Environmental Services Department of SoCalGas currently functions to assure that company activities remain in compliance with all applicable state and federal environmental regulations (such as the Endangered Species Act, Clean Water Act and the California Environmental Quality Act). SoCalGas also utilizes internal Standard Operating Procedures (SOPs) and Best Management Practices (BMPs) to further protect sensitive resources and minimize environmental impacts such as erosion and sedimentation. SoCalGas believes that the combination of these measures serves to effectively protect natural resources on BLM managed public lands within the Palm Springs South Coast Field Office jurisdiction.

Although infrastructure in the SCRMP Planning Area is minimal, SoCalGas would benefit from being involved in discussions regarding access route alterations, limitations of activity in designated areas and land tenure adjustments in areas that contain existing roads and facilities. SoCalGas intends to continue pre-activity project notification to the BLM regardless of which RMP alternative is implemented.

In closing, SoCalGas supports a balanced approach to resource protection and multiple uses on public lands in California. SoCalGas requests the support of the South Coast BLM field office in allowing for continued access to existing infrastructure and the streamlining of resource management BMPs. Should you have any questions please do not hesitate to call me at (213) 244-5412.

Sincerely,

Don Houston
Supervisor – Natural Resources and Land Planning
Environmental Services
Southern California Gas Company

FIGURE 1 - Segments of SoCalGas Pipelines
Crossing BLM Parcels within the South Coast RMP
USGS Quad: Agua Dulce;
T4N/R12W;
Section 14;
APN: 3211-016-270
0 50 100 200
Feet
USGS Quad: Mint Canyon;
T4N/R15W;
Section 31;
APN: 2833-024-031
0 25 50 100
Feet
14
126
5
210
210
N
BLM
Property
SoCalGas
Pipelines
Highways,
Freeways,
& Interstates

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of Matt Stoecker <pvgriz@yahoo.com>
Sent: Friday, December 16, 2011 1:49 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 16, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

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I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Mr. Matt Stoecker
PO Box 2062
Santa Barbara, CA 93120-2062

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of Daniel Brower <pacuarecholo@yahoo.com>
Sent: Friday, December 16, 2011 3:50 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 16, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

Water is a scarce commodity in Southern California. Free flowing rivers with intact riparian habitat adjoining them is even more scarce.
I implore the BLM to set aside this stretch of the Santa Margarita River and afford full permanent protection so that future generations of Southern Californians can admire and enjoy the beauty of this river and its canyon. Thank you.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Mr. Daniel Brower
10449 Oak Valley Rd
Angels Camp, CA 95222-9735

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of Marilyn Randall <rvloverx2@juno.com>
Sent: Friday, December 16, 2011 8:20 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 16, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

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Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Ms. Marilyn Randall
4390 Lowell St
La Mesa, CA 91942-9111

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of Norma J F Harrison <normaha@pacbell.net>
Sent: Friday, December 16, 2011 8:50 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 16, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

.PLease please us.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Ms. Norma J F Harrison
1312 Cornell Ave
Berkeley, CA 94702-1010
(510) 526-3968

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of Denise Mason <denisemason55@yahoo.com>
Sent: Friday, December 16, 2011 11:21 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 17, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Ms. Denise Mason
8312 Northvale Way
Citrus Heights, CA 95610-0803
(916) 727-0299

BLM_CA_Palm_Springs_South_Coast_RMP

From: Bryant, James <JBRYANT@riversideca.gov>
Sent: Saturday, December 17, 2011 10:20 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Santa Margarita River

I understand that the BLM is soliciting comments in response to the revised South Coast Resource Management Plan (RMP), specifically with respect to the status of the Santa Margarita River. I would like to encourage the BLM to include a recommendation of Wild & Scenic River protection for the Santa Margarita as a part of the final RMP. The Santa Margarita River is a very rare feature in southern California – a generally free-flowing stream surrounded by natural landscape - and thus has enormous ecological, scientific, and historical/cultural significance for the region. In particular, the BLM should consider Wild & Scenic protection for a 10-mile segment between Interstate 15 and the eastern boundary of Camp Pendleton, as this could then be jointly managed by the federal, state, and local agencies with jurisdiction in that area. Such an approach appears to be part of Alternative B within the present draft of the RMP, along with a number of other beneficial natural resources protections.

Thank you for your consideration.

James M. Bryant

Curator of Natural History

Museum Department, City of Riverside

3580 Mission Inn Avenue

Riverside, CA 92501

(951) 826-5273

(951) 369-4970 FAX

jbryant@riversideca.gov

BLM_CA_Palm_Springs_South_Coast_RMP

From: Don Morrill <donaldrmorrill@gmail.com>
Sent: Saturday, December 17, 2011 1:48 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: South Coast Resouce Management Plan

I enthusiastically encourage the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. This stream is one of the last free flowing rivers in Southern California, and deserves the highest level of protection of its ecological, wildlife, historic, and cultural attributes.

I support the adoption by BLM of Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Thank you.

Sincerely,

Don Morrill

BLM_CA_Palm_Springs_South_Coast_RMP

From: Michael Dasargo <dasargo@msn.com>
Sent: Saturday, December 17, 2011 11:01 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: BLM Recreational Shooting

To Whom it May Concern,

I understand that there is an effort to close various BLM lands to the public. Please leave these areas open and/or provide designated BLM areas that will remain available for recreational shooting.

Thanks in Advance,
Michael Dasargo

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of Joanne Crandall-Bear <jcrandallbear@gmail.com>
Sent: Sunday, December 18, 2011 12:37 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 18, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Ms. Joanne Crandall-Bear
414 T St
Sacramento, CA 95811-6914

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of Donna Carr, M.D. <donnacarrmd@aol.com>
Sent: Sunday, December 18, 2011 1:08 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 18, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Dr. Donna Carr, M.D.
1201 Sidonia St
Encinitas, CA 92024-2240
(760) 436-7836

BLM_CA_Palm_Springs_South_Coast_RMP

From: G. Johnson <surfonit@yahoo.com>
Sent: Sunday, December 18, 2011 6:35 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild and Scenic River Status for Santa Margarita River

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov

Dear Mr. Kalish:

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Thank you,

George Johnson
729 Olive
Carpinteria, CA 93013
surfonit@yahoo.com

BLM_CA_Palm_Springs_South_Coast_RMP

From: Denyse Beaudet <denysebeaudet@gmail.com>
Sent: Monday, December 19, 2011 8:22 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic River Protection for the Santa Margarita

Dear Mr. Kalish:

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Thank you.

Sincerely,

Denyse Beaudet
10555 Cam. Memosac
San Diego, CA 92131
Denyse Beaudet, Ph.D.
denysebeaudet@gmail.com

BLM_CA_Palm_Springs_South_Coast_RMP

From: Joseph Nunez <joefnunez@yahoo.com>
Sent: Monday, December 19, 2011 9:03 AM
To: Hill, Gregory C; Hill, Gregory C
Cc: Kenna, James G; Maciel, Martha L; Shellooe Jr, Richard D; Hunter, Charlotte A; capsscrump@blm.gov; John_Kalish@ca.blm.gov; Kalish, John R; david preddy; Michael.Harrison@mail.house.gov; art shurtleff; Hamilton McWhorter; ed.zieralski@uniontrib.com; Grant; caesdrmp@ca.blm.gov
Subject: Fw: response to BLM
Attachments: Joe's BLM letter (1).doc

Dear Mr. Hill, recently (29 Nov) BLM held a 'Public Workshops' here in San Diego at the Rancho Jamul Ecological Reserve. The Workshops were intended to allow the public a review of the 'Draft' Resource Management Plan (RMP) and a public solicitation of the RMP, providing a final date (21 Dec 2011) for submitting any comments. After your presentation an open forum was allowed for questions/comments. While you stationed yourself at a side table, I along with two other individuals offered questions. My question to you was directed to the locked 'PINK Gate' blocking Public access to Public Land designated as Sycamore Canyon, and asking you justification for this gate being locked. You responded with '...the area immediately beyond the gate was deemed an archaeological site...'. I want to direct your attention to a letter I provided the Bureau (29 Nov 2006) paragraph #5 disclaiming this site as a sensitive archaeological site. You claim the Bureau was provided evidence supporting your claim by an 'Indian Council' and to provide me with the council names so I may verify your claim. After more than five years I've yet to receive this promised information. You request public comment to the RMP allowing the Bureau time to reconsider decisions to the plan and yet by your own admission the Bureau has no intention of altering this plan. In other words what you're telling the public '... here's the plan like-it-or-not...'. How does this SCRMP comply with E.O. #13443 , and the U.S. Dept. of Interior's declaration, HR 3534, of allowing the public recreational access to public lands? Your stated intention is to publish public comments concerning the Bureau's RMP, I have serious doubts the Bureau will provide the public access to all comments.

Remember these are public lands, not the Bureau's and you and your cohorts continue to obfuscate the truth by using misleading, fabricated, unreliable statements in order to justify the thievery of our public lands. The public is justified with their growing suspicion concerning BLM's misuse of its authority over public lands. I as a taxpaying citizen request the names of the so-called 'Indian Council' and specific names of the council members deeming this site as sensitive. Explain to me how this SCRMP complies with E.O. #13443 and H.R. #3534. I've attached my Nov 2006 letter. I'm also asking for the removal of the 'PINK Gate'

and allow the public to deservedly lawfully recreate on designated public lands. Joe Nunez (619-222-2911).

Joseph Nunez
1989 Mendocino Blvd.
San Diego, CA 92107

November 29, 2006

Gail Acheson, Field Manager
United States Department of the Interior, Bureau of Land Management
P.O. Box 581260
690 W. Garnet Ave.
N. Palm Springs, CA 92258

Re: 8300 CA-660.69
Portion of Rancho Jamul known as Sycamore Canyon in the County of San Diego guarded by a locked Pink Gate.

Dear Gail Acheson,

Thank you for your letter, 16 Oct, concerning "Sycamore Canyon". Even though we've never discussed my concerns it is nice to be included in the mailing list. However, I did discuss my concerns regarding the future of this area with Joyce Schlachter and Janeye Byergo. My focus was not only to the "restricted motor vehicle access" you and your cohesive group continues alluding to. My focus also extends to the gate, the "Pink Gate", itself. The most often used entrance to the "Sycamore Canyon" area is blocked by a now Locked gate. A "Pink Gate" - someone painted the gate pink - it is commonly referred to as the "Pink Gate" or the "area behind the Pink Gate" - most frequenters to the area do not know this area as "Sycamore Canyon."

The cohesive group – Gail Acheson, Joyce Schlachter, and Janeye Byergo - I am addressing represent "BLM" and have presented various statements justifying the closure/locking of the "Pink Gate." I will address these assertions individually.

1) The land was acquired by "CDFG" and "BLM" as part of the core reserve of the San Diego Multiple Species Conservation Program. I have talked to "CDFG" personnel and all have indicated to me the "Pink Gate" should not be locked. Two of the individuals expressed to me the "Pink Gate" should not be there. I agree! There should be no gate at this entrance. This is a very dangerous location for any gate and someday someone will be seriously injured by a passing motorist. I conveyed this to Joyce and she replied "there is not enough financial support" to construct a better entrance. I then volunteered myself and friends to construct a safer entrance if "BLM" provided the material. Joyce declined. This is a grave situation warranting the bodily injury in order to obtain a positive result. "BLM" should strongly reconsider this issue.

2) This area is not for off road vehicular use – off roading has degraded the area. I have witnessed no public off roading myself, I'm certain it does occur. I suggest "BLM/CDFG" post a large sign to this effect. But keep in mind the major "off roaders" in this area are the U.S. Border Patrol. They are the culprits establishing the uphill roads used by the public "off roaders." The public "off roaders", in most part do not initiate a new road but will enjoy an unsigned

existing road already established and this is furnished for the most part by the U.S. Border Patrol.

3) Resources damaged due to fire and shooting related impacts. Reinstatement of the closure to motorized vehicles because of the most recent fire is a "Red Herring" - the cohesive group and those of interest know this. Motorized vehicles had nothing to do with the most recent fire. Illegal Aliens from Mexico caused this fire – this is the consensus as reported by the Forest Service fire fighters. Unless someone is on the site planting and watering, normal vehicular use will have no ill effect on the restoration. Cattle roamed freely in this area for more than forty years with no ill effect. I have no idea how "shooting related impacts" will have an adverse impact on "post-fire restoration activities." If shooting is a problem then erect a sign "if you shoot clean up after yourself." This last statement must have been an unconscious memory escape (lapse), someone made an incorrect insertion thinking (hoping) it would be overlooked (unnoticed). You can surely do better than this.

4) In a phone conversation, Joyce brought to my attention "dead animals" were encountered on the property. I asked her what kind of animals and if these encounters were documented, and could I see the documentation? She quickly told me she did not have nor could she provide me with this documentation because it was being combined with other evidence in a process to establish proper documentation. Animals die, it is a natural process. Predators eat prey, it is a natural occurrence. If these "dead animals" are an unnatural event – dieing in an unnatural or illegal manner – then law enforcement must be made aware of this.

5) "Especially significant were impacts to a major archaeological site." I talked to Joseph Linton – son of tribal head of the Santa Ysabel Indians, part of the Kumayaay Nation of Native Americans. Joseph's father and cousin are council members to locate and establish any Kumayaay sensitive archaeological sites. I asked specifically about this site on the property of Sycamore Canyon. They were unaware of any sensitive archaeological Kumayaay site in Sycamore Canyon, but were familiar with the area. They then asked me for some time in order to inquire about this site. Approximately two weeks later I was notified by Joseph telling me their investigation came up empty. He also stipulated "…a few pottery shards…" do not constitute an archaeological site. I then asked if this site possibly may have been overlooked by the council? He explained it may have been over looked but his father has been working on Kumayaay sites in San Diego County for more than forty years. If there is a major archaeological site in the county his father would surely be aware of it. Joseph then added his cousin, being much younger than the older Linton, was very aggressive at searching out these sites. I then asked Joseph if he was aware of anyone from his family or any council member being contacted by " BLM or CDFG" concerning this particular site. He replied in the negative concerning any notification. Joyce, in a telephone conversation with me, directed me to the site. I'm very familiar with the exact location of this site. The area described is often used by the Border Patrol as a holding area because of it's proximity to the entrance/exit - the "Pink Gate." I have seen mounds of rock,

cement, and concrete piled onto this so called "sensitive site" – to be used later to fill in washed out roads in the Sycamore Canyon area. Why would "BLM" and the Border Patrol plunder this site? Maybe we need to redefine "major", "sensitive", and "archaeological". According to the parties of concern it is "not" an archaeological site.

6) Concerning the Quino Checkerspot Butterfly. The future of this little butterfly remains very doubtful. I visited with Mike, a graduate student at San Diego State University. His graduate work consisted of all aspects of the Quino Checkerspot. He advised me according to his analysis the Quino Checkerspot will be extinct in his lifetime. This little butterfly ranges from near Jacumba westward to almost Alpine – East San Diego County. It is extremely sensitive to any habitat disturbance. The villainous culprit in the case of the Quino Checkerspot is development. Any form of modern development and related by products – freeways, noise related to building construction, shopping malls, etc. None of this occurs in the Sycamore Canyon. Remember Cattle freely roamed in Sycamore Canyon less than twenty years ago, with no ill affect to the Quino Checkerspot. The communities of Alpine, Pine Valley, Campo, et al, have dramatically increased in size recently. There are now two large casinos within the habitat of the Quino Checkerspot, and everything casinos bring with them. None of this exists in the Sycamore Canyon area

The important issues of your letter have now been covered. In retrospect, and being open minded, I'm not even slightly convinced the "Pink Gate" is in any way remotely responsible for any accusations resulting in the existence of the gate itself. The "Pink Gate" is not connected to non-existent archaeological sites, fires, mysterious dead animals, offroading by other than the Border patrol, etc. The cohesive group is making a futile attempt to convince those of interest the automobile was the cause for the demise of the dinosaurs. The cohesive group holds government positions, positions of trust and responsibility. Putting forth this kind of information, using this type of reasoning, will only result in the loss of your credibility. It is apparently obvious the cohesive group has no concern for facts..., or the truth. Remember the Sycamore Canyon is now public domain, to be used and enjoyed by the public. The cohesive group has taken this land away for some unknown reason. The reasons put forth are unreasonable and should never be mentioned again.

I beg and plead - please consider my request – remove the "Pink Gate."

Thanks for your timely attention to this very important matter.

Joe Nunez

Cc: (by email)
Rep. Duncan Hunter
Kathleen Clarke, BLM Director
Mike Pool, BLM - Calif. State Director
Steve Borchard, BLM - Calif. Desert Dist. Mgr.

BLM_CA_Palm_Springs_South_Coast_RMP

From: Janet Wa <janetwa@hotmail.com>
Sent: Monday, December 19, 2011 10:02 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Cc: Roberts, Holly L; Kalish, John R
Subject: RE: RMP Comments

Dear Mr Hill,
Thank you again for your prompt response.

Regarding fire suppression:
Thank you for directing me to the Management Actions Common to All Alternatives. I am familiar with BLM's goals and objectives and appreciate that human life, communities, property, etc... are BLM's highest priority. But, why the confusing statement: *All suppression equipment and technique would be allowed except in special management areas* ? Why the need for conditional/modified fire suppression strategies for SMA's when measures for fighting fire are already *based on values to be protected* ? BLM and CAL FIRE (and other agencies) already work together to preserve life and ensure resource protection.

Chihuahua Valley residents need to be assured that conservation, though important; will not take precedent over public safety. ALL techniques should be used to fight fire, including the use of mechanized equipment in a SMA. This valley has ONE way in and ONE way out. It is surrounded by a lot fuel that should be managed without restrictions imposed by the provisions of a Special Management Area so as to minimize loss of life and property. Environmental and cultural values are more likely to be preserved as a result.

We are opposed to expansions of Special Management Areas in Chihuahua Valley.

Regarding clarification on public use:
I too found references in the draft plan on Major Surface Disturbance Activity (MSDA). However, examples of a MSDA did not include horse back riding. Nor did it include horse back riding activities such as an endurance ride or a NATRC ride, or any other group equestrian activity. We urge BLM management to support equestrian activities and events. As you may know, I was recently denied access for an equestrian to existing trail and road on BLM's newly acquired land in Chihuahua Valley. The reason: "too much impact in the ACEC." The decision was puzzling since the proposed route was on existing roads and established trail.

It is a fact that a very small percentage of BLM's entire management area consists of SMA's. (And, thank you for including the percentage of Riparian Areas and Oak Woodlands. That figure may be slightly off, though, as it does not include recent acquisitions.) However, Chihuahua Valley is unique. BLM now owns/manages the majority of land in the entire valley, much of it now considered or proposed an SMA. Public lands in our community are disproportionate when compared to the total percentage of public lands to private lands in the SC region.

We purchased our property several years before the majority of land acquisitions with the intent of riding our horses in the open spaces, using existing roads and established trails and hosting equestrian events. We developed good relations with owners of the two largest ranches in the valley, the Rocking W & Sky Oaks. These owners supported and encouraged our equestrian activities. The Rocking W even hosted a sanctioned endurance ride in November.

When the owners of Sky Oaks and Rocking W sold the majority of their land to Conservancy (now managed by

BLM), we were assured by them that BLM would continue to support and encourage equestrian activities, as well as other public use activities. It is our desire and hope that BLM will indeed be supportive and reconsider access to existing roads and established trails in future activities and events. Events such as endurance and NATRC maximize public exposure to public lands with the least amount of impact. There is no data to support otherwise.

Thank you for your professional and patient responses.

I wish you and your staff and wonderful, restful holiday.
Warm regards,
Janet Worts

From: BLM_CA_Palm_Springs_South_Coast_RMP@blm.gov
To: janetwa@hotmail.com
CC: h1robert@blm.gov; jkalish@blm.gov
Date: Thu, 15 Dec 2011 17:50:20 -0700
Subject: RE: RMP Comments

Dear Ms. Worts,
Based on your questions, I think we can clarify the following:

As mentioned in my comments, fire protection is my primary concern! And, if either alternatives B or D(BLM's preferred) are implemented then the management actions for suppression would be restricted, *"All suppression equipment and techniques would be allowed,* ***except in Special Management Areas (Wilderness, WSA's, ACEC's, etc.)****, based on values to be protected."* Who will make that decision? And, will it be in the best interest me, my family, and our neighbors??

Answer: Please see Chapter 2, Section 2.3.8 Wildland Fire and Fuels. As noted under Goals and Objectives, protection of human life, communities, property, and public safety are the highest priority for the BLM. Also note Section 2.3.8.2 Management Actions Common to All Alternatives. This section specifies that all needed measures will be taken to suppress wildfires and reduce wildfire risk to communities. These goals also apply to the alternatives, including measures to operate in Special Management Areas.

Secondly, public use activities, specifically horseback and hiking, are extremely important to me and most residents in the area. We are requesting clarification on the following items:

- Please Define a Major Surface Disturbance Activity.

Answer: We found reference to "major surface disturbance activities" in the sections of the draft plan that pertain to vegetation management, in particular to riparian areas and oak woodlands. The following statements are from Chapter 2, Table 2-1, and apply to Alternatives B and D:
"Riparian areas would be exclusion areas for all major surface disturbance activities. Approximately 760 acres of riparian habitats occur on BLM lands within the planning area, which is less than 1% of the planning area."
"Oak woodlands would be avoidance areas for all major surface disturbance activities. Approximately 1,700 acres of oak woodlands occur on BLM lands within the planning area, which is less than 1% of the planning area."

In the context of vegetation management, major surface disturbance activities would be those BLM management actions or authorized uses that result in major clearance or disturbance of the soils and vegetation. Examples would include construction of roads, powerlines, communication sites, water tanks, parking lots, buildings, or other facilities. These types of actions usually occur through issuance of a right-of –way or other land use authorization. Riparian areas and oak woodlands are among the rarest and most fragile landscapes in the planning area and are also protected through a variety of local, county, and state land use regulations.

- What activities are prohibited in an Avoidance Area?

  Answer: Avoidance and exclusion areas are used in the context of issuing rights-of-way or other land use authorizations. Land use authorizations, including rights-of-way and avoidance and exclusion areas are defined and discussed in Chapter 2, Section 2.3.17.2 and Section 2.3.17.3. Land Use Authorizations by Alternative are shown in Table 2-23 on page 2-102.

- Please define "recreation opportunities" that compliment conservation of biodiversity.

  Answer: We could not find a reference in the document regarding recreation opportunities that complement conservation of biodiversity. However, recreation opportunities on BLM managed public lands are generally defined as the full range of recreation activities that can include, but are not limited to, camping, hiking, horseback riding, fishing, hunting, bicycle riding, passenger vehicle touring, off-highway vehicle driving, photography, etc. In the document we do use the term low-impact recreation, which is generally defined as non-motorized recreation, such as hiking, horseback riding, bicycle riding, photography, etc. Low impact recreation would also imply limited or no developed recreation facilities such as campgrounds, new roads, new buildings, or other large scale developments.

- What studies have been done to demonstrate that equestrian activities *adversely* impact public lands?

  Answer: We are not aware of any reference in the Draft Plan as to alternatives or proposed decisions specifically affecting equestrian activities that required studies on adverse impacts to public lands, nor are there any proposed decisions in the draft plan that would eliminate or restrict equestrian activities.

We hope this answers your questions and help clarify the alternatives in the Draft South Coast Resource Management Plan. If you have further questions please give me or Holly Roberts a call at 760 833-7100.

Greg Hill
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262

From: Janet Wa [mailto:janetwa@hotmail.com]
Sent: Thursday, December 15, 2011 10:05 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: RE: RMP Comments

Dear Mr. Hill,
Thank you for your prompt response.

I am aware that expansion of designated wilderness and WSA's takes an act of Congress. And, as the 112th Congress considers designating new wilderness (including expanding the Beauty Mountain Wilderness Area- Rep. Issa), it was my understanding that revisions to the RMP affects current and *future* designations. Is that a correct assessment? If it is, public land in my area could be affected by revisions described in Chapter 3, Affected Environment, and in Appendix F. ***"Wilderness designations can be considered the most restrictive of the federal land management designations."*** As a resident near, and potentially adjacent, to Special Management Areas, I have particular interest in any revisions that are being considered.

As mentioned in my comments, fire protection is my primary concern! And, if either alternatives B or D(BLM's preferred) are implemented then the management actions for suppression would be restricted, *"All suppression equipment and techniques would be allowed,* ***except in Special Management Areas (Wilderness, WSA's, ACEC's, etc.)****, based on values to be protected."* Who will make that decision? And, will it be in the best interest me, my family, and our neighbors??

Secondly, public use activities, specifically horseback and hiking, are extremely important to me and most residents in the area. We are requesting clarification on the following items:

- Please Define a Major Surface Disturbance Activity.

- What activities are prohibited in an Avoidance Area?
- Please define "recreation opportunities" that compliment conservation of biodiversity.
- What studies have been done to demonstrate that equestrian activities *adversely* impact public lands?

If possible, I prefer clarification in writing to affectively communicate with others of like concerns. I understand that the holidays are upon us and appreciate the time you take to communicate with me.

Regarding trail grant and maintenance, I would be happy to come to the field office (in January?) and discuss AERC's trail grant program and talk about priorities BLM has for trail maintenance.

Kind regards,
Janet Worts

From: BLM_CA_Palm_Springs_South_Coast_RMP@blm.gov
To: janetwa@hotmail.com
Date: Wed, 14 Dec 2011 17:01:18 -0700
Subject: RE: RMP Comments

Dear Ms. Worts,
We have received your comments on the Draft South Coast Resource Management Plan Revision. If you have further comments about the plan and alternatives not expressed in your letter, please submit them in writing before the end of the 90 day comment period on December 21. If you have questions regarding clarification of any of the alternatives or organization of the plan, please give me (or Holly Roberts) a call at 760 833-7100. As one point of clarification, expansion of designated wilderness and wilderness study areas (WSA) are not proposed by BLM or included in any alternatives. Wilderness designation occurs through legislation passed by Congress and not through the BLM land use planning process. Existing wilderness areas and WSAs are discussed in the plan as part of Chapter 3, Affected Environment, and in Appendix F. ACECs and lands with wilderness characteristics can be established in land use plans, and vary between the four alternatives in the Draft South Coast Resource Management Plan.

We would be happy to discuss maintenance of trails at your convenience, though much of our staff will be on holiday vacations through the rest of the month. We have active partnerships with the Backcountry Horsemen and other volunteer trails groups and look forward to developing new partnerships.

Thank you for your interest in the public lands of the South Coast Planning Area.

Greg Hill
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
(760) 833-7140

From: Janet Wa [mailto:janetwa@hotmail.com]
Sent: Tuesday, December 13, 2011 5:09 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: RMP Comments

Dear Mr. Gregory Hill,
Please see attached document for comments regarding the Draft RMP/EIS.

If it is possible, I would like to come to the BLM Field Office and discuss concerns we and our neighbors have about the possible expansion of ACEC's, WSA's, Wilderness Designations, and land with Wilderness Characteristics. I would only need about thirty minutes of your time. Also, I would like to briefly discuss the possibility of partnering with BLM in maintaining trail systems and building new trail. I am a ride manager with American Endurance Ride Conference and have trail grant money available to use for trail projects. I want to work with BLM in keeping our trails open and safe.

I look forward to your reply.

Kind regards,
Janet Worts

BLM_CA_Palm_Springs_South_Coast_RMP

From: trot338 <trot338@gmail.com>
Sent: Monday, December 19, 2011 3:36 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: RMP

I was born in this Southern part of the great state of California. I worked in the back country, I supported conservation and wildlife projects and volunteered on many of these projects for over forty years. I have also hunted, fished, hiked the back country for over fifty years.
What I have seen and experienced is not what natured had in mind.

The land has been used up locked up, for homes, play areas, etc...Because of what some groups suggest or propose and the consequences have been an altering of nature, governments especially, has caused nature to suffer . The more roads and reasonable access are locked up , the more invasive shrub growth and other out of control processes take hold, nature suffers.

I am not for an isolationist from nature , rather my comments are for adequate recreational access to public lands and waters and that if a closure is proposed, I am for proof positive evidence to that based on scientific concrete evidence for such closures....

Thank you, Joe Busalacchi

BLM_CA_Palm_Springs_South_Coast_RMP

From: Vicky Hoover <vicky.hoover@sierraclub.org>
Sent: Monday, December 19, 2011 8:50 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Comment on South Coast Resource Management Plan (RMP).

I am pleased to have the opportunity to offer comments on the BLM's draft RMP for the South Coast.

I am supporting Alternative B, and urge BLM to adopt this Alternative.

Reasons why I support Alternative B:
1.It provides for the best protection of natural resources, including wildlife and its habitat.
2. It calls for protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC.
3. Alternative B would give protection to lands with wilderness characteristics --which has become an extremely important mandate to include in planning and in all project level decisions, with recent direction from the Director, (07/26/2011 Instruction Memorandum No. 2011-154, and further, in policy instructions re "Considering Lands with Wilderness Characteristics", for example:
"An alternative that protects lands with wilderness characteristics must contain management actions to achieve protection.."
4.this alternative calls for some reasonable limits to grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands. I support such an important and useful management action.

In addition, I support a recommendation for the Santa Margarita River Wild & Scenic River protection. This highly deserving river that starts in Riverside County and continues in San Diego County is sometimes referred to as the last free flowing river in southern California. Please recommend this protection as part of your South Coast RMP.

The BLM earlier determined a short 1-plus mile segment of the Santa Margarita River that flows through BLM-managed lands to be eligible for Wild & Scenic protection in 1994. But the new South Coast RMP now gives an opportunity to propose protection for the entire 10-mile segment of the river between Interstate 15 and the eastern boundary of Camp Pendleton, to be jointly managed by the BLM and state and local agencies with jurisdiction over the remaining part of the 10-mile segment.

Federal plans to restore endangered steelhead trout to the Santa Margarita River make its protection exceedingly desirable.

Thank you for considering these comments.

Vicky
Vicky Hoover
735 Geary St., Apt 501
San Francisco, CA 94109
(415)977-5527

BLM_CA_Palm_Springs_South_Coast_RMP

From: Keli Balo <kbelizabeth@hotmail.com>
Sent: Tuesday, December 20, 2011 8:42 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP; Hill, Gregory C
Subject: Comments on the Draft South Coast Resource Management Plan (RMP) Revision
Attachments: keli blm letter.pdf

Subject: Comments on the Draft South Coast Resource Management Plan (RMP) Revision

Thank you for providing the ability for the public to comment on the Draft Resource Management Plan.

The preferred alternative D is overly restrictive for recreation and should be revised to reflect a balance between protection of sensitive natural resources and providing the public free use and enjoyment of their public lands. Your proposed alternative removes the public's ability to enjoy their public lands justified by the perceived need to protect sensitive natural resources. Public land closures and restrictions on use must be justified by documented need. Perceived conflict between recreation and wildlife is not a justified need to unnecessarily close off hundreds of acres of public land. The BLM is required to provide access to their lands for the public to enjoy. The current version of the South Coast Resource Management Plan endorsing alternative D unduly restricts access to BLM lands and must be revised to include more recreational opportunities and reduce the amount of closures and restrictions being placed on BLM lands.

The Draft Plan states numerous times that other agencies management policies will be used to guide management of BLM lands within this plan. BLM lands must be managed by the federal guidelines in place and not by other jurisdictions over restrictive management policies. MSCP management principals are guided by resource protection alone and are not appropriate for BLM lands.

There are policies outlined in this RMP that close public lands for the protection of common and non-sensitive wildlife species that need to be removed. Incorporating policies and management principles that exhaust limited resources (staff, money) to micromanage populations of common and stable wildlife species is a waste and takes precious resources away from sensitive species that are legally required to be managed for recovery.

Appendix E, Best Management Practices for Raptors needs to be removed in its entirety from this RMP. The industry definition of Best Management Practices is that of which you have defined in the glossary. Placing a raptor management plan in this section is misplaced and curiously hidden from the public in a section where it doesn't belong. Restrictions and public land closures included in the raptor BMP's are more restrictive than management practices outlined in Chapter 3and 4 for endangered species. It makes no sense. The Migratory Bird Treaty Act does not mandate the closure of public lands for buffer zones to protect birds from disturbance. This is a gross misinterpretation of the law and cannot be used to justify the closure of public lands for all raptor

species. Appendix E Section C is not in line with the BLM's mission or consistent with the RMP. Common raptor species DO NOT NEED closure buffers to protect them from disturbance. This appendix is misplaced, not based on scientific data or justified need, and is not in alignment with BLM management principals.

If raptor management is a priority for the BLM, then an appropriate NEPA process must be used to prepare a management plan that is consistent with federal regulations, justified by scientific data, is species specific and regionally appropriate for lands that must be managed for both public use and resource protection. Throwing BMP's for raptors into the appendix of a document as if they are a federal standard or as if they have already undergone a public review, circumvents the appropriate NEPA process and is a violation of federal policy. Remove Appendix E, Section C in its entirety from the South Coast RMP.

Sincerely,

Keli Balo

4878 Monroe Ave
San Diego, CA 92115

BLM_CA_Palm_Springs_South_Coast_RMP

From: beberjoso <beberjoso@mac.com>
Sent: Tuesday, December 20, 2011 10:35 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Santa Margarita River

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish:
Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).
I strongly urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.
I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.
Please notify me when the BLM completes a final South Coast RMP for public review.
Thank you.

Jonny Pray
44 Breeze
Venice, CA 90291

BLM_CA_Palm_Springs_South_Coast_RMP

From: michael.kaul@gmail.com on behalf of KM Kustom <kandmcustom@gmail.com>
Sent: Tuesday, December 20, 2011 11:17 AM
To: Hill, Gregory C
Subject: BLM Marron Valley rd comments

Gus and Angie Merziotis

1343 Marron Valley rd

Dulzura, CA 91917

Dear BLM,

We understand that, of course, public lands should be open and available to the public where warranted and manageable; we are convinced from personal experience living here for 30 years- that the Marron Valley "Chicken Ranch" gate should continue to REMAIN LOCKED.

There are already existing entrances that offer access to the public without encroaching on residences and already overcrowded two lane roads. There are four major entrances to this area I believe you have overlooked the importance of using one the other three. The three other include the Otay Lakes entrance, the "pink gate" entrance just east of the Border Patrol check point, and another behind the existing rod & gun club. These alternate entrances have the least impact on people that have homes nearby.

The idea of using the Chicken Ranch gate as a staging area to this area not only has a huge impact on the daily living of our entire community, it also has a severe and direct impact on people who are BLM neighbors. Of the four possible locations to this area, the "Chicken Ranch" gate has the highest population of houses and proximity to people. By keeping the Chicken Ranch gate closed and utilizing one of the other existing entrances you can ensure the ongoing safety of the Dulzura community while also providing public access to BLM open areas. Only in this way can you keep the majority of the hazardous traffic, hunting, sporting, and target shooting away from residential activities, families, pets and the children of this neighborhood.

ROAD DUST: All of the extra traffic will increase an already severe problem for the area- road dust. Our homes, yards, pets and children are already exposed to choking amounts of dust from the constant daily activities of the Border Patrol vehicles, adding to this would be an incredible burden on the longtime residents of our community.

Further, clear land/environmental abuse and violations are an ongoing problem in this area -even with the gate locked- which will only be more prevalent and harder for prevention/detection/citations and remediation. An increase in traffic will bring increase of shooting, which means an increased fire danger in an already hazardous wildfire area and to the properties and residences that are near this gate. One clear example of this is the fire we

recently had on Marron Valley road by target shooters shooting at a propane tank on BLM property which caused a major fire here this year. Leftover trash, targets, discarded cans, signs, old furniture and yes even discarded propane tanks. These pollutants combined with the frequent off trail vehicle use destroy the native chaparral and ecosystem. This creates long term damage the very habitats which support the game prey, birds and open areas that hunters, shooters, hikers, naturalists and bird watchers are using BLM lands for.

Chicken Ranch gate should remain LOCKED to continue the necessary control and supervision needed to enforce the local law, BLM rules and safety of the community. These rules and continuing enforcement by BLM are crucial and necessary in ensuring that the land is capable of sustained use- which must be a condition for any public use of public lands.

Thank you,

Mr. & Mrs. Merziotis

BLM_CA_Palm_Springs_South_Coast_RMP

From: D'Angeles, Camelen
Sent: Tuesday, December 20, 2011 1:32 PM
To: jamespsalvatore@aol.com
Cc: Kalish, John R; Hill, Gregory C; Roberts, Holly L
Subject: RE: palmsprings feedback // South Coast RMP

Thank you, Mr. Salvatore, for contacting us regarding the South Coast Plan. Your comments will be included in the official file.

Regards,
Cam D'Angeles
Management Assistant
Palm Springs – South Coast Field Office

-----Original Message-----
From: jamespsalvatore@aol.com [mailto:jamespsalvatore@aol.com]
Sent: Tuesday, December 20, 2011 9:49 AM
To: Cotterell, Gary L; D'Angeles, Camelen; West, Mary Lou
Subject: palmsprings feedback

name = Jim Salvatore
organization =
email = jamespsalvatore@aol.com
subject = South Coast RMP
FeedbackType = Comment
request_comment = James & Cassandra Salvatore
16627 Highland Valley Road
Ramona CA 92065
760-788-6885 760-531-4231

December 14, 2011

John Kalish, Field Manager
BLM Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs CA 92262

Re: South Coast Resource Management Plan Revision

Dear, Mr. Kalish,

We are in full support of Alternate D as it relates to Parcel 262-221 and its designation of Sale or Exchange.

We once again want to indicate our commitment to our offer made in August 2000 for an exchange of land owned by the James P. Salvatore Trust to the San Dieguito River Park JPA in exchange for land BLM Parcel 262-221. We have never wavered from that position and have followed this long process the plan revision has taken.

The BLM parcel has continued to cause problems for surrounding property owners with regard to property owners insurance due to deferred maintenance (brush clearing). We have the support of the San Dieguito River Park, we have a letter from 2004 from Steve Delgadillo, CDF Fire Marshall for our area supporting our effort in the proposed exchange, as well as County Board of Supervisor Dianne Jacob and former Congressman Duncan D Hunter Sr. and former Congressman Jim Bates.

We would hope that this exchange designation could be handled swiftly as a benefit to all parties concerned and change a publicly isolated parcel into a land with public access and high value habitat that we can all enjoy for generations.

Regards,

James Salvatore

username123 =
sentinal = Sentinal
page_referred_from = http://www.blm.gov/pgdata/content/ca/en/info/directory/fo-addresses.html
fo = 12
Submit = Send Request

BLM_CA_Palm_Springs_South_Coast_RMP

From: D'Angeles, Camelen
Sent: Tuesday, December 20, 2011 1:39 PM
To: smitch@ucr.edu
Cc: Kalish, John R; Hill, Gregory C; Roberts, Holly L
Subject: RE: palmsprings feedback // South Coast Draft Resource Management Plan...

Thank you, Mr. Mitchell, for contacting us regarding the South Coast Draft Resource Management Plan. Your comments will be included in the official file.

Regards,
Cam D'Angeles
Management Assistant
Palm Springs – South Coast Field Office

-----Original Message-----
From: smitch@ucr.edu [mailto:smitch@ucr.edu]
Sent: Tuesday, December 20, 2011 8:38 AM
To: Cotterell, Gary L; D'Angeles, Camelen; West, Mary Lou
Subject: palmsprings feedback // South Coast Draft Resource Management Plan...

name = Stephen Mitchell
organization = UCR Friends of the Santa Ana River email = smitch@ucr.edu subject = South Coast Draft Resource Management Plan...
FeedbackType = Comment
request_comment = Hi,

As an individual, I would like to urge you to put the emphasis on preserving the conservation resource values of the Santa Ana Wash. My reasoning is that this, and any, watercourse in Southern California is by definition special habitat and should be treasured. I also think that, heretofore, almost ALL emphasis has been placed on commercial and development values. So its now time to balance this by putting the strongest interest on habitat conservation and restoration.

Cordially,

Steve Mitchell
username123 =
sentinal = Sentinal
page_referred_from = http://www.blm.gov/ca/st/en/fo/palmsprings/Draft_Resource_Management_Plan_and_EIS.html
fo = 12
Submit = Send Request

BLM_CA_Palm_Springs_South_Coast_RMP

From: Charlotte A. Pienkos <cpienkos@tnc.org>
Sent: Tuesday, December 20, 2011 2:06 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Cc: William Tippets; Christopher Basilevac; agonzalez@tnc.org1; Christy Plumer; Mark Kramer; mpowelson@tnc.org; Robert Bendick
Subject: The Nature Conservancy's Response to the BLM South Coast (CA) Draft RMP/EIS
Attachments: The Nature Conservancy's South Coast Draft RMP Comments Submitted 12202011.pdf

To the RMP Team Lead:

Attached to this email, please find The Nature Conservancy's response to the South Coast draft RMP/EIS.

Thank you for the opportunity to comment.

Sincerely,

Charlotte Pienkos

Charlotte Pienkos
External Affairs Manager

cpienkos@tnc.org
direct: (213) 327-0104 ext. 4208
mobile: (213) 219-2824

The Nature Conservancy
South Coast and Deserts Region
601 South Figueroa Street
Suite 1425
Los Angeles, CA 90017

The Nature Conservancy
Protecting nature. Preserving life.™

nature.org

The Nature Conservancy
Protecting nature. Preserving life.™
601 South Figueroa Street, Suite 1425, Los Angeles, CA 90017 (213) 327-0104

December 20, 2011

RMP Team Lead
BLM Palm Springs—South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262

RE: The Nature Conservancy's Comments on BLM's South Coast Draft Resource Management Plan and Environmental Impact Statement (August 2011) and Recommendation to Adopt Alternative B

Dear Team Leader:

On behalf of the South Coast and Deserts region of The Nature Conservancy's California Chapter, thank you for the opportunity to comment on the Bureau of Land Management's (BLM's) South Coast draft Resource Management Plan and Environmental Impact Statement (draft RMP/EIS). BLM has been an important partner to the Conservancy since 1961, when the Conservancy embarked on its first public agency partnership with BLM to manage an old-growth forest in California. Throughout the years, our organizations have continued to work together across the western states toward the conservation of the nation's irreplaceable natural resources.

As an organization dedicated to the conservation of the lands and waters that plants and animals need to survive and as landowners within BLM's South Coast management area, we were pleased to note that the draft RMP/EIS provides a complete description of the land, its resources and its current status within the RMP area. The draft RMP/EIS also provided, with some exceptions that we note below, full descriptions of the potential activities that could occur, and impacts that could result from, adopting Alternative A (No Action Alternative), Alternative B (Conservation Alternative), Alternative C (Public Use Alternative) or Alternative D (Preferred Alternative).

Our comments focus on the San Diego Management Area, but many apply to the other management areas within the RMP geographic area. In general, we concur with the scope of the information, level of detail, and analyses in the draft RMP/EIS. However, <u>based on both BLM's information and analyses and the Conservancy's specific concerns articulated below, we recommend that BLM adopt Alternative B, rather than the Preferred Alternative.</u> Alternative B provides the greatest conservation value for habitats and species, allows reasonable public access and uses, and contributes economic value to the RMP area. Please note that the additional information and analyses that we recommend be added to the draft RMP/EIS may result in changes to Alternative D; in that event, our recommendation could change to support Alternative D.

The Conservancy undertook a thorough review of the draft RMP/EIS and developed a list of concerns and areas for improvement. We would welcome the opportunity to discuss them with you at any time and offer clarifications or additional input. Our specific comments are listed below according to their chapter and section number.

1.5.3.2 Consistency with Other Federal, State, Tribal and Local Governments: This section should include a reference that the state's NCCP and federal HCP processes provide important planning criteria for much of the federal lands within the RMP geographic area.

2.2 General Description of Each Alternative: The description of Alternative C (Public Use Alternative) states, "Public use and development of resources would be coordinated with local governments through flexible implementation of regional habitat conservation plans while adhering to BLM policy and guidance." We are concerned that "flexible implementation" of the regional HCPs is not defined. The NCCPs/HCPs have specified commitments for conservation and cannot allow uses that conflict with them. A fuller articulation of "flexible implementation" is required for a meaningful consideration whether existing NCCP/HCP commitments can be kept while enhancing public use.

Similarly, the description of Alternative D states it is a combination of Alternatives A, B and C and provides "a balance between authorized resource use and the protection and long-term sustainability of sensitive resources." Acknowledging BLM's multiple use and sustained yield mandate, Alternative D should not justify or include uses that conflict with or compromise the functioning of conservation plans and commitments in place or being planned within the South Coast RMP area.

2.3 Comparison of Alternatives (Table 2-1):

- *Under Vegetation Management Actions*, we believe that the application of this action - "Riparian areas would be exclusion areas for all major surface disturbance activities"- should apply to all the alternatives, including Alternative C;
- Because of concerns about spreading diseases and pests, such as mistletoe and golden spotted oak borer, collection of downed and dead wood for personal use should be controlled through permitting where disease or pest problems are known to occur;
- *Under Special Status Species,* all covered species under the various NCCP/HCP plans should be included within the RMP;
- BLM lands within existing or planned NCCP/HCPs should be treated as (and ultimately designated as) Areas of Critical Environmental Concern (ACECs), rather than as Wildlife Habitat Management Areas (WHMAs);
- *Under Wildland Fire and Fuels*, BLM should plan its suppression methods and techniques in concert with other land managers within existing and planned conservation land areas (e.g., NCCP/HCP preserves) because some techniques are inappropriate for certain habitat areas;
- Similarly, fuels management within conserved areas should be coordinated with other land managers;
- *Under Special Designations,* the proposed expansion of ACECs as described in Alternatives B and D are consistent with the existing or future conservation plans in which these potential expansions occur. We recommend that ACECs should be avoidance areas for rights-of-ways, including wind and renewable energy and other surface disturbance land uses;
- *Under Range Management – Livestock Grazing,* we recommend that livestock grazing be disallowed within existing and planned conservation land areas unless it can be demonstrated to be compatible with the conservation objectives;

- *Under Mineral Resources,* BLM lands within conservation land areas should not be open for mineral entry and locatable minerals extraction should not be permitted;
- *Under Recreation,* OHV access and use should be eliminated from BLM lands that are part of existing or planned conservation land areas, except as is consistent with approved commitments in those conservation plans;
- *Under Lands and Realty,* BLM lands within existing or planned conservation plans should be retained by BLM for management consistent with those plans, or if they are disposed of, they should only be transferred or sold to qualified entities that can manage them for conservation purposes.

2.3.4.1 Goals and Objectives: We are concerned with the objectives of making "… groundwater on public lands, where present, available for beneficial uses." Where groundwater is known or likely to support onsite and adjacent biological resources, the protection of groundwater resources should be the primary beneficial use, absent any other, preceding legal use of that water. Prior to BLM´s proposing or approving any pumping of groundwater from public lands or issuing federal permits or approvals for any action that would pump groundwater that may adversely affect riparian, phreatophytic or aquatic resources on public lands, BLM should require the applicant to demonstrate that any use of groundwater, (including required mitigation actions), will never have a significant adverse effect on those water-dependent resources.

2.3.5.1 Desired Plant Communities: The section on chaparral is lacking in clarification on what the desired protection means for conservation. We recommend that riparian habitat areas should be managed to the "no net loss" standard. Similarly, if existing oak woodland areas are to stabilize or expand (with no net loss in tree cover with minimal fragmentation), then the areal extent of oak woodlands should also not decrease.

2.3.7 Special Status Species: Special status species addressed by the RMP should include all covered species under the NCCP/HCP plans within the South Coast RMP geographic area. Species such as southwestern pond turtle, Thorne's hairstreak and Hermes copper butterflies, and vernal pool species warrant special attention where present in BLM lands.

2.3.7.3 Management Actions by Alternative (Table 2-4): To ensure consistency among the BLM lands that are part of an existing or planned conservation land area, those lands that are not already ACEC or Wilderness Study Area should be designated or treated as ACEC lands (or added to Wilderness, if appropriate). As has been committed to by BLM (1997 MOU with the US Fish and Wildlife Service, County of San Diego, City of San Diego, San Diego Association of Governments and CA Department of Fish and Game) for its lands within the San Diego County Multiple Species Conservation Program (MSCP), Multiple Habitat Conservation Program (MHCP) and Multiple Habitat Conservation Program/Open Space Program (MHCP/OSP), all of BLM's lands within a habitat (NCCP/HCP) planning area should be managed in a coordinated manner that is consistent with the conservation plans. This should be part of the commitment in this RMP.

2.3.8 Wildland Fire and Fuels: Fire suppression and fuels management will be increasingly important activities in light of predicted climate change. While the proposed approaches and methods are generally reasonable with regard to BLM lands within conserved land areas, to the extent practicable, BLM's fire suppression and fuels management approaches and plans should be coordinated with those of adjoining preserve lands.

2.3.14.2 Management Actions Common to All Alternatives, Locatable Minerals Management: BLM lands within existing and planned conservation land areas should not be approved for new mineral extraction or mining, as it is not a compatible activity with habitat and species conservation. Whenever possible, existing mineral leases should be retired.

2.3.16.3 Management Actions by Alternative, OHV Area Designations: As a general practice, any BLM lands within existing or planned conservation areas should be closed to OHV access or use unless that use conforms to the land management plans for the preserve area. The Santa Clara River is one of the few relatively free-flowing rivers within the RMP area and supports several endangered species, including salmonids. The Upper Santa Clara River ACEC should be closed to any new OHV use.

2.3.17.2 Management Actions Common to All Alternatives, Land Tenure: As noted previously, BLM lands within existing and planned conservation land areas should be designated or treated as ACECs, with the same level of protection and limited uses, consistent with the resource values of those conservation lands.

2.3.17.3 Management Actions by Alternative (Table 2-22) Sale of BLM properties to private owners within conservation planning areas should be limited to parcels whose conservation values have been identified and determined not to be a significant contribution to the conservation plan, and whose subsequent development/use does not pose a threat to adjoining conservation lands.

3.1.2.Geographic Setting: The RMP identifies 62 "special status species," but BLM lands occur within several regional NCCP/HCP planning areas in the South Coast area that have identified approximately 200 "covered species." The RMP should acknowledge those species and stipulate that management of BLM lands within those plan areas should be consistent with those species' conservation needs. This could be described and explained subsequently in Section 3.7 of the draft RMP/EIS.

3.7.4 Regional Habitat Conservation Planning: The Nature Conservancy has been a partner in the Las Californias Binational Conservation Initiative and continues to work to improve habitat conservation along the US-Mexico border. BLM has made important acquisitions in support of that effort, as has the Conservancy and other non-governmental organizations and governmental agencies. Alternatives (particularly B and D) that would continue BLM's participation in conservation of important habitat areas and limit uses to those appropriate for habitat and species' conservation are consistent with that planning effort and should be supported.

Also, wildland fires and fuel management are very important components of the land management and conservation element of the draft RMP/EIS. As noted, much of the vegetation within the BLM properties and potential expansion areas has an extensive history of wildfires, whose natural frequencies are increased by greater human use of the backcountry. The draft plan's discussion of federal, state and local fire suppression policies highlights the need for comprehensive and integrated fire planning and response. The plan must strike a balance between fire management zones, fire patrol roads, public access and the needs to manage for habitat and sensitive and special species. Where BLM lands are part of or adjacent to habitat conservation planning areas, there should be consistent fire management planning and response coordination with BLM and conservation plan land managers.

3.12 Special Designations and Lands with Wilderness Characteristics: Special former BLM parcels (totaling approximately 604 acres) on McGinty Mountain that are presently patented to The Nature Conservancy under the Recreation and Public Purpose Act (R&PPA) support threatened species. We

recommend that this section note that if these parcels are ever reverted to BLM, then the parcels should be afforded ACEC status to reflect their special biological values.

Alternatively, these parcels could revert to BLM and then be withdrawn into the San Diego National Wildlife Refuge. If that latter process were to occur, we request that BLM adopt protective management prescriptions over those parcels so that their management and protection status is equivalent to that assured through the conditions of the R&PPA until the withdrawn lands process is completed. Protective management prescriptions would include but not be limited to plant and animal conservation and management, hiking, photography and other passive recreation activities.

3.12.8 Areas of Critical Environmental Concern.: The potential expansion of ACECs per Alternatives B and D would be consistent with habitat conservation planning that has been completed or is expected to occur within the RMP geographic area. Because ACEC designation provides limitations on activities that are similar to those included in habitat conservation plans, expansion of ACECs is recommended. This would be particularly important to improve habitat connectivity among the various conservation plan reserve/preserve lands and along the US-Mexico border.

3.14 Mineral Resources: Mineral resource exploration and development have the potential to impact conservation lands. This section should provide more information regarding how BLM's draft RMP would address mineral resource exploration and development where the activities would occur within or adjacent to conservation lands. Also, this section should define requirements for monitoring, clean-up and restoration of mineral exploration and development activities, particularly sand and gravel activities.

3.15 Recreation: Existing and potential public recreation uses, particularly in the San Diego Management Area, are adequately described. As noted in the draft RMP/EIS, increased use in recent years has impacted some areas, especially in the Border Mountains area. It is/will be important for BLM's recreation use plans to be developed with acknowledgement of recreation use plans developed by the habitat conservation preserves. The Nature Conservancy manages, for public access and passive recreation, over 600 acres under the R&PP Act within the Borderlands Mountains area.

3.16 Transportation and Public Access: Vehicle access and use of BLM lands have a potential to impact resource values on BLM lands and adjoining conservation lands. Within San Diego County, BLM has restricted motorized vehicle access and use from the most sensitive lands. As important as the restricted status is, enforcement of those restrictions is even more important. In San Diego County, the habitat conservation program has initiated enforcement patrols with the County Sheriff and Department of Fish and Game. The inclusion of BLM into the San Diego County enforcement effort is recommended.

3.17 Lands and Realty: As noted above, The Nature Conservancy manages over 600 acres of BLM lands obtained through the R&PP Act. The current processes that direct BLM's disposal of lands appear to be reasonable, but apparently do not specifically address the relatively recent implementation of habitat conservation planning efforts. Those planning efforts, and the identification of sensitive lands, should be part of the consideration by BLM when it considers whether and how to dispose of its properties. Where BLM lands are included in an approved conservation plan, such as much of the western part of the Border Mountain lands within the San Diego County Multiple Species Conservation Plan (MSCP), disposal and transfers should be consistent with the conservation plan. The BLM has entered into a Memorandum of Understanding with the MSCP, which commits BLM to managing its lands consistent with the goals of that plan.

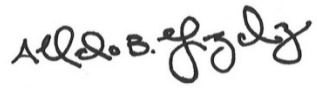
3.19.4 Lands and Realty Management: The brief description and discussion of renewable (solar) energy and wind energy ROWs and sites does not provide sufficient information for the reviewer to determine how much analysis should be included in the draft RMP/EIS. This section should include more information on solar and wind energy facilities on nearby non-BLM lands and the potential for applications related to these facilities, including their associated transmission infrastructure.

4.0 Environmental Consequences: The draft RMP/EIS does not include an analysis of renewable and wind energy developments and associated infrastructure that could occur on BLM lands. These activities pose significant potential impacts to BLM lands given the significant current and foreseeable interest by the energy industry in locating generation facilities on public lands and the potential for solar and wind resources on BLM lands. This necessary analysis was omitted from the impact analysis section 4.2 and must be added and evaluated by BLM in its determination of a preferred alternative.

4.2.18 Impacts to Social and Economic Values: The economic analysis of the alternatives indicates that both Alternatives B and D have gross and net economic benefits compared to Alternative A and substantially more benefits than Alternative C. The analysis suggests that either Alternative B or D would provide net economic benefit to within the RMP area.

Thank you for the opportunity to offer concerns and suggestions for improvement to the draft RMP/EIS. If you have questions about our specific recommendations or our support for Alternative B, please contact Bill Tippets, San Diego Project Director, at btippets@tnc.org or (619) 209-5830 extension 4408.

Sincerely,



Alfredo Gonzalez
Director
South Coast and Deserts Region
California Chapter

BLM_CA_Palm_Springs_South_Coast_RMP

From: Ann Hough <information@escondidocreek.org>
Sent: Tuesday, December 20, 2011 2:08 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: South Coast Resource Management Plan - Public Comment
Attachments: LOS_Santa_Margarita.pdf; ATT00001.htm

Dear Mr Kalish,

Attached is a public comment from the Board of The Escondido Creek Conservancy regarding the South Coast Resource Management Plan.

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov

The Escondido Creek Conservancy

P.O. Box 460791
Escondido, CA 92046-0791
www.escondidocreek.org
information@escondidocreek.org
760.471.9354

December 19th, 2011

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Everett Delano of Delano Law Offices

Dear Mr. Kalish:

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Steve Barker

Steve Barker
President
The Escondido Creek Conservancy

The Escondido Creek Conservancy (TECC) is a non-profit, public benefit, corporation dedicated to the preservation and protection of the natural open space within the Escondido Creek watershed. We support educational programs and compatible outdoor recreation within the watershed for the benefit of all residents of the area.

BLM_CA_Palm_Springs_South_Coast_RMP

From: Jui Ing Chien <jchien@parks.lacounty.gov>
Sent: Tuesday, December 20, 2011 4:42 PM
To: Hill, Gregory C
Cc: Norma E. Garcia; Larry Hensley; Joan Rupert; Stephen R. Copley; Clement Lau; Robert Ettleman
Subject: Response to BLM South Coast Resource Management Plan EIS
Attachments: DPR_Trails_2011R.dbf; DPR_Trails_2011R.prj; DPR_Trails_2011R.sbn; DPR_Trails_2011R.sbx; DPR_Trails_2011R.shp; DPR_Trails_2011R.shp.xml; DPR_Trails_2011R.shx; Response to BLM South Coast EIS.pdf

Mr. Hill,

Please find the attached Response Letter and the County Trails GIS shapefiles for the South Coast RMP EIS .
Please let me know if you have any questions. Thank you.

Jui Ing Chien | County of Los Angeles Department of Parks and Recreation - Planning and Development Agency | 510 South Vermont Avenue, Los Angeles , CA 90020 | ph# 213.351.5129 fax# 213.639.3959 | Business Hours 6:30 A.M. to 5:00 P.M. Monday through Thursday

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of Bruce nelson <hatch69@sbcglobal.net>
Sent: Tuesday, December 20, 2011 6:13 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 20, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

.Water shapes our world both civilized and in the wild.Let the rivers that are still untouched by the greedy hands of the Army Corps of Engineers stay that way

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Mr. Bruce nelson
1909 Capitol Ave Ste 201
Sacramento, CA 95811-4243

BLM_CA_Palm_Springs_South_Coast_RMP

From: Jeff Brown <jbpaul1960.jb@gmail.com>
Sent: Tuesday, December 20, 2011 7:05 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP; Hill, Gregory C
Cc: Kalish, John R
Subject: ACSD Comments - BLM South Coast Draft Resource Management Plan and Environmental Impact Statement
Attachments: ACSD COMMENTS_final_BLM DRAFT RMP EIS.docx; ACSD San Diego County Bio Guidelines (07-30-10)rev.pdf; DOI_FWS_Migratory Bird Memo.pdf; ACSD_BLM MOU.pdf

Please see attached comments and supporting documents.

P.O. Box 17411
San Diego, CA 92177
Web: www.AlliedClimbers.org

South Coast RMP
BLM Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262

December 20, 2011

Subject: Comments on the South Coast Draft Resource Management Plan Revision and Draft Environmental Impact Statement

Thank you for the opportunity to comment on the BLM South Coast Draft Resource Management Plan Revision and Draft Environmental Impact Statement. (Hereinafter "The Planning Document").

Allied Climbers of San Diego

The Allied Climbers of San Diego (ACSD) is a 501(c) (3) California Non-Profit Public Benefit Corporation supporting and representing climbers' interests in the many forms of recreational rock climbing—traditional climbing, crack climbing, sport climbing, and bouldering. ACSD promotes responsible use and sound management of climbing resources. We encourage an ethic of personal responsibility, self-regulation, conservation, and minimum impact practices. ACSD represents the collective interests of thousands of San Diego and Southern California climbers.

ACSD accomplishes its goals by working to educate interested parties involved in access issues that climbing resources are valuable recreational resources to the public and that climbing is a legitimate, low impact, human powered activity. ACSD advocates to federal, state, and municipal land managers concerning public lands usage; works closely with the Access Fund (a national climbing advocacy organization); works with federal, state, and municipal land managers and interest groups to plan and implement public land management actions and protocols; provides resources and volunteers for conservation and resource management projects; and develops and disseminates climber related information and education. For more information see: www.alliedclimbers.org

ACSD Comments to The Planning Document

After a thorough review of The Planning Document, ACSD has identified numerous inconsistencies, inaccuracies and deficiencies which, if adopted as written, will result in unnecessary, unjustified and legally unsupportable restrictions on access to public lands and recreation. In addition, poor organization, missing references and unclear maps fail to convey technical details of the plan, which prevents the public from providing substantive comments.

Because of the aforementioned issues, ACSD is unable to support any option other than Alternative A, including the BLM preferred Alternative D. ACSD encourages the BLM to take a step back to revise The Planning Document to ensure it fulfills the BLM's responsibilities under NEPA.

ACSD's specific comments regarding The Planning Document are detailed in the following sections, organized in order of occurrence, not necessarily importance.

Chapter 1 - Introduction

1. Page 17: "*During implementation of the new RMP, additional documentation may be required to comply with NEPA, such as environmental assessments (EAs) for site-specific actions. Site specific actions, also known as Implementation or Activity Plans, may include Recreation Area Management Plans, ACEC Plans, Cultural Resource Management Plans, Habitat Management Plans, or Communication Site Plans, to name a few.*"

"Raptor Management Plans" should be added to the above statement as a type of *Implementation or Activity Plan* requiring further NEPA review. The Raptor Management Best Management Practices (BMPs) in Appendix E establish habitat management protocols that have not undergone proper NEPA analysis and public scoping. These BMPs (Raptor Management) should be stricken from Appendix E entirely.

2. Page 18 lists other related plans that the SCRMP will be consistent with. Many of these land use and planning documents were specifically developed and approved for activities and implementation for resources elsewhere. By stating that certain lands within this plan will be managed consistent with these so-called standards already in effect removes the public's ability to effectively comment on the extent of this plan, at this location of resources, today. These related plans have no standing as national standards that have undergone proper public scoping. Their use as such is a violation of NEPA protocol; they should be removed from The Planning Document entirely.

3. Map resolution within the draft BLM SCRMP PDF available online and on CD is inadequate. Legends are difficult to discern or illegible, and area boundaries are left unclear to readers. Higher resolution maps and/or GIS shapefiles are necessary to provide adequate detail for public review and future use of the document.

Chapter 2 Description

1. Table 2-1 does not include any information under the resources "Wildlife" or "Special Status Species" in regards to raptor management referenced in Appendix E. This is further addressed below.

2. Description of Alternatives: Recreation has not been appropriately analyzed, or provided for, in the alternatives—especially Alternative D. This is further addressed below.

3. 2.3.15 Recreation: Rock climbing should be added to the list of recreational opportunities in all alternatives—especially Alternative D. This is further addressed below.

4. 2.3.15.1 Goals and Objectives

This section states: BLM recognizes that natural resource-based recreation and tourism is a significant economic contributor in most communities adjacent to public lands. *Priorities for Recreation and Visitor Services* (DOI BLM 2003) states, "Our multiple-use mission is to serve the diverse outdoor recreation demands of visitors while helping maintain the sustainable conditions needed to conserve their lands and their recreation choices."

This document (DOI BLM 2003; p.79) also sets three primary goals for the BLM recreation program:

1) Improve access to appropriate recreation opportunities on BLM-managed public lands and waters.
2) Ensure a quality experience and enjoyment of natural and cultural resources on BLM-managed public lands.
3) Provide for, and receive, fair market value for recreation.

Chapter 4 - Environment Consequences
http://www.blm.gov/pgdata/etc/medialib/blm/ca/pdf/palmsprings/scrmp.Par.88267.File.dat/09%20Chapter%204%20FINAL.pdf, in describing affects to the environment, states that recreation will increase:

> **Recreation (Alt D)**
> Under Alternative D, the amount of recreation activity on BLM land would be increased. However that would not translate into a substantial impact to the planning area economy. Increases in recreation activity under Alternative D would be generally viewed as beneficial by the population of the Planning Area.
> **Social and Cultural Values**
> Under Alternative D, there are no significant direct effects on social or cultural values from changes in recreation management. (p.425)

However, under heading 2.3.15 Recreation (beginning on p.79), as noted above: 1) there is no mention of rock climbing as an [appropriate] activity, 2) there is no identified measurable increase in recreation (contrary to the claim in Chapter 4 that Alternative D increases recreation), and 3) though the lands leased to San Diego County Parks and Recreation (which reside within the South Coast Extensive Management Areas) should be managed as Extensive Recreation Management Areas (ERMAs)—"These areas, which constitute the bulk of the public lands, give visitors the freedom of recreation choices with minimal regulatory constraints. The ERMAs include all public land exclusive of SRMAs [Special Recreation Management Areas]. Recreation management within ERMAs would be limited to custodial actions only. Custodial actions are those necessary to manage dispersed activities, visitor health and safety, and user and resource conflicts."—the lands have been identified as preserves by San Diego County Parks and Recreation, which has further and unnecessarily limited public access and recreation such as rock climbing within their RMP (Resource Management Plan).

Without undergoing a proper NEPA analysis BLM has, by default through leasing these lands to Parks and Recreation under the Recreation and Public Purposes Act (which was intended to increase public recreation on BLM public lands, not restrict it), established that these areas should be managed as preserves. In fact, within The Planning Document recreation in these areas has been "limited to hiking and horseback riding only" (see Chapter 3, 3.15 Recreation).

San Diego County Parks and Recreation has unlawfully restricted public access and dispersed recreation on these lands by establishing overly restrictive management plans toward recreation, especially toward rock climbing.[1] Restricting rock climbing on BLM lands within the El Capitan Preserve—the lands leased

[1] El Capitan Preserve RMP
http://www.sdcounty.ca.gov/reusable_components/images/parks/doc/El_Capitan_FINAL_RMP_with_Figures_June_2009.pdf See unnecessary and **legally unsupportable** restrictions: p67 (Golden Eagle (*Aquila chrysaetos*), *Management Conditions*), p73 (C.2.4, C.2.5), p74 (C.5.2), p78 (D.7.2); see p17 for map showing *authorized* trails (a **single** trail that circumscribes the "preserve," making all other entries [and activities] into the these resources un-authorized). Also see ACSD Comment letter to San Diego County Bio-Guidelines' unnecessary and **legally unsupportable** golden eagle *permanent* buffer restrictions http://www.co.san-diego.ca.us/dplu/docs/Biological_Guidelines.pdf (included as separate attachment).

by San Diego Parks and Recreation—is unnecessary, has not been done in compliance with NEPA policy, has not been established through the best available scientific data, has not undergone public scoping pursuant to NEPA requirements, and is in direct conflict with the intent of the Recreation and Public Purposes Act passed by Congress having the express purpose to provide for increased recreation, or for public purposes. As defined by the act, (d) *Public purpose* means for the purpose of providing facilities or services for the benefit of the public in connection with, but not limited to, public health, safety or welfare. Use of lands or facilities for habitation, cultivation, trade or manufacturing is permissible only when necessary for and integral to, i.e., and essential part of, the public purpose.

The Planning Document needs to address this 'disconnect' by developing language which establishes that lands leased to San Diego County Parks and Recreation be managed for increased recreation (including rock climbing), pursuant to Extensive Recreation Management Areas—not as preserves that restrict public use. Further, that golden eagle buffer zones comply with the US FWS [**national**] standards defined for recreation (see below for further comments re: these standards).

Chapter 3 Affected Environment

1. 3.15 Recreation, South Coast Extensive Management Area (p.118): The 6th sentence should be revised to read **"These areas should be limited to sustainable recreational uses."** The sentence as it is currently written is not consistent with the management requirements of ERMAs, or DOI BLM 2003 which clearly states, "Our multiple-use mission is to serve the diverse outdoor recreation demands of visitors while helping maintain the sustainable conditions needed to conserve their lands and their recreation choices."

2. Section 3.19.6 vastly underestimates the economic effects of recreation on South Coast BLM lands. Rock-climbing alone in San Diego supports 8 large commercial and university indoor training walls, where climbers practice and train for climbing outdoors. Some of those outdoor climbing resources are on BLM land, such as El Cajon Mountain within lands leased to San Diego County Parks and Recreation, and numerous boulder covered hillsides in San Diego and Riverside counties. Hikers, bikers, hunters, and off-roaders are even more numerous.

Management protocols for public lands administered by the BLM need to be consistent. Lands administered through the Recreation and Public Purposes Act as *leased lands* to San Diego County Parks and Recreation need to be managed in a fashion that is consistent with other BLM Extensive Recreation Management Area (ERMA) lands. Arbitrarily establishing so-called acceptable recreation activities on said lands is unacceptable without undergoing a NEPA process that includes public scoping and thoroughly documents a specific and verifiable scientific based need that is clearly authorized by regulatory statute.

Chapter 4 Environmental Consequences

Recreation (Alt A); Social and Cultural Values

This section states: Alternative A will have no significant direct effects on social and cultural values. Recreation is highly valued in southern California and the area is home to a wide array of internationally significant recreational facilities such as Disneyland and Sea World. However, no recreational facilities or campsites exist on the 278 BLM parcels within the Planning Area. Recreational opportunities are

therefore limited primarily to day-use rather than camping or back-packing trips. Popular activities include sightseeing, hiking, rock climbing, rock hounding, photography, bird watching, horseback riding, hunting/shooting, or off-highway vehicle use. Management of recreation in the Planning Area under Alternative A will not have significant effects on the values associated with recreation in southern California. (p.400)

Omission of this statement from all other alternatives (B, C, and D) effectively establishes that those alternatives *will* "have significant effects on the values associated with recreation in southern California."

Pursuant to the BLM's multiple-use mission, and the Chapter 1 Introduction statement regarding implementation and additional documentation required to comply with NEPA (p.17), **at minimum** all alternatives should include the following language regarding recreation:

"Popular activities include sightseeing, hiking, rock climbing, rock hounding, photography, bird watching, horseback riding, hunting/shooting, or off-highway vehicle use. Management of recreation in the Planning Area under Alternative [B,C,D] will not be significantly impacted, or restricted without proper analysis and public scoping through Environmental Assessments of site specific action plans."

In addition to not providing for **at minimum** dispersed recreation, alternatives B, C and D fail to address the fact that, as noted above, "no recreational facilities or campsites exist on the 278 BLM parcels within the Planning Area." In fact, The Planning Document is completely silent on this issue. It is not unreasonable for the public to desire that it have access to its lands—for recreation and campsites [camping]—so that it can enjoy recreation that is not increasingly dependant on expensive visits to pay-for-recreation facilities, such as "Disneyland and Sea World."

ACSD strongly believes The Planning document should establish a mechanism that provides for evaluation of the resources identified as the "278 BLM parcels within the Planning Area" to indentify appropriate areas that can be developed into future recreational facilities and campsites [campgrounds].

Recreation (Alt B)

This section states: Recreational activity is encouraged under Alternative B, and a modest increase is projected. This increase in recreational activity will not have a significant economic or cultural effect on the five-county Planning Area. (p.409)

The following language should be added— **at minimum**:

"Popular activities include sightseeing, hiking, rock climbing, rock hounding, photography, bird watching, horseback riding, hunting/shooting, or off-highway vehicle use. Management of recreation in the Planning Area under Alternative [B,C,D] will not be significantly impacted, or restricted without proper analysis and public scoping through Environmental Assessments of site specific action plans."

Recreation (Alt C)

This section states: Under Alternative C the amount of recreation activity on BLM land would increase substantially. However, it would not have a significant effect on the economy of the Planning Area.

Similarly, this increase would not have any significant effect on social or cultural values in the Planning Area.

Social and Cultural Values

The increase in recreation activity under Alternative C would have no significant direct effects on social and cultural values within the Planning Area. (p.417)

The following language should be added— **at minimum**:

"Popular activities include sightseeing, hiking, rock climbing, rock hounding, photography, bird watching, horseback riding, hunting/shooting, or off-highway vehicle use. Management of recreation in the Planning Area under Alternative [B,C,D] will not be significantly impacted, or restricted without proper analysis and public scoping through Environmental Assessments of site specific action plans."

Recreation (Alt D)

This section states: Under Alternative D, the amount of recreation activity on BLM land would be increased. However that would not translate into a substantial impact to the planning area economy. Increases in recreation activity under Alternative D would be generally viewed as beneficial by the population of the Planning Area.

Social and Cultural Values

Under Alternative D, there are no significant direct effects on social or cultural values from changes in recreation management. (p.425)

The statement under **Recreation (Alt D)** that "Under Alternative D, the amount of recreation activity on BLM land would be increased." is not supported by any part of the Planning Document.

Please address this disconnect—a FINAL EIS must show clearly how Alternative D has the effect of "increased" recreation.

The following language should be added— **at minimum**:

"Popular activities include sightseeing, hiking, rock climbing, rock hounding, photography, bird watching, horseback riding, hunting/shooting, or off-highway vehicle use. Management of recreation in the Planning Area under Alternative [B,C,D] will not be significantly impacted, or restricted without proper analysis and public scoping through Environmental Assessments of site specific action plans."

<u>Chapter 6 Glossary</u>

1. Best Management Practices are defined in the glossary as *"BMP / Best Management Practice. A practice, or a combination of practices, determined by a state or a designated planning agency to be the most effective, practicable means of preventing or reducing the amount of pollution generated by nonpoint sources to a level compatible with water quality goals."*

How does raptor management fit into the definition of preventing or reducing pollution?
Raptor Management does not fit into this definition and does not belong as a part of Appendix E—it should be removed entirely.

2. Please add WHMA to glossary.

Appendix C Results of Scoping

1. The Map which shows the South Coast Management Area is of very poor resolution. Freeway names, locations, and legend items are indecipherable (p.5). Please improve quality of attached map.

Appendix E Best Management Practice - Section C. Best Management Practices for Raptors

Provided below are numerous reasons supporting ACSD's request to have Section C completely removed from Appendix E Best Management Practices. Further, that no part of Section C warrants inclusion in The Planning Document.

1. There are no page numbers in Appendix E.

2. For NEPA compliance, this section of the appendix needs to be addressed in a separate environmental document altogether—requiring a separate EIS at the National level of the US FWS. An entire management strategy that has not undergone proper environmental review is not in compliance with NEPA.

3. Raptor BMP's should be focused on species that need active management, such as TES (Threatened, Endangered and Sensitive) species and special status species.

4. In this section "guidelines" are referred to numerous times, yet no reference is provided.

5. It appears Section C is copied from another Management Plan (Kanab RMP) from the state of Utah. These best management practices are **not** a nationally accepted standard which has been properly vetted through a thorough NEPA process. There is no National or California guideline BMP for management of raptors which relates to human recreation. The BLM South Coast Field Office should not attempt to create this type of BMP within The Planning Document. A BMP of this type is clearly beyond the scope of a Field Office Resource Management Plan.

6. Specific management actions for BLM resources (biological) belong in the appropriate location within The Planning Document. Management actions addressing species belong in Chapter 3 within the discussion of wildlife.

7. Attaching species specific management strategies as an appendix and not referencing them as raptor BMP's anywhere in The Planning Document is misleading and appears as either an afterthought to the planning process or a way to sneak through radical land management policies that would effectively close hundreds of acreages of public lands for non-sensitive species.

8. All resource management decisions need to be fully analyzed and addressed per NEPA.

9. It is unclear which alternative these BMP's would be associated with as these BMP's are not referenced in Table 2-1 or mentioned anywhere else in The Planning Document.

10. Paragraph 2: **This section incorrectly states** "All raptors in the South Coast Planning Area are considered to be Special Status Species by the BLM."

    a. Many raptors are common species found in abundance in this region and have no need for extreme management actions as population numbers are healthy and thriving—they are **not** special status or sensitive species.
    b. SCRMP Chapter 2, Page 2, 3.1.2., third paragraph states: Special Status Species are clarified to be: "*a species that is listed by the federal government as endangered, threatened, or as a candidate species, by the State of California as endangered, threatened, or rare, or by the BLM as a Sensitive Species."* There is no mention of raptors as a whole because they are not considered special status species.
    c. *SCRMP* Chapter 3, Section 7 Special Status species correctly lists the Special Status Species in Table 3-4. 62 species are identified—only 3 raptor species are found on this list (burrowing owl, California condor, and northern goshawk).
    d. Section 3.7.3. BLM Sensitive Species further clarifies that there are 36 BLM sensitive species on BLM lands in the south coast planning area included in table 3-4. Again, only 3 raptor species are included (burrowing owl, California condor, and northern goshawk).
    e. The definition of special status species can be found at http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/im_attachments/2009.Par.13736.File.dat/IM2009-039_att1.pdf ; the definition states that "*BLM special status species are: (1) species listed or proposed for listing under the Endangered Species Act (ESA), and (2) species requiring special management consideration to promote their conservation and reduce the likelihood and need for future listing under the ESA, which are designated as Bureau sensitive by the State Director(s). All Federal candidate species, proposed species, and delisted species in the 5 years following delisting will be conserved as Bureau sensitive species."*

11. Management actions that close public lands must only be done when the need for such action has been thoroughly documented. There is no regulatory requirement for closing public lands to all human activity due to the simple presence of a raptor nest, suitable raptor habitat, or even raptors themselves if they are not TES species, or eagles covered by the BGEPA.

12. Paragraph 2 lists the MBTA as the regulatory authority for protection of all raptors. The MBTA is not a land use zoning authority, does not mandate closure of public lands and is clearly defined as prohibiting the "pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention . . .

for the protection of migratory birds . . . or any part, nest, or egg of any such bird." (16 U.S.C. 703).

Related to federal agency compliance with the MBTA is EX. ORD. NO. 13186. RESPONSIBILITIES OF FEDERAL AGENCIES TO PROTECT MIGRATORY BIRDS Ex. Ord. No. 13186, Jan. 10, 2001, 66 F.R. 3853:
http://ceq.hss.doe.gov/nepa/regs/eos/eo13186.html

Pursuant to the order:

Sec. 2. Definitions. For purposes of this order:
(a) "Take" means take as defined in 50 C.F.R. 10.12, and includes both "intentional" and "unintentional" take.
(b) "Intentional take" means take that is the purpose of the activity in question.
(c) "Unintentional take" means take that results from, but is not the purpose of, the activity in question.

50 C.F.R. 10.12--
Take means to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to pursue, hunt, shoot, wound, kill, trap, capture, or collect.

It is extremely important for this federal agency (BLM) to recognize that the definition of take under the MBTA did not change with issuance of Ex. Ord. No. 13186. Neither did the MBTA's force of law. The intent of the order was to instruct and enhance Federal Agency cooperation under the requirements of the MBTA, NOT unnecessarily restrict public access to resources for the purpose of recreation if the resources can also be identified as suitable for nesting.

The Planning Document's use of the MBTA and Ex. Ord. No. 13186 as authority for the restrictive language pertaining to recreation, and management of raptors and raptor 'habitat,' is unsuitable and a gross interpretation of both the act and the order. (Also see 17 below).

13. Disturbance is not included in the definition of Take under the MBTA. Closing an area (buffer) around a nest to limit disturbance is not authorized, endorsed or mandated by the MBTA. Limiting disturbance during critical life stages is appropriate for endangered and threatened species and required by the ESA and BGEPA, not the MBTA.

14. Closing public lands to projects or activities such as hiking or rock climbing is a radical misinterpretation of the MBTA and the authority it provides to federal agencies to protect non-sensitive species.

15. By stating—as The Planning Document does—that all raptors regardless of species, abundance, sensitivity, population numbers, etc. will be managed as if they are special status species neglects the particular species that truly need focused attention and management. Species must be managed based on their sensitivity and conservation/protection status and management must be consistent and appropriate for the listed status. Increased protection measures for species not listed as endangered or threatened takes scarce resources away from

managing species that are listed, further compromising the long-term viability of 'listed' species.

16. Paragraph 3: Planning at this level with significant effects on the public and BLM resources must be subject to proper NEPA review and public scoping.

17. The protection of occupied and unoccupied nests is not mandated by the MBTA. The MBTA is not a land use or zoning authority and does not regulate habitat. In fact, ***United States Department of The Interior, Fish and Wildlife Service Memorandum MBPM-2, April 15, 2003*** (included as a separate attachment), intended for the explicit purpose of "clarifying the application of the Migratory Bird Treaty Act (MBTA) to migratory bird nest destruction, and to provide guidance for advising the public regarding this issue"—clearly states that the MBTA does not contain any prohibition that applies to a migratory bird nest alone (without birds or eggs) provided that no possession occurs during the destruction.

    Given the Fish and Wildlife Service direction on this issue, it should be reasonably inferred that if nest destruction—**destruction of the primary habitat of a migratory bird**—is not covered by the MBTA, than use of the MBTA as a land use zoning authority is a gross interpretation and application of the Act.

18. Recreation: This section states rock climbing would be authorized only in areas where there are no conflicts with cliff nesting raptors. This statement—and any statement of the kind which neglects to *appropriately* set *necessary* thresholds—should not be included in the FINAL DRAFT of The Planning Document. Severely restricting recreation due to the presence of common raptor species is unnecessary, unauthorized by statute, legally unsupportable, and unduly takes away the public's right to enjoy public lands.

19. Attachment 2 - Nesting Periods and Recommended buffers for raptors in South Coast Planning Area:
    a. This table is a modified version from the USFWS Utah Field Office Guidelines for raptor protection from human and land use disturbances. This document prepared in a field office in Utah is not a national standard and is not appropriate for this region.
    b. Species specific data from Utah is not regionally appropriate for southern California.
    c. The Utah Guidelines are meant for **projects** and are not intended to address ongoing or existing activities or recreation such as hiking or rock climbing.
    d. Spatial buffer distances are not supported with scientific references or justification for the buffer distance for each species.
    e. Spatial buffer distances are arbitrarily assigned and not based on the needs of each specific species. The 3 raptors given 1 mile buffers appear to have been given this distance based on the status of the species at the time of publishing (2002), listed as endangered or threatened. This is also represented in that all owls (except one) get a 0.25 mile buffer and every other raptor gets a ½ mile buffer. Arbitrary and random assignment of spatial buffer closures unnecessarily restricts public access.
    f. The Bald and Golden Eagle are included in this table with 1 and 0.5 mile seasonal buffer outlined. The MOU between the BLM and USFWS (see http://www.fws.gov/migratorybirds/Partnerships/BLM%20EO13186MOU.pdf) requires that the BLM use existing guidance for eagles—including golden eagles (FWS

National Bald Eagle Management Guidelines, see - http://www.fws.gov/pacific/eagle/NationalBaldEagleManagementGuidelines.pdf). The Raptor Management BMP's are not consistent with the guidance provided in the National guidelines. Recreation (including rock-climbing) fits under category F for establishing buffer zones: "**Category F. Non-motorized recreation and human entry** (e.g., hiking, camping, fishing, hunting, birdwatching, kayaking, canoeing). No buffer is necessary around nest sites outside the breeding season. If the activity will be visible or highly audible from the nest, maintain a 330 foot buffer during the breeding season, particularly where eagles are unaccustomed to such activity."

g. The second column includes NN2 with no clarification as to what this means.
h. Buffer sizes and seasons need to be focused on species that need additional protection from disturbance (TES species) and not common raptor species.
i. Revise Attachment 2 to reflect actual special status species.
j. Revise Attachment 2 to reflect buffer distances that are supported by scientific data and consistent with existing guidelines (Bald Eagle Guidelines).
k. Revise Attachment 2 to reflect nesting seasons appropriate for the region

Appendix I Recreation

1. Fails to include rock-climbing as a recreational activity.

Opportunities

ACSD can assist the BLM in the development of effective management strategies that address resource concerns on public lands used by climbers. But to do this, it is imperative that resource management actions are based on sound science, common sense and clear legal authority. ACSD has a signed MOU (included as a separate attachment) with the South Coast Field Office which was established to facilitate working together on exactly these types of issues. ACSD understands the BLM's mission and the requirements that it must follow as it implements its tasks to manage the public's lands in a manner that both protects the resource and provides for much needed recreation.

Pursuant to our jointly signed MOU, ACSD stands ready to work closely with the BLM to revise and restructure The Planning Document so that the FINAL document reflects the goals and objectives of the agencies multiple-use mission to serve the diverse outdoor recreation demands in the San Diego region.

Again, thank you for the opportunity to comment.

Sincerely,

Jeff Brown - Access Director
Allied Climbers of San Diego
www.alliedclimbers.org
An Access Fund Affiliate
www.accessfund.org

4878 Monroe Ave.
San Diego, CA 92115-3245
Phone: (619) 508-4665
Web: www.AlliedClimbers.org

Bobbie Stephenson
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road Suite B
San Diego, CA 92123
Bobbie.stephenson@sdcounty.ca.gov

July 30, 2010

Subject: Proposed Revisions to Biological Resources Guidelines for Determining Significance and Technical Report Format and Content Requirements.

Dear Bobbie Stephenson,

My name is Jeff Brown. I am the Executive Director of the Allied Climbers of San Diego, Inc. I write to introduce the organization I represent and to comment on the Proposed Revisions to Biological Resources Guidelines for Determining Significance and Technical Report Format and Content Requirements.

Allied Climbers of San Diego

The Allied Climbers of San Diego (ACSD) is a 501(c) (3) California Non-Profit Public Benefit Corporation supporting and representing climbers' interests in the many forms of recreational rock climbing—traditional climbing, crack climbing, sport climbing, and bouldering. ACSD promotes responsible use and sound management of climbing resources. We encourage an ethic of personal responsibility, self-regulation, conservation, and minimum impact practices. ACSD represents the collective interests of thousands of San Diego and Southern California climbers.

ACSD accomplishes its goals by working toward educating interested parties involved in access issues that climbing resources are valuable recreational resources to the public and that climbing is a legitimate, low impact, human powered activity. ACSD advocates to federal, state, and municipal land managers concerning public lands usage; works closely with the Access Fund (a national climbing advocacy organization); works with federal, state, and municipal land managers and interest groups to plan and implement public land management actions and protocols; provides resources and volunteers for conservation and resource management projects; and develops and disseminates climber related information and education.

Restriction of Public Recreation

Due to inaccuracies and use of inappropriate standards the County of San Diego's Biological Resources Guidelines, as written, are unnecessarily restrictive of public recreation.

Guidelines for Determining Significance for Biological Resources

1. Table 2 - County of San Diego Sensitive *Plant* List (page 42- 47):
    - This list is inconsistent with current CDFG and USFWS species status information. See http://www.dfg.ca.gov/wildlife/nongame/ and http://www.fws.gov/endangered/
2. Table 3 - County of San Diego Sensitive *Animal* List (page 48-50)

- This list is inconsistent with current CDFG and USFWS species status information. See http://www.dfg.ca.gov/wildlife/nongame/ and http://www.fws.gov/endangered/

(Examples- Falco peregrinus anatum was delisted in California in November 2009; Aquila chrysaetos is not a California endangered species and has never been listed as endangered or threatened under CESA or ESA; Eucyclogobius newberryi is a federal endangered species not threatened)

- The turkey vulture is included in Group 1 species. Please explain how defining the turkey vulture as a sensitive species meets the guarantee that "*These Guidelines were created based on the best available science and most common standards followed by the wildlife agencies, conservationists and biologists.*"

- The turkey vulture is a common wildlife species that receives no special protection from the State of California or USFWS. The turkey vulture is listed under the MBTA which provides protections against direct take of the species. However, the MBTA is not a land or recreation zoning statute and does not apply.

- Including the turkey vulture in Group 1 species is not practical due to its abundant population and its extensive range which encompasses all of South America and a majority of North America. It is as common as the *common* raven. This species should be moved to a more appropriate protection category based on wildlife agency standards.

3. The sensitive plant and animal lists included in Table 2 and 3 are used to determine significance for projects within the County (4.1 B.). It should be analyzed whether or not certain species belong in Table 2 and 3 based on their current status. Covered species and their conservation/protection status should be managed based on their sensitivity; management should be consistent and appropriate for the listed status. Increased protection measures for species not listed as endangered or threatened takes scarce resources away from managing species that are listed, compromising their long-term viability in San Diego County.

4. Footnote #15 on Page 12 states that recreational uses within 4,000 feet of an active golden eagle nest are considered significant. This is in stark contrast to USFWS recommendations for passive recreation. Conservation of foraging habitat and nest sites can be achieved for compliance with HCP documents (MSCP Subarea Plan) while allowing seasonally appropriate recreation within 4,000 foot buffer zones without significant impacts to Golden Eagles. Using a 4,000 foot no disturbance buffer without verifiable science based data to support such a large closure of public lands to passive recreation removes the right of the public to access their public lands for low impact uses (such as hiking, rock climbing, or mountain biking). These uses are fully compatible with the County MSCP Program. Restricting these uses through inappropriate application of the MSCP Implementing Agreement is arbitrary; placing burden on the public to scientifically prove otherwise is unreasonable.

<u>Unnecessary Restrictions</u>

In establishing recreation use restrictions the County of San Diego Biological Resources Guidelines makes reference to the Multiple Species Conservation Plan (MSCP) as its guiding document. To use the MSCP to establish rec-use buffer zones unnecessarily restricts public lands use. The MSCP was specifically intended as a tool to be used in the management of *public and private land development projects*. It was not intended to restrict low-impact recreational uses by the general public.

The MSCP Implementing Agreement by and between United States Fish and Wildlife Service, California Department of Fish and Game, and County of San Diego explicitly states the explanation of the reasons for the MSCP transaction in its MSCP Implementing Agreement's Recitals, specifically 1.3 and 1.5 as follows:

1.3 A goal of the MSCP is to conserve biodiversity in the MSCP Plan Area and to achieve certainty in the land development process for both private sector and public sector land development projects.

1.5 Future growth and land development within the MSCP Plan Area, consisting of both public and private projects, may result in a reduction of Covered Species habitat and/or the taking of Covered Species incidental to the carrying out of otherwise lawful activities.

Low-impact human-powered recreation activities such as hiking, rock climbing, and mountain biking are not *land development projects*. These activities should be managed in a fashion consistent with lead wildlife agency recommendations.

Alternative - Seasonal Restrictions at Golden Eagle Nest Sites

ACSD understands the need to protect golden eagles during critical life stages and recommends seasonal nesting restrictions in the immediate vicinity of nest sites. According to the USFWS, under the Bald and Golden Eagle Protection Act (BGEPA), an eagle nest used within five years should be considered active; active nests should receive seasonal restrictions to ensure reproduction of the species. Seasonal restrictions are successful in that they allow golden eagles to nest during critical times of the year, while allowing public access to much needed and valuable recreation resources during non-nesting season. This type of management strategy has proven effective in allowing golden eagles and passive rec-users to successfully co-exist within the same resources—at different times of the year. USFWS Eagle Management Guidelines published in 2007 due to de-listing of the Bald Eagle recommend a minimum 330 foot buffer zone for passive recreation.

ACSD has successfully worked with our local Cleveland National Forest (CNF) to engage in joint-monitoring of known raptor nests and signing of specific restrictions when necessary. At the start of golden eagle nesting season (mid-December) at known nests that are also used for public recreation ACSD promotes closures to allow eagles to select a nest site. If the site is not selected by mid-March (due to the eagles' selection of an alternate nest site) closure restrictions are lifted by the CNF allowing for public recreation to continue.

In Closing

ACSD is specifically poised to help the County manage public lands used for passive recreation by keeping the community informed of seasonal restrictions and through effectively influencing rec-users to respect seasonal restrictions. As an environmentally responsible membership-based climbers' advocacy organization dedicated to promoting and maintaining access to climbing and outdoor recreation, ACSD has achieved respect amongst climbers and other rec-users as the voice of reason within the San Diego and greater Southern California climbing community. This puts ACSD in a unique position to help public land managers manage recreation resources, especially when the resources are being managed in a fair and reasonable manner.

ACSD's proposed alternative as outlined above meets the need to have a conservation strategy in place that is also in compliance with the County's MSCP. The actions identified preserve natural communities within the County's Core Biological Areas while providing for much needed outdoor recreation.

Thank you for the opportunity to comment—ACSD stands ready to assist the County if action becomes necessary in areas the public recreates that may also have golden eagle or other raptor species nest sites.

Jeff Brown
ACSD – Ex. Dir.
(619) 508-4665
www.alliedclimbers.org
An Access Fund Affiliate
www.accessfund.org

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, Washington, D.C. 20240

MBPM-2
Date: APR 15, 2003

MIGRATORY BIRD PERMIT MEMORANDUM

SUBJECT: Nest Destruction

PURPOSE: The purpose of the memorandum is to clarify the application of the Migratory Bird Treaty Act (MBTA) to migratory bird nest destruction, and to provide guidance for advising the public regarding this issue.

POLICY: The MBTA does not contain any prohibition that applies to the destruction of a migratory bird nest alone (without birds or eggs), provided that no possession occurs during the destruction. To minimize MBTA violations, Service employees should make every effort to inform the public of how to minimize the risk of taking migratory bird species whose nesting behaviors make it difficult to determine occupancy status or continuing nest dependency.

The MBTA specifically protects migratory bird nests from ***possession, sale, purchase, barter, transport, import,*** and ***export,*** and ***take.*** The other prohibitions of the MBTA – ***capture, pursue, hunt,*** and ***kill*** – are inapplicable to nests. The regulatory definition of ***take,*** as defined by 50 CFR 10.12, ***means to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt*** *to pursue* ***hunt, shoot, wound,*** *kill,* ***trap, capture, or collect.*** Only ***collect*** applies to nests.

While it is illegal to collect, possess, and by any means transfer possession of any migratory bird nest, the MBTA does not contain any prohibition that applies to the destruction of a bird nest alone (without birds or eggs), provided that no possession occurs during the destruction. The MBTA does not authorize the Service to issue permits in situations in which the prohibitions of the Act do not apply, such as the destruction of unoccupied nests. (Some unoccupied nests are legally protected by statutes other than the MBTA, including nests of threatened and endangered migratory bird species and bald and golden eagles, within certain parameters.)

However, the public should be made aware that, while destruction of a nest by itself is not prohibited under the MBTA, nest destruction that results in the unpermitted take of migratory birds or their eggs, is illegal and fully prosecutable under the MBTA.

Due to the biological and behavioral characteristics of some migratory bird species, destruction of their nests entails an elevated degree of risk of violating the MBTA. For example, colonial nesting birds are highly vulnerable to disturbance; the destruction of unoccupied nests during or near the nesting season could result in a significant level of take. Another example involves

ground nesting species such as burrowing owls and bank swallows, which nest in cavities in the ground, making it difficult to detect whether or not their nests are occupied by eggs or nestlings or are otherwise still essential to the survival of the juvenile birds. The Service should make every effort to raise public awareness regarding the possible presence of birds and the risk of violating the MBTA, the Endangered Species Act (ESA), and the Bald and Golden Eagle Protection Act (BGEPA), and should inform the public of factors that will help minimize the likelihood that take would occur should nests be destroyed (i.e., when active nesting season normally occurs).

The Service should also take care to discern that persons who request MBTA permits for nest destruction are not targeting nests of endangered or threatened species or bald or golden eagles, so that the public can be made aware of the prohibitions of the ESA and the BGEPA against nest destruction.

In situations where it is necessary (i.e., for public safety) to remove (destroy) a nest that is occupied by eggs or nestlings or is otherwise still essential to the survival of a juvenile bird, and a permit is available pursuant to **50** CFR parts 13 and 21, the Service may issue a permit to take individual birds.

Steve Williams

Director

MEMORANDUM OF UNDERSTANDING

Between

Bureau of Land Management, Palm Springs-South Coast Field Office

And

The Allied Climbers of San Diego

This Memorandum of Understanding (MOU) is made and entered into between the BLM, Palm Springs-South Coast Field Office, herein referred to as PSSC, and The Allied Climbers of San Diego, herein referred to as ACSD.

A. PURPOSE

The purpose of this MOU is to develop and expand a framework of cooperation upon which mutually beneficial programs, projects, training, climbing and other recreation activities may be planned and accomplished on PSSC lands by the PSSC and ACSD working cooperatively at the local level. Such programs, projects and activities complement PSSC recreation management and will further BLM's recreation and stewardship goals.

B. STATEMENT OF MUTUAL INTERESTS AND BENEFITS

PSSC is a public land management organization within the Department of Interior, dedicated to the management of BLM public lands for a variety of multiple uses and activities including outdoor recreation. PSSC is interested in providing a variety of diverse recreational opportunities that are environmentally responsible, educational and that support community objectives in order to contribute to local and regional economies and improve the local quality of life.

ACSD represents local climbers, and the interest of other outdoor recreation enthusiasts, in advocating on behalf of the climbing community, establishing climbing ethics, promoting volunteerism, and helping to establish appropriate land-use management on Federal and non-Federal lands. ACSD is a local, environmentally responsible, non-profit organization dedicated to promoting and maintaining access to climbing and outdoor recreation. As an affiliate of The Access Fund, a national non-profit organization dedicated to keeping climbing areas open and to conserving the climbing environment, ACSD works closely with land management agencies, environmental organizations, climbing groups, outdoor businesses and guide services on conservation projects, land acquisitions and climbing policy. Access Fund and ACSD members desire to use PSSC managed public lands for recreational purposes, and through this MOU or subsequent agreements, the Access

Fund and ACSD may provide support, volunteer labor and/or funds to PSSC for accomplishment of mutually beneficial climbing programs, projects and activities.

There is a need to actively promote public-private partnerships that encourage responsible use of public lands. Both the BLM and the Access Fund share the common interest of providing information to the public on such subjects as conservation, recreation and natural resource activities as they relate to climbing. In consideration of this premise, the BLM and the Access Fund have entered into a Service-wide Memorandum of Understanding, W0250-2005-08, entered into under the authority of Section 307(b) of FLPMA, 43 U.S.C. To further the concepts provided for in the Service–wide MOU, PSSC and ACSD agree to enter into a regional Memorandum of Understanding that will provide specific focus on pursuing opportunities within the PSSC Field Office that are of mutual benefit to both parties.

In consideration of the above, the parties agree as follows:

C. PSSC SHALL:

1. Work with ACSD to identify appropriate partnership opportunities (trail projects, administrative and research studies, education programs, etc.) and jointly pursue such projects together with the recreation and climbing community and PSSC contingent upon availability of funds and personnel and subject to compliance with applicable federal law, regulations, Land Use Plans, or other BLM management directives.

2. Encourage local district personnel to participate with ACSD staff, representatives, members, and volunteers in the development of said mutually beneficial partnership opportunities.

3. Where appropriate, make ACSD interpretation and education information regarding recreational land-use and ethics, climbing, and recreational opportunities on PSSC lands available to the public.

4. Make PSSC lands available for recreation related activities, subject to applicable Federal laws, regulations, Land Use Plans, and other management direction in manner that fosters environmentally sound recreation while protecting sensitive resource values.

5. Work with ACSD to identify and pursue funding opportunities for said partnership opportunities from sources outside of federal appropriations and programs, such as state sponsored grant programs or private grant programs, subject to compliance with applicable federal laws and regulations.

D. ACSD SHALL:

1. Work with PSSC to identify appropriate partnership opportunities (trails projects, administrative and research studies, education programs, etc.) and jointly pursue such projects or activities, when appropriate, and to facilitate improved understanding and communication between technical climbers, recreational climbers, public agencies, and the general recreating public.

2. Develop and maintain a communication network for contacting climbers through a system of local, state, regional, and national Access Fund organizations.

3. Provide technical assistance to PSSC land managers involved in technical and recreational climbing projects, educational activities, opportunities, and management; make ACSD program information available to the BLM.

4. Provide information from the Access Fund's database and library of publications related to climbing activities that can be made available to the public.

5. Provide education, training, and instructions to its members and the recreating public when appropriate, regarding Leave No Trace, stewardship and BLM regulations as they relate to climbing, resource protection, and multiple-use and encourage the incorporation of these programs in all activities.

6. Obtain prior approval from PSSC of all press releases, published advertisements, and publication of any cooperative BLM/ACSD printed materials, or other statements intended for public distribution that refer to this agreement, or to PSSC, BLM, or the name or title of any employee or use the BLM logo in connection with this MOU.

7. Delegate, when appropriate, to an affiliate organization or organizations any task that is better suited to these organizations.

E. IT IS MUTUALLY AGREED AND UNDERSTOOD BY ALL PARTIES THAT:

1. FREEDOM OF INFORMATION ACT (FOIA). Any information furnished to the BLM under this instrument is subject to the Freedom of Information Act (5 U.S.C. 552).

2. PARTICIPATION IN SIMILAR ACTIVITIES. This instrument in no way restricts the BLM or the Cooperator(s) from participating in similar activities with other public or private agencies, organizations, and individuals.

3. NONCOMPETITIVE AWARDS/CONTRACTS/OBLIGATION OF FUNDS. This MOU does not establish authority for noncompetitive award to ACSD of any contract or other agreement. Any contract or agreement for training or other services must comply fully with all applicable requirements for competition. Nothing in this MOU shall obligate either PSSC or ACSD to obligate or transfer any funds. Specific work projects or activities that involve the transfer of funds, services, or property will require execution of separate agreements and be contingent upon the availability of appropriated funds. Such activities must be independently authorized by appropriate statutory authority. This MOU does not provide such an authority. Negotiation, execution, and administration of each such agreement must comply with all applicable statutes and regulations.

4. COMMENCEMENT/EXPIRATION/TERMINATION. This MOU takes effect upon the signature of the PSSC and ACSD and shall remain in effect for five years from the date of execution. This MOU may be extended or amended upon written request of either the PSSC or ACSD and the subsequent written concurrence of the others(s). The PSSC and ACSD may terminate this MOU with a 60-day written notice to the other(s).

5. RESPONSIBILITIES OF PARTIES. The PSSC and ACSD and their respective agencies and office will handle their own activities and utilize their own resources, including the expenditure of their own funds, in pursuing these objectives. Each party will carry out its separate activities in a coordinated and mutually beneficial manner.

6. PRINCIPAL CONTACT. The principal contacts for this instrument are:

PSSC Field Manager
John R. Kalish
Palm Springs-South Coast Field Office
1201 Bird Center Dr
Palm Springs, CA 92262
PHONE 760-833-7100

ACSD Executive Director
Jeff Brown
Allied Climbers of San Diego
4878 Monroe Avenue
San Diego, CA 92115-3245
PHONE 619-508-4665

THE PARTIES HERETO, have executed this instrument as of the last written date below.

John R Kalish 3/3/09

JOHN R. KALISH Date
Field Manager,
Palm Springs-South Coast Field Office
Bureau of Land Management
Department of Interior

Jeff Brown 3/6/09

JEFF BROWN Date
Executive Director,
Allied Climbers of San Diego

BLM_CA_Palm_Springs_South_Coast_RMP

From: Kim Kurcab <waves876@hotmail.com>
Sent: Tuesday, December 20, 2011 8:09 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Santa Margarita River Protection

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov

Dear Mr. Kalish:
Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).
I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.
I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.
Please notify me when the BLM completes a final South Coast RMP for public review.
Thank you.

Sincerely,

Kimberly Kurcab
3851 Sherbourne Dr. Apt. O
Oceanside, CA 92056

BLM_CA_Palm_Springs_South_Coast_RMP

From: Friends of the River <info@friendsoftheriver.org> on behalf of michael wright <mlwhtc1@gmail.com>
Sent: Wednesday, December 21, 2011 12:13 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Wild & Scenic recomendation for the Santa Margarita River

Dec 21, 2011

Mr. John Kalish
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish,

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

.make thus wild and scenic.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.
Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Sincerely,

Mr. michael wright
20666 Gaughen Ct
Soulsbyville, CA 95372-9704

BLM_CA_Palm_Springs_South_Coast_RMP

From: russ kaldenberg <kaldenberg@bresnan.net>
Sent: Wednesday, December 21, 2011 8:32 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Comments Provided on South Coast Plan and EIS
Attachments: Kaldenberg South Coast Plan and EIS Comments.docx

Thanks for the opportunity to comment on the Plan and EIS. Best of luck managing this tremendous resource.

Russell Kaldenberg
kaldenberg@bresnan.net
641 Vista Lane
Cheyenne, Wy 82009
cell 760 382-6316

kaldenberg@bresnan.net
641 Vista Lane
Cheyenne, Wy 82009
20 December 2011

Mr. John R. Kalish
Field Manager
Palm Springs-South Coast Field Office
Greg Hill, Manager, South Coast Management Area
1201 Bird Center Drive
Palm Springs, CA 92262

Dear Mr. Kalish and Mr. Hill:

I am writing to comment on the Draft Resource Management Plan Revision (Plan) and Draft Environmental Impact Statement (EIS) for the South Coast Planning area. I have a long standing interest in the management unit as I was the Bureau of Land Management's (BLM) manager for what was then called the Southern California Metropolitan Project Area (Metro for short) which was a conglomeration of various "management parcels" such as the Potpourri and Otay units which were irregularly (and illogically) managed from the Bakersfield or Redding BLM offices. I believe that an administrative history should be written on the lands within the South Coast Planning Area.

For much of the time I worked in southern California, the planning and management of the California Desert Conservation Area (CDCA) took all available BLM personnel. Few, if any people were assigned to lands outside the CDCA during the early 1970s and 1980s. Lacking staff, the primary goal during those days was to identify lands for public land sales, transfer suitable lands or park-like uses to local jurisdictions under the Recreation and Public Purposes Act, transfer proximal parcels to several Indian reservations as in trust status lands, and to transfer large blocks near the Cleveland National Forest to the United States Forest Service.

Much of that was completed as many lands were obtained by the County of San Diego for park use and by local cities such as Poway. Over 7,000 acres went to local Indian reservations as a result of the Southern California Indian Land Transfer Act of 1988 (PL 100-58), approximately 10,000 acres were sold to private parties through direct sales to adjoining land owners and public auction, and several thousand acres were transferred to the Forest Service. Ceremonies with lots of fizzle accompanied these transfers in the halls of BLM, from Riverside to Sacramento to Washington, DC as it was seen as developing long needed partnerships with cities and counties outside of the CDCA, and solving management issues of no BLM staff to manage the urban interface BLM lands. A legal opinion voided the transfer to the Forest Service after approximately a year of struggling with management issues related to the lands around Otay Mountain. During the early 1990s the South Coast Management Plan was issued with the focus being one of management of lands as an appendage of the Palm Springs-South Coast Resource Area,

now called a Field Office. At that time I was the Resource Area Manager for what was called the Indio Resource Area, which became the Palm Springs-South Coast Resource Area, after much internal debate. One of the major issues during the early to late 1980s was minerals and occupancy trespass. While the above introduction has little to do with the draft documents which the public have been asked to review, I think the record needs to show that the management of the lands has undergone a management metamorphosis in less than a generation. Based upon comments in the revised plan it appears that trespass issues are not a significant issue and appear to have been resolved (3.17.5, pg 3-130). I want to go on record and congratulate you, your office and your staff on this remarkable fete. It is a truly amazing accomplishment.

Since the Plan and EIS appear to be primarily driven by the need to manage rare and or unusual plant assemblages, I will let those with better expertise in botany to deal with the recommendations posed by the two documents. I do care about the management of the biota but more because I am concerned about plant resources which may be of importance to local Native Americans. I will touch on these issues as I comment on some of the issues that I believe need clarification.

One of my major concerns is with cultural resource issues. These are not confined to archaeological issues as many of the lands which I personally visited (nearly every parcel over a three year period) do not have a lot of archaeological sites. Many of the lands are sides of hills and mountains and heavily brush covered, which could mask the sites I suppose. However, many of the parcels are situated in the vicinity of Native American reservations. While, as explained in my introductory paragraphs, proximal lands were transferred to local Indian reservations through the Southern California Land Transfer Act, lands in the vicinity of reservations were not. It was not a consideration.

The landscape in the Plan and EIS could be important to people living on the reservations as they may contain places of significance to tribal people. The Kuchaama (Tecate Peak and Little Tecate Peak) was, I believe, the first landscape to be listed in the National Register of Historic Places (NRHP) because it was what is called a Traditional Cultural Property (TCP). This was based upon no tangible archaeological resources being present on either of the parcels nominated to the NRHP but upon verbal information collected from the Kumeyaay people about the significance of the landscape to them. It was also found to be significant to the native peoples of Mexico as it rises there as a backdrop to Tecate, Baja California. As a result of the South Coast Management planning effort the Area of Critical Environmental Concern (ACEC) for Kuchaama Peak was established. While sensitive plant species exist on the parcels, the establishment of the ACEC was for traditional purposes as a site important to the culture of the native peoples of southern California and Mexico.

Section 3.9.4.4 on “Traditional Native American Values” indicate that the values ascribed by this plan and EIS only to Tecate and Little Tecate Peaks, and to basket making materials. I do not doubt that basket making materials are present, but this is not why the ACEC was recommended or why the NRHP listing was supported.

Have you consulted with Native Americans about the cultural values they may ascribe to this place based upon their culture issues or needs?

Has an access policy been developed which guarantees Native Americans access to the ACEC for their cultural purposes? (As an aside, the last time I tried to access the peak the gate was locked and the only access was by walking a long way; the communication site right-of-way holders could drive to the top of Kuchaama).

The rights-of-way on top of Kuchaama are there for public safety reasons. They detract from the visual qualities of the peak. With cell phone technology continually advancing, is it possible to get rid of the intrusive repeater sites on Tecate Peak and move it elsewhere?

When would you expect this to be undertaken? Will the tribes be involved?

Have you consulted with Native Americans, with federally recognized tribal governments and with the non-federally recognized Native Americans during the development of the EIS and Draft Plan?

If so, I do not see it described in the documents I have reviewed. If so, do they have concerns or issues that need to be addressed?

Undoubtedly the landscapes within the Planning unit, particularly those located in southern San Diego County are close to nearly 20 reservations. Isn't Otay Mountain of significant to some of the local folks? Were they contacted about Otay Mountain?

In Florence Shipek's Autobiography of Delfino Cuero, Shipek mentions Otay as a place where Delfino Cuero gathered. I would suspect there is more information that should be examined regarding the Otay Mountain landscape and perhaps a place of importance to local Native Americans.

The National Park Service (NSPS) has a designation that must be congressionally designated called a National Heritage Area. It is not a NPS unit but is used to link partners together with common management goals. It could be an appropriate tool to consider which would assist the BLM to develop long term partnerships along the California/Mexico border to deal with cultural resource issues, particularly issues related to managing significant landscapes.

Has BLM considered the areas in the vicinity of California State Highway 94, in southern San Diego County as a candidate for National Heritage Area designation?

Would BLM consider examining whether that designation would be appropriate for the area?

The Beauty Mountain area is close to reservations in both northern San Diego County and southern and western Riverside County. It is visible from many of the reservations. Verbal information regarding Beauty Mountain indicates that rock art sites are located there. I was never able to locate them but it

could be that when I attempted to do so much of the lands were privately held and access limited. Also, in parts of western Riverside County the rock art was ephemeral, sand paintings and plant-based rock art (arborglyphs come to mind) have been reported, but they preserve poorly so would not be present to be archaeologically recorded. They would be a non-tangible cultural resource.

Were Native Americans contacted about the significance of the Beauty Mountain area?

If so, what did they say? If not, why were then not consulted?

How were Native Americans involved in the development of either of these documents?

Traditional cultural values do not only apply to Native Americans but they also apply to non-Native peoples and to non-federally recognized Indian tribes and people. Since most of the South Coast area was settled by Spanish and Mexican families as early as 1769 it would might be that there are places of importance to the descendants of Spanish, Mexican, or early American families.

Were non-Native peoples contacted regarding their traditional cultural concerns?

During my tenure in the South Coast area I saw many wild horses in the Beauty Mountain area, particularly along the California Riding and Hiking Trail. I was never certain whether the horse herds belonged to the private property owners or belonged to the federal government. I was contacted several times by people who wanted the herds to be managed as under the Wild Free Roaming Horse and Burro Act (PL 92-195). During the ensuing years I understand that the horses were removed from the area. Over the years I have been contacted by concerned citizens who want the herds to be restored and to be managed under the appropriate laws. If the herd is as it has been described, the remnant of Spanish horses from the days of Spanish and Mexican occupation of the inland area of San Diego and Riverside Counties, then the herd may be a cultural resource and should be considered as such under the National Historic Preservation Act. I see no discussion in the Plan or the EIS regarding wild horses in the area, past, present or future. I make an assumption that the horse herds I witnessed in Beauty Mountain are the former Coyote Canyon herd which may have migrated unimpeded from Coyote Canyon to Beauty Mountain, and should be discussed in the public documents which I just reviewed.

Since this has been an issue which the public has expressed interest with and since I personally saw the horse herds and know they were once on public lands, I think they should be discussed in the planning documents. Was this an oversight?

If so, will this oversight be resolved and how?

Was there ever a herd management plan developed for the Coyote Canyon herd?

If so, did it incorporate the animals in the Beauty Mountain area?

I do not remember seeing one; however, it seems that the El Centro BLM office may have been responsible for the management of the Coyote Canyon herd, and the establishment of a Herd Management Area and subsequent herd management plan. Do you know if this was the case?

I think that will be the total of my comments for your consideration. I would be happy to talk with you about the issues and concerns I have identified, or about anything historic which transpired regarding the management of the South Coast public lands. I can be contacted at 760 382-6316 or at my email kaldenberg@bresnan.net

Thank you for your consideration. I look forward to seeing the answers to the questions I have asked.

Sincerely,

Russell L. Kaldenberg

BLM_CA_Palm_Springs_South_Coast_RMP

From: RJ Boening <rjb@recy-cal.com>
Sent: Wednesday, December 21, 2011 10:52 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: RMP revision

Hello,

I just wanted to thank you for allowing the public input into the revisions of the RMP. As an avid outdoor lover, OHV and street legal motorcycle user and concerned citizen, I urge you to please reconsider closing down to motor vehicle use many of the routes that are proposed to be closed in all three of the new proposed plans. Because of these closures, even in the "Public Use" option, I have no choice but to urge you to stick with the current RMP.

Thank you for your time.

Robert J. Boening Jr.

BLM_CA_Palm_Springs_South_Coast_RMP

From: Jim Conrad <jconrad@simssoftware.com>
Sent: Wednesday, December 21, 2011 11:22 AM
To: BLM_CA_Palm_Springs_FO_Email
Cc: Hill, Gregory C
Subject: Comments on Draft RMP/EIS
Attachments: SCRMP Letter.pdf

Ladies & Gentlemen,

My comments on the Draft RMP/EIS are attached. Note that this is my second submission, since the previously provided e-mail address of capsscrmp.ca.blm.gov was rejected.

Best regards,

Jim Conrad

3723 Brand Crest, Encinitas, CA 92024-5505

858-481-9292 Tel
858-481-3557 Fax

jconrad@simssoftware.com

December 21, 2011

BLM Palm Springs-South Coast Field Office

1201 Bird Center Drive

Palm Springs, CA 92262

Ladies & Gentlemen,

I am writing to provide my public input on the Draft South Coast Regional Management Plan.

My comments relate to BLM's preferred Alternative D, since I am not aware of any case in which BLM was persuaded to change which alternative it preferred based on public input. The common theme of my comments is that BLM has failed to provide adequate public access.

In Vol. 1, Table 2.1, the routes that would be open to vehicular access are summarized. It lists that 329 miles of road are currently open. It is not clear whether this number applies to the 1994 version of the Resource Management Plan, or to the restricted access that was imposed in 2006 when large sections of BLM land (Sycamore Canyon in particular) were unilaterally closed by BLM without public notice, without soliciting public input, and without preparing a revision to the existing Resource Management Plan. In any case, the proposed plan would reduce vehicular access by about half. The reason for this wholesale closure is not adequately explained. Those explanations that are offered have little or no data to demonstrate that a real threat to the habitat will be averted by these closures (e. g., the claimed threat of pollution from exhaust emissions). In some cases, there are actions that could be taken by BLM to mitigate any potential threats (such as fencing archeological sites). I recommend a thorough review of the vehicular access restrictions to include only closures where there is a known, verifiable threat of damage and which could not be mitigated by reasonable action of BLM. I do not believe it is reasonable to close access roads until the next update to the Resource Management Plan (which from previous experience could be 18 years) if the reason for the closure could be mitigated in only a few months.

A related issue is the limited access points into the property. In particular, the two access gates off of Highway 94 and Otay Lakes Road are not included as proposed or even future access points into the BLM lands. I have attended the public scoping session recently held at the Ranch Jamul Ecological Preserve was told that the Highway 94 gate (the "pink" gate) will not be opened due to Caltrans concerns about traffic safety and because of the danger of disturbing an archeological site just beyond the gate. However, there are clear actions which can be taken to mitigate those concerns. It is incumbent on BLM to plan for projects that will mitigate those concerns, rather than to close the gate indefinitely.

The only excuse offered by BLM for excluding the access point via Otay Lakes Road is that one must traverse land owned by the state to gain access to the BLM gate. However, this California property is

managed by the Department of Fish and Game and in their Land Management Plan they include a parking lot which would provide access to the BLM land. When BLM staff was asked to contact DFG to express their willingness to provide access via this gate, if DFG were to install their parking lot, they failed to do so. This simple step would have provided the public with critical access to BLM land, an opportunity which is being foreclosed because BLM does not even mention it in the Draft Resource Management Plan as a future potential point of access.

In the Draft Resource Management Plan, BLM defines a goal to provide adequate motorized access for hunting (Section 2.3.16.1). Yet the vehicular access proposed in the plan prevents access to huge areas in the vicinity of Sycamore Canyon. The only roads providing vehicular access in the Sycamore Canyon run through the Southwest portion of the property. In particular, there is no access to the land in the Northern portion of Sycamore Canyon (generally between the Otay Lakes gate and the Intersection of BLM Roads 055 and 063), nor to the land between Highway 94 and BLM Roads 043/055. One only needs to overlay the roads proposed for vehicular access onto the map of the Sycamore Canyon area to realize that there are huge swaths of land that cannot reasonably be reached by foot by a hunter on a day hunt, such as a quail hunt. This issue could be resolved by either increasing the extent of roads open to vehicular traffic (e.g. BLM Roads 059/061), or by providing at least walk-in access via the two gates discussed in the previous paragraphs.

The Draft Resource Management Plan highlights to desirability of access (easement) acquisitions to enhance public access to BLM lands, yet BLM seems unwilling to provide public access by improving access points they own, or to work with DFG who is receptive to providing an access point into BLM land.

In summary, my primary recommendation is to make constructive changes to the preferred Option D, including:

- Increasing vehicle routes and access points, with the goal of improving public access; and,
- Explicitly identifying potential future BLM physical improvements that will provide increased public access.

These recommendations will benefit not only hunters, but hikers, equestrians and nature observers as well. Additionally, I request that you provide supporting data that the closures recommend in the SCRMP are in fact necessary to protect habitat and wildlife, and not just based on some subjective notion that restricting public access is the best way to protect the habitat.

Sincerely,

Jim Conrad

3723 Brand Crest, Encinitas, CA 92024-5505

jconrad@simssoftware.com

BLM_CA_Palm_Springs_South_Coast_RMP

From: Crystal Howard <crystal@enviromineinc.com>
Sent: Wednesday, December 21, 2011 3:53 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Comments on Draft RMP
Attachments: EnviroMINE Comment Letter on DraftRMP.pdf

Good afternoon,

Please accept the attached comment letter on the Draft Resource Management Plan. If you have any problems viewing the letter please let me know.

Thanks,
Crystal

Crystal D. Howard
EnviroMINE, Inc
3511 Camino Del Rio South, Ste 403
San Diego, Ca 92108
(w) 619-284-8515
(c) 435-760-0802
fax 619-284-0115
crystal@enviromineinc.com.

_____ Information from ESET NOD32 Antivirus, version of virus signature database 6732 (20111221) _____

The message was checked by ESET NOD32 Antivirus.

http://www.eset.com

EnviroMINE, Inc.
Environmental & Mine Permitting Services

December 21, 2011

BLM Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262

RE: Draft South Coast Resource Management Plan (RMP) Revision and Draft Environmental Impact Statement (EIS)

Dear BLM South Coast Field Office:

EnviroMINE, Inc. appreciates the opportunity to submit comments regarding the Draft South Coast Resource Management Plan (RMP) Revision and Draft Environmental Impact Statement (EIS). EnviroMINE is a unique consulting service specializing in services specific to the surface mining industry and our comments address the mineral resource development aspects of the Draft RMP.

We support the goal and objectives of the proposed plan for mineral resources (p. 2-75, Section 2.3.14.1). We believe it is important to balance responsible mineral resource development with the protection of other resource values. In addition, the production of minerals is needed for community and economic purposes to ensure our infrastructure is maintained and our economy continues to grow. It is important for the BLM to encourage and facilitate the development of mineral resources in a manner that satisfies national and local needs and provides for economical and environmentally sound exploration, extraction, and reclamation practices.

To ensure the mineral resource goals and objectives are met, we believe Alternative C is the best option. We support Alternative C because we believe it is important to provide balance among all proposed uses of public lands while being flexible with implementing the regional habitat conservation plans. In addition, we believe this alternative provides the most benefit for use of public lands while also being considerate of environmental needs.

For all proposed alternatives within the Draft RMP, mineral material disposal and or mining claim development should be allowed in areas classified as regionally significant mineral resources by the State Geologist per PRC 2761. It is important to note that the Surface Mining and Reclamation Act of 1975 (SMARA) encourages the conservation of lands containing high quality mineral resources for future extraction. In addition, AB 566 (Galgiani) was passed in 2011 to amend PRC 2711 to clarify that the Legislature further finds that the state's mineral resources are vital, finite, and important natural resources and the responsible protection and development of these mineral resources is vital to a sustainable California. As a result, BLM lands that have been classified as containing high quality mineral resources need to be kept

3511 Camino Del Rio South, Suite 403 - San Diego, CA 92108
(619) 284-8515/(800) 755-3995 - Fax: (619) 284-0115

available for resource extraction. We are also of the opinion that classified lands contained within an Area of Critical Environmental Concern (ACEC) should allow for mineral development.

Many BLM lands are also adjacent to areas classified by the State Geologist as containing regionally significant mineral resources. We encourage the BLM to consider these adjacent lands for potential mineral material disposal and or mining claim development. It should also be noted that mining is a temporary land use and, through mine reclamation, an area can be returned to a use that is consistent with the RMP. Mining and reclamation can also occur in a way that can improve the surrounding habitat. Mining as a temporary use and the benefits associated with reclamation should be taken into consideration when determining if an area will allow or disallow mineral exploration and development.

Thank you for the opportunity to submit these comments. As population continues to grow in this region, so will the demand for construction materials. As a result, it is important to conserve lands containing mineral resources for future development. We encourage the RMP for the BLM Palm Springs-South Coast Field office to allow mineral material disposal on lands containing suitable resources.

Sincerely,
EnviroMINE, Inc

Warren R. Coalson
Principal

BLM_CA_Palm_Springs_South_Coast_RMP

From: Kalish, John R
Sent: Wednesday, December 21, 2011 4:41 PM
To: Hill, Gregory C
Subject: FW: question regarding BLM draft management plan
Attachments: BLM-proposedRMPcomment.121911.pdf

John R. Kalish, Field Manager
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
Office: (760) 833-7100
FAX: (760) 833-7199

From: Harrison, Michael [mailto:Michael.Harrison@mail.house.gov]
Sent: Wednesday, December 21, 2011 2:55 PM
To: Kalish, John R
Subject: RE: question regarding BLM draft management plan

Mr. Kalish, thank you for the consideration, I certainly understand maintaining policy. Please find attached Congressman Hunter's comments that we are requesting be accepted as part of the public comment period, a hard copy has been sent to your office via postal mail. Please let me know if you have any questions, the comments do have a direct tone, but we felt it was necessary to reflect both the stated priorities of this office and the concerns we have received from our recreational constituent groups.

I really appreciate your willingness to meet and if Thursday 1/5 is still available, I would like to arrange for that time at your convenience here at our office if that works. Those expected to be in attendance will include Jeff Brown from Allied Climbers and someone from the San Diego County Wildlife Federation, which more than likely will be submitting comments on the RMP as well if they have not already. My goal is to have a substantive dialogue, not to beat up on the BLM. That being said, I would like to be prepared to discuss with you what specific actions we can take to move forward on some of these action items that we have been discussing for some time. For example, it was three years ago this month when we met in our office with the Federation to discuss the Pink Gate. Unfortunately, not much has occurred since this time. Additionally, when this subject is concluded, I would also like to discuss the case involving Hester's Granite and the land exchange proposition involving the County of San Diego and Jim Salvatore in Ramona. I don't know if you think it would be beneficial to have Jon Cloud and Jim Salvatore attend at the appropriate time, but I can arrange that if you like.

Thank you again for your time. Have a Merry Christmas and I will wait to hear confirmation from you regarding 1/5.

From: Kalish, John R [mailto:jkalish@blm.gov]
Sent: Monday, December 19, 2011 10:59 AM
To: Harrison, Michael
Subject: RE: question regarding BLM draft management plan

We generally do not extend our 90 day comment period, however, I am very willing to meet. I suggest early January as schedules are getting very tight for the end of this month. We can certainly accommodate any clarification or input into the final plan from the recreation interests that you identify. Wednesday and Thursday, Jan. 4th and 5th are open with Thursday being preferred. I can find other days, also.

I appreciate your assistance with this. Please let me know if I can make any contacts prior to a meeting.

John R. Kalish, Field Manager
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
Office: (760) 833-7100
FAX: (760) 833-7199

From: Harrison, Michael [mailto:Michael.Harrison@mail.house.gov]
Sent: Wednesday, December 14, 2011 3:07 PM
To: Kalish, John R
Subject: question regarding BLM draft management plan

Mr. Kalish, our office has been receiving comment and concerns with your draft land management alternatives to the BLM's current South Coast Resource Management Plan. It is my understanding that the deadline for public comment on these alternatives is 12/21 and I wanted to find out if this is indeed a hard deadline or would your office have the authority to extend this a bit in order to receive and possibly enter into a dialogue with some of our constituents. I recognize that the BLM conducted listening sessions in our community, but the feedback I am receiving is that the overall revision remains a bit ambiguous regarding the administration of recreation and, while some of these groups are not outright opposed to amending the current plan, concerns exist with the available alternatives as written. There is a desire to have a meeting with you to discuss these concerns and possibly produce alternatives that are more inclusive of their priorities as recreational groups.

Can you please let me know if the 12/21 deadline is adjustable and, if so, would you be willing to postpone? If 12/21 is not adjustable, would your schedule permit you to attend a meeting with a couple of folks if I can arrange it before that time? I recognize that this is short notice and that we are pushing up against the holidays, but any opportunity would be greatly appreciated and this would be by invite only, not a public forum. If your schedule cannot accommodate before 12/21, I hope that you would be available to still meet at a later point to discuss this topic.

Thanks in advance for your consideration, I look forward to hearing from you.

Michael Harrison
Deputy Chief of Staff, Congressman Duncan Hunter
1870 Cordell Ct, Suite 206
El Cajon, CA 92020
(619) 448-5201

If you would like to receive e-mail updates from Congressman Hunter, please visit his website at www.hunter.house.gov.

BLM_CA_Palm_Springs_South_Coast_RMP

From: Geoffrey Smith <geoffrey@partners4nature.com>
Sent: Thursday, December 22, 2011 8:28 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Support for Santa Margarita W&SR designation

Mr. John Kalish

BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov

Dear Mr. Kalish:

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP, for the reach between Camp Pendleton and I-15. I also urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat.

As a 42-year resident of San Diego, now living in Santa Rosa, CA, I have witnessed first-hand how growth pressures can threaten resources such as the Santa Margarita. Now is the time to put in place the protections necessary to ensure that the 'SMR' will remain vital and free-flowing for another 42 years.

Please notify me when the BLM completes a final South Coast RMP for public review.

Thank you.

Sincerely,

Geoffrey D. Smith, MA
1512 Frederick Street
Santa Rosa, CA 95401
geoffrey@partners4nature.com

BLM_CA_Palm_Springs_South_Coast_RMP

From: squillman692@cox.net
Sent: Thursday, December 22, 2011 9:30 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: SCRMP Revision Comments

Mr. John Kalish
BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov

Dear Mr. Kalish:

I appreciate the opportunity to submit my comments pertaining to the South Coast Resource Management Plan Revision. I have reviewed the specific planning criteria that were outlined in the SCRMP documents as well as the proposed alternatives that were outlined on the website. Upon evaluation of the four alternatives, I whole heartedly support and encourage you to endorse Alternative B. I support Alternative B because it provides the greatest protection and conservation for this critical area of public lands within a massive urban area.

I further request that you designate the Santa Margarita River as suitable for 'Wild & Scenic' status in the NWSRS. I agree with the statement in Appendix G that states "The river possesses outstandingly remarkable scenic, wildlife, and botanic values."

In this large urban area, I feel it is critically important to do our utmost to protect the native plants that support the native insects and animals that ultimately supports and sustains all of the human activities and lives.

Thank you for your consideration.

Regards,

Susan Quillman
4655 Coronado Ave
San Diego, CA 92107

BLM_CA_Palm_Springs_South_Coast_RMP

From: Carla Bowers <cb@waterfallsusa.com>
Sent: Thursday, December 22, 2011 12:42 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP; Hill, Gregory C
Cc: BLM Jan Bedrosian; BLM Tom Pogacnik; Hendron, Jane; Abbey, Robert V; Roberson, Edwin; Guilfoyle, Joan F
Subject: Draft South Coast RMP Revision & EIS Public Comment Due 12/23/11

Mr. Hill - The Draft RMP Revision & EIS is inadequate because it does not address the repatriation of the Coyote Canyon HMA Wild Horse Herd that was wrongfully 'zeroed out' several years ago. Kathleen Hayden has addressed the substantive points in her comments to you, which I fully support. My additional points are as follows:

1) Nowhere in the 1971 Wild Free-Roaming Horses & Burros Act does it give the Secretary of the Interior or the BLM authority to 'zero out' America's protected wild horse & burro herds. They were allocated 53+M acres 'where they were found' in 1971. 20M of those have been unrightfully taken away from the herds' use, including the Coyote Canyon HMA. America's herds are now allocated & restricted to only 27M acres out of 245M acres of BLM lands & out of 650M acres of total Federal lands. Obviously, they deserve their legal lands back for their preservation over the long-term as the 1971 Act intended.

The Draft South Coast RMP & EIS is the perfect opportunity to right the wrongs of the past by including repatriation of the Coyote Canyon HMA Herd back to their legal & rightful range. No matter what land deals or land transfers the BLM negotiated, the protection & preservation of the Coyote Canyon Herd & their legal area should have been part & parcel of the arrangements.

2) For some perspective regarding other wildlife & game species' numbers compared to America's 'protected' wild horses & burros, the U.S. has 20M mule deer, 1M elk, 700K+ pronghorns & 70K bighorns (considered a 'species of concern'). Those wildlife have access to the above-mentioned 650M acres of Federal lands, plus State & private lands. America's 'protected' WH&B should certainly at least have 'preference' on their 'original' legal Western public lands, which represents such a small percentage of all Federal lands as shown in #1 above, & which includes the Coyote Canyon HMA.

BLM has arbitrarily & non-scientifically designated WH&B TOTAL national population numbers to range from a paltry low AML of about 16-18K WH&B to an equally paltry high AML of 26,600 in the whole TEN Western states! The 26,600 total HIGH AML includes only 3K wild burros & 23,600 wild horses. These absurdly low numbers are in the 'endangered species' category as compared to other wildlife. They prove that America's WH&B will not be able to sustain themselves as healthy, genetically diverse herds long-term. The low numbers also prove WH&B are not allocated their fair share of land, forage & water as was intended by the original 1971 Act, thus, the obvious reason to reinstate the Coyote Canyon HMA & repatriate the Herd there.

3) Analyze & establish in the Draft RMP that this herd & all herds, are a Cultural Resource, not just a Natural Resource, as mandated by the 1971 Act: “. . . Congress finds and declares that wild free-roaming horses and burros are living symbols of the historic and pioneer spirit of the West; that they contribute to the diversity of life forms within the Nation and enrich the lives of the American people.” These previous words describe American cultural values & as such, all herds in the West should be given preference because of this important designation, including the Coyote Canyon Herd. This issue must be addressed in the Draft RMP according to NEPA. All herds, as a Cultural Resource, are impacted significantly & negatively by the uncalled-for

roundup/remove/warehouse management strategy of the BLM & most certainly, by wrongfully 'zeroing out' of herds.

4) Analyze in the Draft RMP the significant negative impact that negligently 'zeroing out' the Coyote Canyon Herd has had on the psyche and public trust of the American people. By this past action, BLM has violated its fiduciary duty to truly preserve & protect WH&B for the American people as mandated by the 1971 Act. To blatantly assume that wrongfully 'zeroing out' the Herd several years ago was NOT A SIGNIFICANT IMPACT TO THE HUMAN ENVIRONMENT was and is patently false & a disgrace to the American people who expect America's living legends to be properly protected & preserved by the BLM as the 1971 Act originally intended.

5) When repatriation of the Coyote Canyon Herd is properly addressed & solidified in the Draft RMP & EIS, the following needs to be included:

- A HMAP (Herd Management Area Plan) must be developed for the Coyote Canyon HMA which includes public volunteers, like the Coyote Canyon Caballos D'Anza group, to help with on-the-range management of the herd with emphasis on managing at the 'minimum feasible level' per the 1971 Act.

- A new AML for Coyote Canyon HMA wild horses needs to be determined scientifically based on the herd's genetic diversity & healthy sustainability over the long-term. The AML must support the wild horses' 'welfare' on the range as mandated by the 1971 Act. Then, the 'healthy' AML must be supported by rangeland improvements such as reseeding areas with appropriate types of forage, eliminating invasive & noxious weeds & plants on the range, improving water sources, etc.

- There is already a very successful model management program to follow: the Assateague Wild Horse Program on the East Coast run by the Assateague Island National Seashore. This famous herd has been managed successfully for many years with the use of one-year dartable PZP with a 95% success rate. Only one wild horse removal has taken place since 1995 & that was for the safety of tourists. No roundups/removals/warehousing has occurred at all. Isn't this what BLM should be doing to truly preserve & protect America's WH&B & stop wasting millions of taxpayer dollars?

Please utilize all of these comments in the development of the Draft RMP & to change the course of WH&B management. It's long overdue.

I would like confirmation that you did receive this email & I anticipate receiving your detailed responses.

cc: Pres. Obama, Sens. Feinstein & Boxer

BLM_CA_Palm_Springs_South_Coast_RMP

From: Grant <GStencil@cox.net>
Sent: Thursday, December 22, 2011 1:36 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Public Comment

My family and I are weekly public land users in the San Diego area. I am very concerned with the direction of the BLM in regards to recreation uses
and access. I feel the public land acquired with public tax dollars should be open to all kinds of recreation. I have noticed over the last few years many
BLM areas have been closed to target shooting. I hope that policy will change and BLM will reopen areas to legal target shooting. There needs to be
signs posted that remind people of the rules and to clean up after themselves.

My other concern is lack of access to some areas of BLM lands. What good does it do for BLM to purchase public land and then not let the public access it?
There are areas in San Diego like McAlmond Canyon, Sycamore Canyon, Jamul Mountains, Hauser Mountain that have no access. I also feel the BLM land
should be clearly marked like the forest service does. Many of the markers I do find are old and very difficult to read.

Please focus in the future on allowing the public to access and enjoy our public land with all types of recreation. Thank you very much.
Grant Stencil

BLM_CA_Palm_Springs_South_Coast_RMP

From: Matt Rahn <mrahn@sciences.sdsu.edu>
Sent: Thursday, December 22, 2011 2:28 PM
To: Hill, Gregory C
Subject: SDSU Comments on BLM Draft South Coast RMP and DEIS

Dear Mr. Hill,

The following letter is provided on behalf of San Diego State University in response to the BLM's Draft South Coast RMP and DEIS.

San Diego State University owns and manages the Santa Margarita Ecological Reserve, a roughly 4,500 acre facility that has been dedicated to the collection, understanding and sharing of environmental data for nearly half a century. The work done at the Reserve addresses regionally, nationally and globally important topics such as water quality, endangered species conservation, ecosystem management, wildfires, and climate change. Despite the extensive Land use change that has occurred in southern California, the Reserve has remained relatively pristine. It now represents the last of so many things, including the last free-flowing river, the last inland-to-coastal habitat/wildlife linkage, and a refuge for numerous rare, endemic, sensitive, and endangered species. This unique status is also a major reason why the area is now a hotbed for research and education programs.

Land use planning and conservation programs have identified the Reserve and surrounding lands as essential for the long-term preservation of critically important natural, physical, and cultural resources. We continue to support the designation of the Ecological Reserve as an Area of Critical Environmental Concern under the BLM South Coast Management Plan. The importance of this site cannot be overstated. Through the ACEC designation, the BLM can provide considerable protection for biological resources. I

While it is important to ensure the ecological and environmental integrity of the ACEC, planning efforts must also formally recognize the religious and cultural significance of the property for the Pechanga Band of Luiseño Indians. This is an important, yet often overlooked feature of the area that further exemplifies the unique and irreplaceable nature of the land.

SDSU is working closely with the Pechanga Tribe and City of Temecula in developing cooperative management and conservation programs vital to the protection of the resources and our research and education programs. These current and future efforts between local stakeholders is important in the development of proper management plans, and we encourage the BLM to take this opportunity to help create and implement a cooperative and comprehensive management program for the Santa Margarita area.

In moving forward with the ACEC and other plans and designations, it is important to recognize the importance of our existing and future research and education programs at the Santa Margarita Ecological Reserve. Our mission as an outdoor classroom and laboratory is consequential for the region and our nation. This one-of-a-kind resource and the unique research and education programs cannot be replaced. We therefore encourage the BLM to ensure that the ACEC designation specifically acknowledges these uses, and allows these activities to continue. We encourage the development of a management plan and designations that create a sustainable framework for the continuation of research an education programs, and the protection of our natural, physical, and cultural resources and look forward to working with the BLM in the future.

Thank you for your time and consideration, and please feel free to contact me at any time.

Sincerely,

Matt Rahn Ph.D.
Director, Research and Resource Management Field Stations Program San Diego State University
5500 Campanile Drive
Mail Code 1010
San Diego, CA 92182

Office: 619-594-5386
Cell: 619-846-1916

City of Temecula

41000 Main Street ▪ Temecula, CA 92590 ▪ Mailing Address: P.O. Box 9033 ▪ Temecula, CA 92589-9033
(951) 694-6416 ▪ Fax (951) 694-6499 ▪ www.cityoftemecula.org

Ronald H. Roberts
Mayor

Chuck Washington
Mayor Pro-Tem

Jeff Comerchero
Council Member

Maryann Edwards
Council Member

Michael S. Naggar
Council Member

951-506-5100
FAX 951-694-6499

December 22, 2011

Bureau of Land Management
Palm Springs-South Coast Field Office
PO Box 581260
North Palm Springs, CA 92258

Subject: Comments on Revisions to the Bureau of Land Management South Coast Resource Management Plan

To Whom It May Concern:

The City of Temecula is pleased to have the opportunity to comment on the proposed revisions to the South Coast Resource Management Plan (RMP).

The City's primary concern is to ensure that the updated South Coast Resource Management Plan does not, in any way, diminish the BLM's existing level of environmental interest and concern within the designated Santa Margarita Area of Critical Environmental Concern (ACEC).

1. It is significantly important to the City that the entire mapped area of the Santa Margarita Reserve Area of Critical Environmental Concern (within any of the boundaries provided by Alternatives A, B, C or D) remain unavailable for mineral material sales and closed to mineral material disposal consistent with the original intent for this ACEC area stated in the 1994 RMP, page 105, as follows:

   "To protect this unique area from uses incompatible with its sensitive resources and to ensure its principal use as an outdoor classroom and field biology research site, the Santa Margarita Ecological Reserve ACEC is designated with the following management prescriptions: the ACEC is a right-of-way avoidance area and is unavailable for mineral material sales..."

   It was conveyed by BLM staff at the November 30, 2011 Temecula workshop that all proposed Alternatives (Alternatives A, B, C and D) for the Santa Margarita Reserve ACEC would continue to be unavailable for mineral materials sales and remain a closed area (no sales or disposal of mineral materials). The City is pleased that this continues to be the intent for the Santa Margarita Reserve ACEC and offers several comments to assist in clarifying this specific objective within the updated RMP.

2. Map 2-20, ACEC Designations Alternative C, is missing the legend line item for "ACEC ALT C" which denotes the mapped Santa Margarita Ecological Reserve ACEC. Please add the missing legend line item entitled "ACEC ALT C".

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3. Please ensure that the general description of the "Existing ACEC Designations in the South Coast RMP" for the Santa Margarita Ecological Reserve ACEC, as stated in Appendix H on page 6, is language that will also be incorporated into the finalized update of the RMP. The general description should be further clarified to state that the Santa Margarita Ecological Reserve ACEC is proposed to be closed from mineral entry, as noted in Table 2-17 on Page 2-77.

4. Please clarify that the footnote on Page 4-320 under "Impacts to Mineral Resources – Alternative D (Preferred Plan)" and a similar footnote appearing on Page 4-314 under "Impacts to Mineral Resources – Alternative B (Conservation)" are intended to apply only to the Upper Santa Clara River area. This was confirmed by BLM staff at the workshop in Temecula on November 30, 2011 and, therefore, please add language to these footnotes for clarity as proposed in bold/underline below:

   *The closed areas do not include existing contracts **within the Upper Santa Clara River ACEC** and California Mineral Classifications designated for future sand and gravel resources **within the Upper Santa Clara River ACEC**.

5. Table 2-17 on page 2-79 should be clarified that all Alternatives for the Santa Margarita Ecological Reserve Areas of Critical Environmental Concern would remain unavailable for mineral materials sales and remain a closed area (no sales or disposal of mineral materials). We suggest adding clarifying language in Table 2-17 on page 2-79 that expressly lists each ACEC in each column (for each Alternative) that would be closed to mineral material disposal and unavailable for mineral material sales and, in particular, that the entire Santa Margarita Ecological Reserve ACEC is expressly stated in all Alternatives to be closed for disposal of mineral materials and unavailable for mineral material sales.

6. The last sentence of the third paragraph on page 2-77 that states "*The open and* closed *areas for mineral material disposals would be the same as provided for oil and gas leasing, including exceptions, modification and waivers*" is confusing since it appears to instruct that mineral materials disposals would follow the lead of open and closed areas for Oil and Gas Leasing Management which those areas are unspecified. To clarify, please specifically state which areas would be closed area for mineral materials disposal rather than referring to it being the same as Oil and Gas leasing to avoid confusion, or delete this sentence.

7. The RMP often discusses varying acreage amounts associated with ACECs. It is difficult to ascertain whether the given acreage amount is referring to the entire ACEC area or just part of an ACEC and, if just a part, which part? For example, Table 2-17 on page 2-77 recommends withdrawing the Santa Margarita Ecological Reserve from mineral entry and specifies an amount of acreage it recommends to be withdrawn; however, it is unclear whether this acreage amount is all or just part of the Santa Margarita Ecological Reserve ACEC that is recommended to be withdrawn from mineral entry. Please clarify that it is the entire Santa Margarita ACEC for each Alternative that is recommended to be withdrawn from mineral entry which would be consistent with the 1994 RMP that the entire Santa Margarita ACEC is proposed for closure to mineral leasing and entry.

8. Appendix H, Areas of Critical Environmental Concern, provides a discussion regarding the Santa Margarita Ecological Reserve ACEC Alternatives A, B and D but there is no discussion for Alternative C. Please provide this discussion for Alternative C.

9. Appendix H, Areas of Critical Environmental Concern, under Alternatives B and D, indicates that the Santa Margarita Ecological Reserve Area of Critical Environmental Concern "would be a ROW exclusion area for land use authorizations and major surface disturbing activities." Does this mean that major surface disturbing activities would be supported? Please add clarifying language explaining this statement. Please also note the City requests that the Santa Margarita Ecological Reserve Area of Critical Environmental Concern be expressly closed to any major surface disturbing activities.

10. Appendix H, page 1, provides an introduction to Areas of Critical Environmental Concern and the City requests that language be added to specifically clarify that future lands acquired by the BLM within ACEC designations would be required to comply with the ACEC land use policies and allocations for its ACEC. Language is suggested in bold/underline below:

> "*ACEC's are areas where special management attention is needed to protect, and to prevent irreparable damage to, important historic, cultural, and scenic values; fish; or wildlife resources or other natural systems or processes; or to protect human life and safety from natural hazards. The ACEC designation indicates that the BLM recognizes that an area has significant values, and establishes special management measures to protect those values. In addition, designation also serves as a reminder that significant value(s) or resource(s) exist which must be accommodated when future management actions and land use proposals are considered in or near an ACEC.* **Therefore, any private or public lands within an ACEC designation area that is acquired by the Bureau of Land Management and/or managed or owned in partnership with the Bureau of Land Management would be required to comply with the BLM's land use for its specific Area of Critical Environmental Concern.**"

11. Please add language in the RMP that expressly states any public or private properties that may be acquired by the Bureau of Land Management and/or managed or owned in partnership with the Bureau of Land Management in the future and that are located within the Santa Margarita Ecological Reserve ACEC are expressly closed to mineral material disposal and unavailable for mineral material sales and closed to mineral leasing.

12. The language on the bottom of page 3-110 and the top of 3-111 is incorrect and should be deleted or, at a minimum, revised. It notes: "*Rapid residential and business development in the Temecula area is creating a great demand for aggregate materials in the southern part of the management area, and this demand is expected to continue or even increase. However, most of the aggregates used for this development are being transported long distances from Central or Southern San Diego County or from the Riverside area.*" It is unclear what source this language was taken but it is inaccurate as discussed below.

    a) Temecula's rapid growth occurred over the last two decades and its projected population growth is anticipated to slow down.[1] Likewise, the demand for aggregate is expected to decline rather than continue or increase.

    b) Aggregate used for development in the Temecula area (or the southern part of the management area) is <u>not</u> imported from Central or Southern San Diego (or from the Riverside Area). The opposite occurs in that San Diego largely *imports* its aggregate.[2] The largest Aggregate District in the United States exists from north of Temecula throughout the Temescal area along the Interstate-15 corridor and aggregate resources are abundant in this area. It is incorrect to state that the Temecula area imports its aggregate from Central or Southern San Diego County or the Riverside area when many aggregate quarries are so much closer in proximity.[3]

13. The City urges the BLM to recognize the Luiseño Indians significant cultural and religious values that are located within the Santa Margarita Ecological Reserve Area of Critical Environmental Concern and protect their sacred creation area from incompatible uses including mining. Please ensure that the adopted RMP is expressly closed to mineral material disposal and unavailable for mineral material sales and closed to mineral leasing within the existing or expanded boundaries of the Santa Margarita Ecological Reserve ACEC.

In closing, City of Temecula representatives have attended all BLM public workshops that were held in Temecula regarding this proposal and have been active in ensuring the updated South Coast Resource Management Plan will not diminish the BLM's environmental protections and concerns within the Santa Margarita Ecological Reserve Area of Critical Environmental Concern, part of which is within the City of Temecula boundaries. The City is especially concerned about the incompatibility of mineral resource sales and mineral disposal and appreciates that the BLM will continue its original intent to ensure the biological and cultural values of the lands within the Santa Margarita Ecological Reserve are protected from mining.

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[1] Updated Growth Forecast for the Western Riverside County of Government Subregion (November 2011) compared to the pa population growth of the City of Temecula: http://quickfacts.census.gov/qfd/states/06/0678120.html
[2] Aggregate Availability in California, State Department of Conservation, 2006, page 7
[3] Aggregate Availability in California, State Department of Conservation, 2006, page 16

Should you have any questions or comments on this letter please contact Betsy Lowrey, Planner, at (951) 693-3959 or by email at Betsy.Lowrey@cityoftemecula.org.

Sincerely,

Robert C. Johnson
City Manager

cc: City Council
Patrick Richardson, Director of Planning and Redevelopment
Betsy Lowrey, Planner

Michael J. Connor, Ph.D.
California Director
P.O. Box 2364, Reseda, CA 91337-2364
Tel: (818) 345-0425
Email: mjconnor@westernwatersheds.org
Web site: www.westernwatersheds.org

Working to protect and restore Western Watersheds

By Email

December 22, 2011

South Coast RMP
Bureau of Land Management, Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262

<capsscrmp@blm.gov>
John Kalish <John_Kalish@blm.gov>

RE: Bureau of Land Management's Draft Resource Management Plan Revision and Draft Environmental Impact Statement for the South Coast Planning Area

Dear Field Manager:

Western Watersheds Project is pleased to provide the following comments on the Draft South Coast Planning Area Resource Management Plan and Draft Environmental Impact ("DRMP"). According to the BLM Palm Springs Field Office website comments on the DRMP are due December 23, 2011 so these comments are timely.

Western Watersheds Project works to protect and conserve the public lands, wildlife and natural resources of the American West through education, research, scientific study, public policy initiatives, and litigation. Western Watersheds Project staff and members use and enjoy the nation's public lands, including the lands at issue here, for their wildlife and other natural resources and for health, recreational, scientific, spiritual, educational, aesthetic, and other purposes. Western Watersheds Project has participated in the NEPA analysis for a number of projects in the resource area. Western Watersheds Project's California Director lives within the South Coast Resource Planning Area.

The public lands of the South Coast Planning Area provide significant and critical refugia where rare habitats and associated species persist and important recreational opportunities in one of California's most heavily populated regions. The development of a sound plan that will provide clear guidance over the next few decades is essential to protecting these important resources. We offer the following the comments and recommendations to help achieve that. We have also attached and hereby incorporate our 10/31/10 letter commenting on the Beauty Mountain Allotment lease renewal Environmental Assessment. Please consider those comments as part of this comment letter.

1. Areas of Critical Environmental Concern

The Federal Land Policy Management Act ("FLPMA") mandates that the agency "In the development and revision of land use plans . . . give priority to the designation and protection of areas of critical environmental concern". 43 U.S.C. § 1702 (a). FLPMA defines "areas of critical environmental concern" as "areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards." 43 U.S.C. § 1712 (c).

Because the bulk of the public lands of the South Coast Planning Area provide essential refugia where rare habitats and species persist and provide important recreational resources in one of California's most heavily populated regions, most of the lands in the resource area meet FLPMA's definition of an ACEC and accordingly merit designation as ACEC. Therefore, the BLM should designate all of the proposed ACECs as ACEC in the RMP. The BLM should also designate the proposed Wildlife Habitat Management Areas as ACECs. The term "Wildlife Habitat Management Area" is an almost meaningless classification that does not "protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes" as does an ACEC designation.

2. Livestock Grazing Element

There are currently eight grazing allotments in the resource area encompassing about 37,211 acres. DRMP at 3-101. These allotments comprise the bulk of the larger contiguous blocks of land that managed by the BLM within the planning area. Four of the eight allotments are inactive (Dulzura, Mother Grundy, Rogers Canyon, and Steele Peak). DRMP at 2-67 - 2-68. Under Alternative D (the preferred alternative), six allotments including the four inactive allotments, as well as Beauty Mountain allotment[1] and Otay Mountain allotment would be made unavailable for livestock grazing to resolve substantial resource conflicts. Western Watersheds Project supports the BLM's proposal to make these allotments unavailable for livestock.

However, it is unclear to us why the BLM is proposing to continue authorizing grazing on Clover Flat (205 AUM) and Hauser Mountain (22 AUM) allotments where there are also significant resource conflicts. The BLM should also make those two allotments unavailable for livestock grazing because of resource conflicts as explained below.

a. Clover Flat Allotment:

Clover Flat Allotment consists of about 5,607 acres of public land. Since 1984, grazing activity has become increasingly intermittent and ephemeral due to change in vegetation community types, recent climatic condition changes, extensive drought, and changing fire regimes in the region. Other portions of the allotment have been reduced due to a proposed

[1] Please see the attached letter dated October 31, 2010from Western Watersheds Project identifying many of the resource conflicts caused by livestock grazing on Beauty Mountain Allotment.

Navy withdrawal. The allotment has been grazed only once in the last ten years and habitat conditions are considered excellent in the allotment. DRMP at 3-102.

Alternative D makes this available for 28 cows between 11/01-03/30. Although this is a 5 month period, according to the DRMP at 2-70, this amounts to 205 cow months. However, grazing 28 cows for 5 months amounts to 140 cow months. The DRMP should be clarified to explain the 205 number.

Most of the allotment is Quino checkerspot butterfly habitat and the allotment includes and is adjacent to designated Quino checkerspot butterfly critical habitat. The proposed grazing season coincides with the Quino checkerspot butterfly adult flight and larval growth seasons.[2] Mortality could occur via direct trampling and consumption of eggs, larvae and pupae. Cattle may consume adult and larval nectar and host plants. Harm could occur to larvae, pupae, and adults due to changes in habitat conditions promoting nonnative grasses and loss of host and nectar plants. Livestock trampling and disturbance of cryptogamic crusts could enhance invasion of nonnative species into chaparral. For these same reasons, the 2003 Recovery Plan for Quino checkerspot butterfly recommends "Remove cattle or sheep and phase in weed control where habitat is currently grazed. Although grazing may suppress nonnative plant invasion, it also destroys cryptogamic crusts that naturally slow weed invasion." (USFWS 2003 at 101).

The DRMP should explain why, given the resource conflicts and the lack of use, the preferred alternative is to make this allotment available for grazing.

b. Hauser Mountain Allotment:

Hauser Mountain Allotment consists of about 2,952 acres of public land. Most of the allotment is within the Hauser Mountain Wilderness Study Area. The habitat is chaparral and southern oak woodland. The east parcel of Hauser Mountain Allotment includes Arroyo toad critical habitat (Unit 19e). This area also provides habitat for least Bell's vireo (*Vireo bellii pusillus*). The entire allotment may provide habitat for Quino checkerspot. Alternative D makes the allotment available for 11 cows for a two month period within the 12/16-06/15 season (i.e. 22 AUM). However, any two months within that six month period overlap with important seasonal activities for Arroyo toad, Quino checkerspot, and least Bell's vireo.

The DRMP should explain why, given the conflict with multiple special status species and the presence of livestock sensitive habitats, the preferred alternative is to make this allotment available for grazing.

3. Special Status Species

a. The list of species is incomplete:

[2] Monitoring reports for the last eight years documenting dated sightings of Quino checkerspot butterfly adults and larvae, and documenting host plant condition throughout the species' range are available on the USFWS Carlsbad Field Office website at: http://www.fws.gov/carlsbad/TEspecies/Quino_Monitor.htm

The list of sensitive species is incomplete. For example, the list of sensitive species in the planning area should include the pallid bat, *Antrozous pallidus* (see for example CNDDB occurrence 263). The entire resource area is within the range of the pallid bat in the maps in the Department of Fish and Games California Wildlife Habitat Relationships System map.

b. The DRMP lacks biological goals and basic data for sensitive species:

The FLPMA requires the BLM to prepare and maintain an inventory of all public lands and their resources, and further that, "This inventory shall be kept current so as to reflect changes in conditions and to identify new and emerging resource and other values." 43 U.S.C. § 1711(a). In the DRMP, the BLM have provided lists of special status species (albeit incomplete, see above) but no quantitative evaluation of population status and trends within the resource area. There are no quantitative biological goals, and indeed for most sensitive species there are no specific goals at all. This is a significant flaw in a plan that is ostensibly to provide management guidance for heavily used public lands in one of the most populace regions of California for the next few decades. The DRMP must be revised to include measurable goals for all special status species. Without quantitative goals, there is no way to evaluate the effectiveness of management and the efficacy of the plan. The DRMP does not even provide maps showing the distribution of sensitive species within the planning area. Without this basic inventory information the BLM cannot responsibly consider make land disposal or any ROW allocations.

c. Quino Checkerspot Butterfly:

The endangered Quino checkerspot butterfly, *Euphydryas editha quino*, is active late December through April in the South Coast Resource Management Area. If sufficient rain falls in late summer or early fall (such as occurred in 2010), a rare second generation of reduced numbers may occur (Mattoni *et al*. 1997; USFWS 2003). The section on Quino checkerspot critical habitat is outdated. The DRMP states, "In December of 2008, the USFWS proposed a revision of critical habitat for QCB. This proposal to revise critical habitat focuses on areas known to contain "core" occurrence complexes (i.e., an occurrence complex that contains a large population that remains stable over the long-term while smaller, outlying populations disappear and reappear based on changing local environmental conditions). Core occurrence complexes pro-vide the source of QCB to re-colonize surrounding areas. The Dulzura, Marron Valley occurrence complexes, which contain BLM lands, are considered to be core occurrence complexes under the 2008 proposed revision." DRMP at 3-50. The final rule designating critical habitat for the Quino checkerspot butterfly was published over two years ago on June 17, 2009.

4. Land Tenure Adjustment - Land Disposal

The section of the DRMP dealing with the disposal of public lands is confusing and difficult to follow. There are no specific rationales given for why individual parcels have been selected for disposal and no effort has been made to disclose the resources present on these selected parcels in the planning documents. Because the South Coast Resource Area is so heavily urbanized and developed, the retention of all BLM parcels should be a priority. Retaining these lands provides an important public benefit both by conserving scarce open space

and potentially, given the extraordinary number of at risk species found in the region, habitat with species conservation value.

For example, Alternative D, the preferred action, makes four parcels of land around Castaic Lake in Los Angeles County available for disposal. There is no specific rationale provided for disposing of these parcels of public land yet these lands provide significant public benefit. The parcels are adjacent to Los Padres National Forest and to Castaic State Recreation Area. The largest parcel includes important riparian scrub habitat, and all four parcels are in the immediate Lake Castaic watershed. Disposal of these lands could impact BLM sensitive species such as the Southwestern pond turtle, *Actinemys marmorata pallida*.[3] Disposal of these lands would lead to a loss of consolidated lands in public ownership and would reduce public access between Forest Service and State Lands.

These specific parcels appear to be the following parcels identified in Table A3 (the parcels identified in red on map 2-64 are not labeled with the parcel number and the township and range are not provided in Table A3 making it difficult to identify specific parcels):

011-261	L	R	S	S	83.76 acres
012-311	L	R	S	S	373.65 acres
017-071	L	R	S	S	41.93 acres
017-201	S	S	S	S	40.8 acres

The preferred action should be modified so that all parcels remain in public ownership or to allow parcels to be transferred to other appropriate government agencies if the BLM can no longer manage them.

Western Watersheds Project thanks you for this opportunity to comment on the DRMP. Please keep us informed of all further stages in this planning effort. If you have any questions, please feel to call or e-mail me using the contact information listed below.

Sincerely,

Michael J. Connor, Ph.D.
California Director
Western Watersheds Project
P.O. Box 2364
Reseda, CA 91337-2364
(818) 345-0425
<mjconnor@westernwatersheds.org>

[3] Which I have personally observed in the vicinity of these parcels.

Michael J. Connor, Ph.D.
California Director
P.O. Box 2364, Reseda, CA 91337-2364
Tel: (818) 345-0425
Email: mjconnor@westernwatersheds.org
Web site: www.westernwatersheds.org

Working to protect and restore Western Watersheds

My US Mail and Email

October 31, 2010

John Kalish
Field Manager
Bureau of Land Management
Palm Springs South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262

Kevin Doran <Kevin_Doran@blm.gov>
John Kalish <John_Kalish@blm.gov>

RE: Environmental Assessment
Issuance of 10-Year Grazing Lease for the Beauty Mountain Allotment
DOI-BLM-CA-060-0010-0007-EA

Dear Field Manager:

Western Watersheds Project thanks you for the opportunity to provide comments on the environmental assessment ("EA") for the Beauty Mountain Allotment grazing permit renewal. Please consider these comments in your planning for this project.

Western Watersheds Project works to protect and conserve the public lands, wildlife and natural resources of the American West through education, research, scientific study, public policy initiatives, and litigation. Western Watersheds Project staff and members use and enjoy the nation's public lands, including the lands at issue here, for its wildlife and other natural resources and for health, recreational, scientific, spiritual, educational, aesthetic, and other purposes. Western Watersheds Project members, including myself, have visited the allotment lands and have an active interest in their management.

We offer the following comments based on our preliminary review of this EA:

1. <u>The project merits an EIS</u>: The purpose of an EA is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement ("EIS") or to issue a finding of no significant impact ("FONSI"). 40 C.F.R. § 1508.9. The Beauty Mountain Allotment boundary encompasses 18,754 acres. The allotment includes 9,824 acres of designated wilderness (in the Beauty Mountain Wilderness Area) and about 4,000 acres of Wilderness Study Area. The allotment includes the entire Million Dollar Spring Area of Critical

Environmental Concern ("ACEC"). The allotment includes habitat for the endangered Quino checkerspot butterfly, the endangered Stephens' kangaroo rat, rare plants, and sensitive species. The allotment includes designated critical habitat for the Quino checkerspot butterfly. The allotment includes unevaluated cultural resources. The proposed action may directly, indirectly, and cumulatively impact all of these sensitive resources. Given the scope and scale of the potential impacts, a FONSI cannot be issued for the proposed action and preparation of a full EIS is merited.

2. The EA is incomplete: The EA is missing the required section on Areas of Critical Environmental Concern ("ACEC"). The 5,830-acres Million Dollar Spring ACEC and Outstanding Natural Area ("ONA") was designated in 1994 to protect protects important watershed, riparian and sensitive natural values. The entire ACEC is within the allotment boundaries. The Million Dollar Spring ACEC/ONA is not even named in the EA. The EA fails to give basic information on the ACECs size and purpose, and fails to mention let alone analyze the impacts of livestock grazing on the ACEC. The EA should also consider indirect and cumulative impacts to Johnson Canyon ACEC that is located southeast of the allotment boundary.

3. The EA is incomplete: The EA lacks discussion of the proposed action in the context of climate change despite secretarial orders to address climate change in environmental reviews. The EA includes no data on precipitation and no discussion of regional and localized drought despite the entire dependency of cattle on forage production, recent episodes of severe and prolonged drought, and recent nonuse of the allotment due to drought conditions. The EA did not address the cumulative effects of grazing with drought or climate change, despite the reasonable expectation that these will affect the allotment during the proposed permit term.

4. The EA is incomplete: The allotment includes about 4,000 acres of Wilderness Study Area ("WSA") in addition to the 9,824 acres of designated wilderness in the Beauty Mountain Wilderness. The BLM is obligated to ensure that its actions do not impair the wildness values and qualities of a WSA. Although WSA lands are portrayed on the map, there is no mention of the WSA or its management in the EA. Recent court rulings have set aside decisions based on EAs where BLM failed to address whether the wilderness values as they existed at the time the BLM recommended the area be set aside could be impaired by BLM's decision to allow grazing on an allotment, and the cumulative effects of such decisions and other grazing permitted across a WSA. (cf. *Western Watersheds Project v. Rosenkrantz*, CV 09-365-E-BLW)

5. The EA is incomplete: Sections on watersheds, springs, riparian zones and water quality are either nonexistent or incomplete. The allotment overlies "one of the largest pristine watersheds found BLM public lands within the South Coast area." South Coast RMP at 103. The allotment has a number of perennial springs and includes rare live-oak and southern cottonwood-willow riparian forest. The EA does not inventory the springs or describe their condition, nor does it analyze impacts to them. The section on vegetation mentions rare riparian habitats but includes no analysis of impacts other than the potential spread of invasive species. BLM needs to provide an inventory of all riparian zones on the allotment, document their condition, and analyze the impacts. The EA does include a limited section on water quality. Even though "no ground water testing has been done," the EA concludes that cattle grazing would not cause adverse impacts to

water quality. EA at 23. How does this comply with the BLM-California 208 Water Quality Management Plan?

6. Carrying Capacity: The BLM's grazing regulations require that "The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment." 43 CFR § 4130.3-1. Livestock carrying capacity is "the maximum stocking rate possible without inducing damage to vegetation or related resources." 43 CFR § 4100.0-5. Beauty Mountain Allotment was rated as Category I in the 1994 RMP. The objective for Category I allotments is to improve the current resource condition. SCRMP at 129. The RMP does not state what the allotment's carrying capacity is, or how or when that carrying capacity was determined. However, because of changes in circumstances the carrying capacity may have decreased. The table in the Cultural Resources section on page 11, indicates that only 5,496 acres out of the allotment's 18,754 acres i.e. 29% is grazable. According to the EA at 3, "Since completion of the Otay Grazing EIS and SCRMP, there have been considerable changes in circumstances surrounding the original lease authorizations. Noticeable changes in allotment conditions have occurred since the original lease approvals, including acre adjustments with improved GIS information, weather changes, drought, increased fire frequencies, invasive species, and recent recognized listed and sensitive species over the last decade." BLM must determine the current carrying capacity of the allotment to ensure that sensitive resources are protected and to ensure compliance with regulations.

7. Rangeland Health: According to the EA, a Rangeland Health Assessment ("RHA") has been conducted, and "The allotment meets the Secretary of the Interior's Approved Rangeland Health Standards. EA at 3. Elsewhere, the EA states, "The Rangeland Health Assessments have not been conducted but in 2002 an interdisciplinary team, in their professional judgment, identified the allotment to be within proper functioning condition during a vegetation review. In addition, an extensive biological assessment was completed in 2008 for the fuels management program that traverses the allotment." EA at 19-20. This glaring discrepancy needs to be addressed. Has an RHA been conducted? If so, when was this conducted and when was the determination of rangeland health signed? What standards were used in the assessment - the national fallback standards?

In 1994 this allotment was rated "I". The objective for Category I allotments is to improve the current resource condition. SCRMP at 129. Without a summary of the RHA findings it is impossible for the reader to determine if resource conditions have improved and how that recovery occurred.

Without a contemporary RHA that, the decision-maker cannot possibly assure that any grazing permit issued on this allotment complies with 43 CFR § 4180.

8. Alternatives: The National Environmental Policy Act ("NEPA") requires that the agency devote substantial treatment to each alternative and adequately disclose the details of the proposed action. BLM Grazing Regulations require the disclosure of mandatory terms and conditions that specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, for every grazing permit or lease. 43 C.F.R. § 4130.3-1.

The EA purports to analyze 4 alternatives: (A) the proposed action which authorizes 121 cattle (1,452 AUM) year round; (B) no action i.e. no grazing permit issued; (C) Seasonal Use Modification and AUM Reduction; and, (D) Ephemeral Authorized Use and Seasonal Use Modification. Alternatives C and D would both authorize up to 61 cattle (732 AUM) from November 1 - April 30; however, for Alternative D "BLM would not allow grazing for that portion of the season where Quino larval host plant monitoring demonstrates that grazing is having a considerable effect on host plants availability needed by for QCB." EA at 7.

For all the elements considered in the Environmental Consequences section save one, the EA avers that the action alternatives A, C, and D would have identical impacts. This includes Air Quality, EA at 9; Cultural Resources, EA at 13; Environmental Justice, EA at 15; Health and Safety, EA at 16; Recreation, EA at 17; Social Economic, EA at 19; Soil, EA at 21; Hazardous Waste, EA at 22; Water Quality, Surface and Ground, EA at 23; Vegetation Including Invasive/Non-Native Species, EA at 44-46; and, Wilderness, EA at 48. According to the EA, the only element listed in the EA that would have different impacts for alternatives A, C, and D is "Wildlife Habitats".

For Wildlife Habitats, the EA at 34 describes the direct and indirect impacts as:

> In general, grazing of cattle could adversely affect wildlife in several ways. Cattle may trample small animals, such as juvenile, lizards, or rodents and their burrows. The presence of cattle and herders in an area may also disturb wildlife and deter their use of the area.
>
> Under Alternative A, 121 cattle would be authorized year round or seasonally. Alternative A would present the greatest opportunity to provide conflict with wildlife in that cattle could be present year round if forage were available. The potential for year round utilization of vegetation during dryer months would also increase competition for dwindling forage.
>
> Alternative C would provide for less forage competition with wildlife by seasonally limiting forage utilization to wetter months when forage competition would be of less concern. It also represents a reduction of forage utilization of approximately 59% over utilization of forage that would occur under Alternative A.
>
> Alternative D would offer the greatest opportunity to eliminate forage competition concerns and conflicts with wildlife. Livestock authorization would only occur if sufficient precipitation exists to produce suitable forage. Given the expected drying trends, it is expected that non-use or minimal use would continue to be the norm on this allotment.
>
> The primary effects of cattle grazing on QCB are soil compaction, removal of forage and cover, and direct mortality through trampling or potential grazing on host plants or plants that have eggs. Improperly high stocking rates and long seasons of use can exacerbate these impacts. Alternative A provides the greatest opportunity to adversely affect QCB by authorizing year round grazing, increasing the potential for conflict with QCB. Alternative C would reduce impacts to QCB by reducing season of use and reducing authorized use to 732 AUMs from the 1452 AUMs authorized in Alternative A.
>
> Under all of the Action Alternatives, monitoring the use of perennial plants by cattle will ensure that the grazing season does not last beyond the proper season of use as indicated by cattle switching from ephemeral to perennial forage.

> Since this allotment has been lightly used (not grazed in six years due to fire and prolonged drought), impacts to QCB habitat have been very light. The lack of past monitoring data coupled with the difficulty of predicting levels of use for any one year over the long term on an allotment makes prediction of the precise impacts of the Action Alternatives difficult. The impacts to QBC habitat resulting from future seasonal grazing period that would be authorized under Alternative D should be monitored to determine the effectiveness of the proposed action's terms and conditions in ensuring that there are no significant adverse impacts to QCB habitat.

This section is the first time that the reader learns that under Alternative D "Livestock authorization would only occur if sufficient precipitation exists to produce suitable forage. Given the expected drying trends, it is expected that non-use or minimal use would continue to be the norm on this allotment." If the Field Office believes that under Alternative D non-use or minimal use is expected, why would this alternative have the same effects as Alternatives A and C on all elements except Wildlife Habitats?

Although the EA at 34 admits that cattle compact soil, remove forage and cover, and trample vegetation and wildlife it implies that the 121 cattle authorized under Alternative A will have largely identical impacts to the 61 cattle authorized under Alternative C. But for desert grazing, the selection of the correct stocking rate is the most important range management decision (Holchek et al., 1999).

The comparison of alternatives is the heart of the NEPA process. The NEPA document must be revised to include (a) a complete description of each alternative; (b) an adequate disclosure of the impacts of each alternative. Without this, there can be no comparison of alternatives to inform the decision making process.

9. Soils. Soils are a particular concern for this allotment because it contains fragile soils that underlay one of the largest pristine watersheds found on BLM public lands within the South Coast Area. SCRMP at 103. Despite this, the soils section appears to have been cut and pasted from another project NEPA document. While there is nothing wrong with reusing accurate descriptions, this EA is ostensibly a site specific analysis and the data should reflect that aspiration. The EA provides no soil map showing the distribution of soil types, nor does it provide a map showing cattle use areas or concentration areas. According to the EA the ten soil series mapped within the project area vary in susceptibility to compaction and erosion. The general statement on page 19: "Observed erosion appears to be a typical condition of this area" is as specific as the EA gets.

The ground pressure exerted by a cow is about 23.9 pounds/sq. inch (Lull, 1959 at 10), and trampling by livestock exerts pressures equivalent at least to those of heavy tractors (*Id*. at 26). Having 121 head of cattle grazing in the early spring and late fall (EA at 19) when soils are moist will have a much higher impact on soils than 61 head of cattle grazing November 1 to April 30, particularly since they would tend to concentrate in the same areas. Certainly their impacts around concentration areas such as fences, corrals, and troughs would differ.

The EA simply concludes, "Due to the occasional and minimal nature of seasonal use of this allotment, there is no reason to expect that continued cattle grazing would create any downward trends in soil stability, compaction or erosion." But the proposed action is to authorize 121 cattle

year round: it is not to authorize occasional and minimal seasonal use. The BLM has to analyze the effect of the actions it is proposing to authorize.

The soils section should be revised to include a site-specific analysis of the effects of each alternative.

10. Wilderness. The allotment includes about 4,000 acres of Wilderness Study Area ("WSA") in addition to the 9,824 acres of designated wilderness in the Beauty Mountain Wilderness. WSA are managed under the non-impairment standard. Recent court rulings have set aside decisions based on an Environmental Analysis where BLM failed to address whether the wilderness values as they existed at the time the BLM recommended the area be set aside for wilderness could be impaired by the BLM's decision to allow grazing on an allotment, and the cumulative effects of such decisions and other grazing permitted across a WSA. At a minimum, the NEPA analysis must document any and all range improvements located within the wilderness and WSA, and when they were installed. It cannot simply state as here, "The allotment currently impacts the undeveloped value of wilderness character through the presence of range improvement structures such as fences, corrals, and troughs." EA at 47.

11. Range Management. The NEPA documents must describe current grazing management and provide an inventory of range developments such as fences, corrals and troughs and their current condition. The EA should provide a map showing cattle use areas since only 5,496 acres out of 18,754 acres is grazable. EA at 11.

12. Invasive Species: The EA's review of this topic is confusing and is not site-specific. There is ample evidence that livestock inhibits vegetation recruitment through soil compaction, soil crust fragmentation, the facilitation of non-native species invasions, and accelerated erosion. For an overview see Fleischner, 1994. Livestock spread non-native species and this effect increases in livestock watering sites (Belsky and Gelbard, 2000; Brooks *et al.*, 2006). Drought years increase the relative abundance of invasive species, making drought management more important (Brooks and Berry, 2006). The EA conjectures that cattle control non-native invasive plants by consuming the plants before they can set seed. EA at 45. Although no cattle have grazed the allotment for the last 6 years (EA at 34), "Overall, the current densities of non-native invasive species on the allotment being analyzed in this document are considered moderate. Annual fluctuations in densities are directly influenced by the amounts of late winter, early spring precipitation." EA at 46. Evidently then, cattle grazing is not required to maintain non-native species at current levels and the absence of grazing has not resulted in an increase in invasive species.

The EA argues that in the absence of grazing fuel loads may build up resulting in increased risk of catastrophic fire. EA at 6. The EA provides no information on fire frequencies or fuel loads for the project area, and provides no risk analysis to support the claim that fires are more likely in the absence of cattle.

13. Rare Plants: Several rare and sensitive plant species occur on the allotment. The EA provides no recent survey data, no locality specific data, and no trends for these species. The only threat to rare plants that is analyzed to any extent is invasive species spread. The EA fails

to consider other direct impacts such as cattle browsing and trampling plants, or indirect impacts from localized changes in hydrology due to soil compaction and erosion etc. One of these sensitive plants is the CRPR 1B.1 Orcutt's brodiaea, *Brodiaea orcuttii*. The CNPS database lists grazing as a threat to this species.[1] A second is Mojave tarplant, *Deinandra mohavensis*, which is state-listed as endangered. The CNPS database also lists grazing as a threat to this species.[2]

The CRPR 1B.2 long-spined spineflower, *Chorizanthe polygonoides* var. *longispina*, and the CRPR 1B.2 San Bernardino aster, *Symphyotrichum defoliatum*, should be added to the list of "Priority Plant Species Observed or With the Potential for Occurrence on The Beauty Mountain Allotment" that begins on page 40.

The EA must document and analyze direct, indirect, and cumulative impacts to Unusual Plant Assemblages.

14. Quino Checkerspot Butterfly: About two thirds of the allotment provides potential habitat for the endangered Quino checkerspot butterfly, *Euphydryas editha quino*.[3] The EA states that Quino checkerspot butterfly adults have one flight period per year. This is incorrect; if sufficient rain falls in late summer or early fall (such as occurred in 2010), a rare second generation of reduced numbers may occur (Mattoni *et al.* 1997; USFWS 2003).

Permitting cattle grazing on the Beauty Mountain Allotment under all three action alternatives may affect and is likely to adversely affect Quino checkerspot butterfly (*Euphydryas editha quino*) individuals that may occur. Mortality could occur via direct trampling and consumption of eggs, larvae and pupae. Cattle may consume adult and larval nectar and host plants. Harm could occur to larvae, pupae, and adults due to changes in habitat conditions promoting nonnative grasses and loss of host and nectar plants. Livestock trampling and disturbance of cryptogamic crusts could enhance invasion of nonnative species into chaparral. For these same reasons, the 2003 Recovery Plan for Quino Checkerspot butterfly recommends "Remove cattle or sheep and phase in weed control where habitat is currently grazed. Although grazing may suppress nonnative plant invasion, it also destroys cryptogamic crusts that naturally slow weed invasion." (USFWS 2003 at 101).

Because the main season of use is fall to spring, the 121 cattle authorized under Alternative A would be on the allotment during the same season proposed for the 61 cattle authorized under Alternative C. In essence, Alternative A is grazing at twice the stocking rate of Alternative C; consequently, trampling and disturbance impacts will be considerably higher for Alternative A. Under Alternative D, turnout would only be authorized "if sufficient precipitation exists to produce suitable forage". Although this is not specified, the EA implies this is a rare occurrence. Thus the annual trampling and disturbance impacts will be less under Alternative D than Alternative C. Unfortunately though, Alternative D allows cattle turnout during the wetter years which are more conducive for successful recruitment and more important for Quino checkerspot recovery than are the drier years.

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[1] http://cnps.site.aplus.net/cgi-bin/inv/inventory.cgi/Show?_id=brodiaea_orcuttii
[2] http://cnps.site.aplus.net/cgi-bin/inv/inventory.cgi/Show?_id=deinandra_mohavensis
[3] CNDDB Occurrence 90.

The only alternative analyzed in the EA that would comply with the Recovery Plan, promote recovery of Quino checkersport butterfly and avoid take of the species is Alternative B, no grazing.

15. Quino Checkerspot Butterfly Critical Habitat: The final rule designating critical habitat for the Quino checkerspot butterfly was published June 17, 2009. The allotment includes and is adjacent to critical habitat in Unit 6. The section on critical habitat in the EA is misleading and incorrect. The allotment boundary does include some critical habitat and the next closest critical habitat area to the project location is immediately adjacent not 19 kilometers (11.5 miles) to the east. The BLM must analyze the impacts of each alternative on Quino checkerspot butterfly critical habitat.

16. Stephens Kangaroo Rat: The endangered Stephens kangaroo rat, *Dipodomys stephensi*, may occur on the allotment. The CNDDB database lists an occurrence immediately north of the allotment (Occurrence 212) and suitable habitat with burrows and scat have been identified on the allotment. Despite this, the EA provides no analysis of the direct, indirect, and cumulative impacts of the alternatives on Stephens' kangaroo rat.

17: Other Wildlife: The Field Office needs to provide site-specific information on use of the allotment by special status species and use that data to analyze potential impacts. The EA provides little in the way of site-specific data on most special status species on the allotment including bats and burrowing owls. Although wildlife identified by BLM for management includes game animals the EA includes no analysis of impacts to key species such as deer.

The list of citations for the wildlife section is incorrect and another example of a bad cut-and-paste exercise. Most of the 25 citations relate to desert tortoise which does not occur in the project area. The others are for bighorn sheep, southwestern willow flycatcher or the NEMO Plan.

18: Cultural Resources: Only 4.1% of the allotment area and 6.6% of the cattle use area have been surveyed for cultural resources. The BLM admits that it has not verified in the field if these resources have been impacted by grazing, and past surveys by consultants were not specifically designed to identify impacts from grazing. The BLM should survey each of the potentially eligible sites prior to making its decision. It must also establish a timetable for monitoring and surveying the 93.4% of the cattle use area that has not been surveyed.

19. Monitoring: The BLM should identify where the key areas are on the allotment that it will use for utilization monitoring and for range health evaluations. The BLM should identify a schedule for collecting utilization data.

The EA at 5 states that BLM set objectives for residual dry matter (i.e., the amount of forage left in area after cattle have been removed) "in order to protect watershed resources." The basis for this determination should be explained and clarified. How does this relate to carrying capacity?

The EA must also explain what specific metrics would trigger what specific actions "Should monitoring studies demonstrate significant conflict with management of QCB as indicated by

deterioration of rangeland health conditions or failure to meet any of the fall back guidelines and when it has been determined to be livestock caused". EA at 6.

The NEPA document should include the schedule for monitoring for impacts to wilderness, cultural resource, endangered species, sensitive wildlife, rare plants and UPA, and water quality.

Please add Western Watersheds Project to the list of interested public for this grazing allotment using the contact information listed below, and please keep us informed of all further substantive stages in this NEPA process. If you have any questions, please feel to call me at (818) 345-0425 or e-mail me at <mjconnor@westernwatersheds.org>.

Sincerely,

Michael J. Connor, Ph.D.
California Director
Western Watersheds Project
P.O. Box 2364
Reseda, CA 91337-2364
(818) 345-0425
<mjconnor@westernwatersheds.org>

References

Electronic copies of these references can be supplied on request.

Belsky, A. J. and Gelbard, J. L. 2000. Livestock Grazing and Weed Invasions in the Arid West. Oregon Natural Desert Association, Bend, OR. 31pp.

Brooks, M. L., and Berry. K.H. 2006. Dominance and environmental correlates of alien annual plants in the Mojave Desert, USA. Journal of Arid Environments 67:100-124.

Brooks, M. L., Matchett, J. R. and Berry K. H. 2006. Effects of livestock watering sites on alien and native plants in the Mojave Desert, USA. Journal of Arid Environments 67:125-147.

Fleischner, T. L. 1994. Ecological costs of livestock grazing in western North America. Conservation Biology 8(3): 629-644.

Holechek, J. L., Thomas, M., Molinar, F., and Galt, D. 1999. Stocking Desert Rangelands: What We've Learned. Rangelands. 21(6): 8-12.

Lull, H. W. 1959. Fundamental Principles of Soil Compaction. USDA Forest Service. 33 pp. Available on line at: http://books.google.com/books?id=OSsuAAAAYAAJ&lpg=PA26&ots=WJrjPtknPy&dq=Fundamental%20Principles%20of%20Soil%20Compaction%20Howard%20William%20Lull&pg=PA26#v=onepage&q&f=false

Mattoni, R., Pratt, G. F. Longcore, T. R., Emmel J. F. and George, J. N. 1997. The endangered Quino checkerspot, *Euphydryas editha quino* (Lepidoptera: Nymphalidae). Journal of Research on the Lepidoptera. 34: 99-118.

U.S. Fish and Wildlife Service. 2003. Recovery Plan for the Quino Checkerspot Butterfly (*Euphydryas editha quino*). Portland, Oregon. x + 179 pp.

BLM_CA_Palm_Springs_South_Coast_RMP

From: Kerri L King <klk.quest@pobox.com>
Sent: Thursday, December 22, 2011 9:15 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Protect the Santa Margarita River!

Mr. John Kalish

BLM South Coast Field Office Manager
1201 Bird Center Drive
Palm Springs, CA 92262
capsscrmp@blm.gov

Dear Mr. Kalish:

For over the 20 years I lived in Murrieta and enjoyed the beauty of the Santa Margarita River. It doesn't take rocket science to understand its strategic location for ecological and wildlife support in the Temecula Valley area and vast reaches beyond. Please do all you can to protect this last free flowing river in Southern California.

Thank you for soliciting comments in response to the revised South Coast Resource Management Plan (RMP).

I urge the BLM to recommend the Santa Margarita River for protection as a Wild & Scenic River in the final RMP. The Santa Margarita River is regarded as one of the last free flowing rivers in southern California and it possesses outstandingly remarkable scenic, recreational, wildlife, botanical, ecological, scientific, and historical/cultural values. About 10 miles of this scenic river between Interstate 15 and the eastern boundary of Camp Pendleton flow largely through public lands managed by the BLM, as well as state and local agencies. The BLM should consider Wild & Scenic protection for the entire 10-mile segment, to be jointly managed by the federal, state, and local agencies with jurisdiction along the river.

I urge the BLM to adopt Alternative B, which emphasizes the protection and conservation of natural resources, including wildlife and habitat. Alternative B also proposes protection for more Areas of Critical Environmental Concern (ACEC), including an expanded Santa Margarita River Ecological Reserve ACEC and establishment of the newly proposed Upper Santa Clara River ACEC. In addition, Alternative B proposes to protect all lands with wilderness characteristics and to reasonably limit grazing and off-highway vehicle use to protect wildlife habitat, water quality, and other uses of the public lands.

Please notify me when the BLM completes a final South Coast RMP for public review.

Thank you.

Sincerely,
Kerri King
42399 Rambling Lane
Aguanga, CA 92536

klk.quest@pobox.com

Kerri L. King

BLM_CA_Palm_Springs_South_Coast_RMP

From: Debbie Coffey <honualoha@sbcglobal.net>
Sent: Friday, December 23, 2011 12:34 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Cc: Hill, Gregory C; honualoha@sbcglobal.net
Subject: South Coast RMP comment/Debbie Coffey

December 23, 2011

Mr. Greg Hill
South Coast Field Office
BLM
1201 Bird Center Drive
Palm Springs, CA 92262

RE: Public comment - Draft South Coast RMP

Dear Mr. Hill and Mr. Kalish:

My public comment regarding the Draft South Coast RMP is:

I am requesting Alternative A, the no action alternative. With one exception:

I noticed there is no section of this Resource Management Plan regarding wild horses and burros in the past, the present or in any plans for the future.

It seems that there were many wild horses (that seemed to be Spanish horses) in the Beauty Mountain area, which were removed AFTER the Wild Free Roaming Horse and Burro Act of 1971. It seems this was the former Coyote Canyon herd. Was there ever a herd management plan for the Coyote Canyon herd? If there wasn't, please explain why there was no plan.

It may have been the El Centro office that was responsible for establishing a Herd Management Area for the Coyote Canyon wild horses at that time, but it seems to be an area that is now the responsibility of your field office, so I'm requesting that you consider re-introducing wild horses in this area. I am sure there will be local wild horse advocates who are knowledgeable about the Coyote Canyon herd contacting you regarding this, so I ask that listen to their suggestions, work with them, and include plans for the Coyote Canyon herd in your final RMP.

Thank you for your time and attention to this.

Best regards,

Debbie Coffey
honualoha@sbcglobal.net
(323) 650-5504

BLM_CA_Palm_Springs_South_Coast_RMP

From: robert fusco <rlf494@gmail.com>
Sent: Friday, December 23, 2011 6:18 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: South Coast Area Management Plan

I strongly oppose the referenced plan for our area:

1. The plan was constructed with adequate public knowledge or input.

2. The plan lacks detail regarding the access routes and long term availability of same.

3. The plan fails to take into consideration the availability of cooperative agreements with California DFG to provide additional access.

4. Because of the limitations on access many citizens who are mobility limited will not be able to use their lands.

5. The plan has been poorly constructed and will cause unnecessary hardship on many of us who depend on BLM lands for recreation.

Robert L. Fusco

President, San Diego Chapter , National Wild Turkey Federation

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bob

BLM_CA_Palm_Springs_South_Coast_RMP

From: Matt Merritt <sdmoondogg@yahoo.com>
Sent: Friday, December 23, 2011 8:28 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: South Coast Resource Management Plan Revision

Hello,

I am an avid mountain biker interested in exploring our natural areas on mountain bike. I support protected lands that allow the use of mountain bikes as a way to observe and enjoy nature. I do not support the majority of wilderness lands because mountain biking is not an allowed use.

I support alternative D in your plan as it places the power in the hand of the land manager to make the right decision locally.

I also would ask that a representative of BLM contact members of the Concerned Off-Road Bicyclists Association (http://www.corbamtb.com/) and San Diego Mountain Biking Association (www.sdmba.com) to work with them in providing additional mountain biking opportunities on BLM land in Southern California.

Thank you,

Matt Merritt
1377 Cattail Ct.
San Marcos, CA 92078

BLM_CA_Palm_Springs_South_Coast_RMP

From: Sue Best <suebtou@gmail.com>
Sent: Friday, December 23, 2011 11:33 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Chihuahua Valley

We have lived in Chihuahua Valley for 20 years. Our property boarders BLM. We watched the fire of 2003 come literally to my back door. And we thank God for the fire fighters WITH CATERPILLERS who SAVED OUR HOME !

If the BLM considers the areas surrounding this Valley so important to the eco system WHY on earth would you NOT do EVERYTHING possible to protect it from FIRE !!!

Leave it like it is ! Leave it so it CAN be protected from fire !!!

- Our preferred alternative is Alternative A, no action.
- Please do not expand Special Management Areas.
- Please do not modify/restrict Fire Suppression & Fuel Management techniques.
- Please maintain and regulate existing BLM Management areas.
- Please guarantee public access to existing roads and established trails.
- Work with local public use groups (equestrian, hunting, birding, hiking, biking etc…) toensure that roads & trails remain open.
- Support public use activities and events to motivate cooperation and involvement in trail maintenance.
- Work with local residents near public lands to patrol BLM Management Areas.

Bill and Sue Best.
Chihuahua Valley, Ca.

BLM_CA_Palm_Springs_South_Coast_RMP

From: Mary Ryan <mirgler60@yahoo.com>
Sent: Friday, December 23, 2011 1:01 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: RMP/EIS

To Whom it may concern:

I am a resident of Chihuahua Valley, Warner Springs, California. My husband and I moved to the valley about 8 years ago with our dogs and horses so that we can enjoy the country, wildlife and to be able to ride our horses on the local riding trails. I am concerned about changes that can occur to BLM lands. I strongly request that you vote for your Alternative Plan A, No "Action". There are so few areas left that we can go to and enjoy the outback areas.

Draft RMP/EIS

- Our preferred alternative is Alternative A, no action.
- Please do not expand Special Management Areas.
- Please do not modify/restrict Fire Suppression & Fuel Management techniques.
- Please maintain and regulate existing BLM Management areas.
- Please guarantee public access to existing roads and established trails.
- Work with local public use groups (equestrian, hunting, birding, hiking, biking etc…) to ***ensure*** that roads & trails remain open.
- Support public use activities and events to motivate cooperation and involvement in trail maintenance.
- Work with local residents near public lands to patrol BLM Management Areas.

Mary and Dennis Ryan
Chihuahua Valley Road
Warner Springs, California 92086

Dear Planning Team:

We are submitting these comments on the South Coast Resource Management Plan DEIS (the Plan) on behalf of ourselves, our affiliated clubs, and our members.

The California Off-Road Vehicle Association (CORVA) represents over 2000 off-highway vehicle enthusiasts in the State of California. CORVA's activities include advocacy for access to public lands, trail maintenance programs, safety education and user awareness programs.

CORVA advocates on behalf of its members for multiple use of public lands and coordinates programs with other user groups including hunters, target shooters, houndsmen, rock hounds, mountain bike enthusiasts, horsemen, and snowmobilers. We promote responsible recreation, respect for the environment, and "leave no trace" ethics.

CORVA supports the Bureau of Land Management's National Management Strategy for Motorized Off-Highway Vehicle Use (2001). This Strategy recognizes, as does the policy described in BLM Manual 8340 (May 25, 1982) that "off-road vehicle use is an acceptable use of public land wherever it is compatible with established resource management objectives." As established by the Federal Land Policy and Management Act of 1976 (FLPMA), the BLM is required to manage the public lands on the basis of multiple use and sustained yield, while protecting natural values. CORVA recognizes that implementing this Strategy will help promote balance between the need for OHV recreational opportunity and protection of natural and cultural resources.

We would like to thank you for taking the public comments seriously in the planning process and for holding meetings for the public to meet the staff and ask questions. We have reviewed much of the document and wish to focus my comments to the recreation elements of the draft plan.

Appendix I discusses SRMA'a and ERMA's. The first discussed, the Border Mountains, affects me personally, since I live close by and recreate there. A little history on the area. In the late 1990's, the area came under scrutiny. Some groups wanted the area to be all wilderness with no motorized recreation. Others wanted lots of managed motorized recreation. With local Congressman Brian Bilbray's support, a compromise was reached with a large wilderness area designated and a number of green sticker off-road vehicle trail opened. The preferred alternative calls for the closing of most trails and the changing the designations of Otay Mountain Truck Trail and Minnewawa Truck Trail from green sticker allowed to street legal only. This goes against the spirit, if not the letter of the legislation passed in 1999. This plan should continue to allow green sticker OHV use on the main trails in this area. At the BLM hosted meeting on this plan in Temecula, I asked a BLM staff biologist who in his office is responsible for this area. The response was no one, that person retired a few years ago and has not been replaced. Perhaps the reason for so many trail closures is

insufficient agency staff to manage the area. If this is the case you must state this in the EIS. This is no justification to close trails or reduce their access from green sticker to street legal only. If the BLM is interested in identifying areas to develop for upgrades such as trail heads or suitability of routes, I would be happy to personally volunteer my services.

The Badlands Destination/Regional SRMA should indeed be developed into a managed OHV recreation area. I encourage the BLM to coordinate with Riverside County and California OHV Division of State Parks to open an OHV area/park to support the huge OHV population in that region.

The Beauty Mountain Destination/Regional SRMA is another area that should allow more OHV use that the preferred draft plan suggests. Many routes are closed in this desolate area which should be open. In Appendix I, the draft plan lists a variety of activities which could be pursued there, but OHV recreation is left out. Further, many of the activities identified as viable in this area would require vehicles to access for all but the most robust hikers. The draft plan states that the area is suitable for activities such as Hiking, rock hounding, horseback riding, wildlife viewing, photography, nature study and hunting. Most of these activities require vehicular access. Hunters often use off-road vehicles to retrieve game. More green sticker routes should be left open in this area to support the activities the plan suggests.
There is currently federal legislation to make land in this area federal wilderness sponsored by Congressman Darrel Issa. There is no mention of this in the plan and at the time I am writing these comments his district office could not provide me a map of the proposal. As this bill is being moved through the process, if any proposed wilderness falls on the planning area, I expect that existing routes will be identified and left open (or "cherry stemmed") in the bill.

Throughout the planning area the BLM controls many small, isolated parcels of land. These may be bordered by private, Native American and land controlled by other governmental agencies. Most of the routes that are identified as extremely short are really much longer routes which merely cross these small parcels. These parcels are landlocked and there is no public access, but these are still public lands. Routes on these lands should be available to adjacent land owners or anyone granted permission to access them across private land. Existing access restrictions are adequate and no further restrictions are necessary. It is no public service to close these routes. Most of these closures will result in frustration and unlawful activity, with no real public benefit. The BLM may justify these closures as protecting their neighbors. If the owners of the land surrounding these parcels wish to restrict access, it should be left to them. The BLM gives no reason why so many trails are closed or changed to street legal only in the DEIS. The BLM must identify the reasons why each trail is closed or changed to street legal only in the EIS.
While the plan appears overly restrictive overall, there is a route I have identified as having significant value and should be revisited.
Trail BM00077, the road up to Tecate Peak is recommended to be closed Admin Only under alternative D. Tecate peak is considered a sacred place by Native Americans

and the mountain is regularly used by paragliders. The road up is a wide, smooth graded dirt road. It is a road that is often used, is maintained for vehicles to service the communication equipment on top and should remain open to all vehicles.

Conclusion

This plan identifies aprox 550 routes of travel, closes aprox 400 routes, changes 110 routes to street legal vehicles only and leaves only 40 routes for green sticker vehicles. In a time when more people want to recreate with green sticker vehicles, this plan is a crime. Nowhere is it mentioned that parking areas or trail heads be developed for off-road vehicles. This massive closure effectively steals land from the citizens. The plan recommends an enormous ACEC be developed in west Riverside County, effectively closing vehicular use to a huge area. This would take the land away from the people, when the BLM's job is to manage the land for the people. On section 3-115.4 it is stated for the San Diego/Otay area "As a result of rapid growth, however, the demand for recreation exceeds the available supply of opportunities." This statement is answered in the recommended alternative by closing dozens of routes in the area. How does this make sense? How many of the routes in the entire plan area the BLM wants to close were actually visited by biologists, archaeologists and other land use experts? The BLM must disclose this in the final plan. The recommendation of so many closures without written justification makes us come to the conclusion the this plan is fatally flawed and should be either extensively modified or scrapped and replaced altogether.

All uses of the land have impacts that must be weighed against the benefits. We feel that recreation has significant social benefits and that recreation is a legitimate use of public land and should be given a place as was intended by BLM policy and the Multiple Use Sustained Yield Act. CORVA looks forward to working with the Bureau of Land Management toward this end.

Thank you for considering our comments.

Ed Stovin
CORVA Director

UNITED STATES MARINE CORPS
MARINE CORPS BASE
BOX 555010
CAMP PENDLETON, CALIFORNIA 92055-5010

11300
FACOWR
December 22, 2011

Mr. Greg Hill
Bureau of Land Management – South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262

SUBJECT: COMMENTS ON DRAFT SOUTH COAST RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Hill:

On behalf of Marine Corps Base Camp Pendleton (MCB CamPen), please accept the comments below regarding the Bureau of Land Management (BLM) Draft South Coast Resource Management Plan (Draft Plan) and Environmental Impact Statement (EIS). Camp Pendleton only became aware that BLM was revising and seeking comments upon its South Coast Resource Management Plan in the last few days, so these comments were quickly prepared to meet BLM's deadline for comments—December 23, 2011. In the future, we ask that Camp Pendleton be kept informed of any further efforts to revise/finalize the Draft Plan and EIS, so that all of the pertinent MCB CamPen stakeholders can be brought up to date and provide pertinent comments on BLM's actions proposed in the Draft Plan.

Both the Draft Plan—and the 1994 Resource Management Plan that the Draft Plan proposes to revise—contain recommendations for three segments of the Santa Margarita River (SMR) flowing through BLM lands above MCB CamPen. BLM determined these segments to be eligible for Wild & Scenic River protection in the Draft Plan. We are concerned that this determination may not accurately reflect the current uses and character of the SMR between the Camp Pendleton boundary and the Temecula Gorge—which includes extensive agricultural, municipal and recreational activities. Indeed, the reason for some of the withdrawal of public domain lands under the management of BLM in the vicinity of the SMR was for water supply development purposes—which may be inconsistent with management as part of the National Wild and Scenic River System (NWSRS).

There are many provisions of the National Wild & Scenic Rivers Act (WSRA) that encourage the cooperative study and management of National Wild & Scenic Rivers. The ten mile segment of the Santa Margarita River between Interstate 15 and the eastern boundary of Camp Pendleton flows through public, private and quasi-public lands managed by multiple federal, state, and local agencies including lands in this segment owned by the Fallbrook Public Utilities District and managed by the Fallbrook Lands Conservancy. We recommend that BLM organize a meeting of all agencies involved in managing public lands and resources along the SMR to explore and discuss the implications of managing the SMR as part of the NWSRS, and the increasing need for cooperative management of the river, before completing the Draft Plan/EIS—as revisions to the Draft Plan may be necessary. Additionally, the SMR has been adjudicated by a federal court with

continuing jurisdiction over the SMR and water use therein. The Federal District Court for the Southern District of California has appointed a Water Master, and a Water Master Steering Committee, to make decisions about how water should be managed in the SMR given all of the competing uses and associated water rights. Accordingly, we recommend that BLM formally engage the Water Master and the Steering Committee at the next Steering Committee meeting, scheduled for January 17, 2012. Several Steering Committee members have direct interests in the reach of the SMR proposed for NWSRS designation, and will likely be grateful for the opportunity to better understand the proposal and comment upon it.

Finally, BLM should be aware, and consider in evaluating further revisions to the Draft Plan, that a 2002 federal court order approved the Comprehensive Water Resource Management Agreement (CWRMA) between MCB CamPen and Rancho California Water District (RCWD). The CWRMA, among other things, requires discharges of imported water at the Temecula Gorge with the purpose of replenishing groundwater basins on Camp Pendleton and mimicking the SMR's natural variability of flow from its headwaters through the Base to the SMR Estuary. The CWRMA successfully brought back nearly year round flows in the SMR, and in some cases has re-established base flow that was severely diminished by over-pumping in the Temecula Region. It is not clear that a designation of segments of the SMR under the WSRA would be consistent with the requirements of the CWRMA, and BLM should therefore carefully review the CWRMA with both MCB CamPen and RCWD before finalizing the portions of the Draft Plan/EIS that pertain to WSRA designation in the SMR.

We thank you for considering our comments and recommendations, and we look forward to further communications regarding the Draft Plan. Please contact MCB CamPen's Office of Water Resources at (760) 725-1059 or jeremy.jungreis@usmc.mil if you have any questions or if we may be of any further assistance.

Sincerely,

J.N. JUNGREIS
Director, Office of Water Resources
By direction of the Commanding Officer

San Diego Mountain Biking Association

December 23, 2011

RMP Team Lead
BLM Palm Springs–South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
www.blm.gov/ca/palmsprings

re: Draft Resource Management Plan Revision/Draft Environmental Impact Statement (Draft RMP/Draft EIS)

On behalf of the San Diego Mountain Biking Association (SDMBA) I am providing comments regarding the South Coast Resource Management Plan Revision (SCRMPR).* We appreciate the opportunity to participate in the project review.

First, we support Alternative Number 4, which provides the Bureau of Land Management the greatest flexibility in managing their lands. In general, BLM tends to encourage public access and recreation use as much or more than other Federal Agencies, and we would like to see that distinction carried forward.

Regarding the overall plan, although it mentions mountain biking in places, e.g., Chapter 2, pg. 81, in other places the Plan doesn't include it in listings of passive recreational activates (hiking, horseback riding). Possibly this is because there currently is little mountain biking on BLM lands in San Diego section of the South Coast area. On the other hand, I would hate to lose an opportunity for mountain biking in San Diego County, so I would like to see a great emphasis of the potential of mountain biking in BLM lands in the SCRMPR. Unfortunately, with the increasing development of the urban areas, the opportunities for mountain biking near San Diego are becoming increasingly rare.

My understanding of the SCRMPR is that under Alternative 4, the Border Mountains SRMA will be changed to an ERMA. This appears to be beneficial to us ("Special" to "Extensive"), but maybe I'm placing too much emphasis on just a difference in terminology. In particular, the area south of Hauser Wilderness and east of Potrero

San Diego Mountain Biking Association
PO Box 881491
San Diego, CA 92168-1491

AN AFFILIATE OF IMBA
INTERNATIONAL MOUNTAIN BICYCLING ASSOCIATION

County Park (Hauser/Potrero?) appears to have potential as a site for mountain bike trails.

Part of the reason there may (or may not be) little mountain activity in BLM lands within the South Coast region is that we aren't aware of the possibilities. Therefore, SDMBA plans to establish contact with the South Coast region so that we may be able to work a mutually beneficial relationship within San Diego county. We'll be in touch.

Finally, I would like to argue against adopting Alternative B because of its potential emphasis on placing land in Wilderness Areas or similar classifications. In general SDMBA is uncomfortable with the addition of land to Wilderness Areas. Although we support conservation of open space for its own sake, current regulations ban bicycle use in Wilderness Areas. So, in general, where there is presently mountain bike access, or the potential of future bike access, in a given area we would prefer that the area remain as open space but kept outside the Wilderness system (or similar classifications).

The San Diego Mountain Biking Association (SDMBA) is a nonprofit, volunteer organization representing the interests of off-road cyclists and other non-motorized trail users in San Diego County. SDMBA's goal is to unite mountain bike riders, retailers and manufacturers to speak with a coordinated and responsible voice when interacting with other trail users, land managers and policy makers. SDMBA is an IRS 501 (c) 3 Tax-exempt organization dedicated to protecting and improving mountain bike access in San Diego County.

SDMBA has a proven track record of working with land managers promoting responsible and sustainable trail use. In 2010 SDMBA recorded nearly 2000 volunteer hours through the efforts of 200 unique volunteers. In the past year, we worked with land managers to improve trails at Rancho La Costa Preserve, Elfin Forest Recreational Reserve, Mission Trails Regional Park and Crestridge Ecological Reserve, among others. We have worked with diverse agencies: cities in the area, such as San Diego and Escondido, the County of San Diego, Cuyamaca State Park, and the USFS (especially at Mt. Laguna). We strive to make changes that improve the trail system for all users and provide a net environmental benefit.

San Diego
Mountain Biking
Association
PO Box 881491
San Diego, CA 92168-1491

San Diego Mountain Biking Association

In general, SDMBA considers a “trail” to be anything less than 3’ wide. The International Mountain Bicycling Association defines singletrack as a trail where users must generally travel in single file. The tread of a singletrack trail is typically 18- to 24-inches wide, though it can be as narrow as 6 or as wide as 36 inches. Singletrack trails may be designed to wind around obstacles such as trees, large rocks, and bushes. As compared to roads, singletrack trails blend into the surrounding environment, disturb much less ground, are easier to maintain and when properly designed, can control speeds by providing curves and choke points. The tread of singletrack is almost always a natural surface, in contrast to the decomposed granite, gravel or pavement frequently encountered on roads and pathways. Singletrack is important because most trail enthusiasts prefer narrower trails. Whether they are riding a mountain bike, running or hiking the trail, or exploring on horseback, these users want to experience a close connection to nature. Singletrack provides this experience better than roads and provides separation from the world of the automobile. Trees and shrubs may create a tunnel of green, tall flowers may reach eye level and wildlife may cross the path, immersing visitors in the natural world. The experience just isn't the same on an open, wide road.

Yours truly,

/Russell Boggs/

Russell Boggs, Ph.D., J.D.
Member of SDMBA's Board

San Diego
Mountain Biking
Association
PO Box 881491
San Diego, CA 92168-1491

AN AFFILIATE OF IMBA
INTERNATIONAL MOUNTAIN BICYCLING ASSOCIATION

State of California • The Natural Resources Agency
Edmund G. Brown Jr., *Governor*
DEPARTMENT OF PARKS AND RECREATION • P.O. Box 942896 • Sacramento, CA 94296-0001
Ruth Coleman, *Director*
Off-Highway Motor Vehicle Recreation Division
1725 23rd Street, Suite 200
Sacramento, California 95816
(916) 324-5801

December 23, 2011

Bureau of Land Management
Palm Springs-South Coast Field Office
ATTN: Greg Hill
1201 Bird Center Drive
Palm Springs, CA 92262

RE: South Coast Draft Resource Management Plan Revision and Draft Environmental Impact Statement.

Dear Mr. Hill,

The California Department of Parks and Recreation, Off-Highway Motor Vehicle Recreation Division (OHMVR Division) appreciates the opportunity to comment on the Draft South Coast Resource Management Plan Revision and Draft Environmental Impact Statement (DRMP/DEIS). This project provides guidance for the land use management of approximately 300,000 acres of Bureau of Land Management (BLM) administered public lands within five southern California counties: San Diego, Riverside, San Bernardino, Orange, and Los Angeles.

The OHMVR Division, through the Grants and Cooperative Agreement Program (Grants Program), has provided financial assistance in support of BLM projects associated with sustainable motorized access to public lands to engage in such recreational pursuits as riding, driving, rock hounding, nature viewing, and accessing trail heads.

We are encouraged that Alternative C (Recreation Alternative), identifies the Badlands Destination Special Recreation Management Area (SRMA) which would be designated to complement and support the proposed Riverside County OHV Park. As stated in the DRMP, this area would be managed via collaborative partnerships. However, we are concerned that under the Proposed Alternative D, this OHV recreation opportunity would not exist and would also close public access to existing routes within the South Coast ERMA. In recognizing BLM's multiple-use mission as well as the OHMVR Division's support for well-managed OHV recreation opportunities, the OHMVR Division suggests that potential OHV opportunities be given thoughtful consideration.

While Alternative D tries to provide a balanced approach, the reduction of 356 miles of existing routes to 143 miles is of concern. The South Coast Planning Area has a number of competing interests. Accordingly it is important to provide quality access to the outdoors for this densely populated area of the state. The DRMP states the reason for closing the majority of the existing routes is due to conflicts with surrounding private landowners and lack of legal access. The OHMVR Division urges the BLM to consider exploring other means of resolving these potential conflicts and access issues. There are collaborative solutions besides closure that would support maintaining OHV designated routes in the system.

As a cooperating agency, the OHMVR Division looks forward to being involved in the upcoming Final RMP/EIR revision process. Please add Connie Latham, clatham@parks.ca.gov and Barbara Greenwood bgreenwood@parks.ca.gov to your mailing list as contacts for the OHMVR Division.

Thank you again for the opportunity to provide comments on the DRMP/DEIS for the South Coast Planning Area.

Sincerely,

Daphne Greene
Deputy Director
Off-Highway Motor Vehicle Recreation Division

BLM_CA_Palm_Springs_South_Coast_RMP

From: Brendan Prout <g60racer@aol.com>
Sent: Friday, December 23, 2011 7:23 PM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: San Diego BLM Land

It has come to my attention that you currently plan to effectively close nearly all San Diego BLM land to public access and use.
As a taxpayer I am INCENSED by this proposal. My taxes pay for this land to be available for my use as a member of the public. I expect it to remain open and available.

Brendan Prout
9494 Carroll Canyon Road
San Diego CA 92126

December 22, 2011

John Kalish, Field Mgr.
U.S. Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262

Subj: Proposed Revision to the South Coast Resource Management Plan (RMP)

Dear John:

The purpose of this correspondence is to covey my comments/recommendations for inclusion in the processing of the proposed revision to the South Coast Resource Management Plan (RMP). IMHO – based on what I've witnessed so far - the processing of the subject revision has been ineffectual and more importantly it was unfair to the public.

The public workshops were scheduled at a time when the attention of many of the prospective attendees was '*predictably*' focused on the planning and preparation for the holidays; further, the workshops were conducted in such a manner as to prevent, or at least to minimize participative discussions amongst the attendees and BLM staff, which would have 'educated' more of the attendees thereby enabling them to more effectively develop data driven comments/recommendations for the revision process. Worse yet, the significant informational aspects that did surface during the workshop – as meager as they were – were not moralized, since minutes were not documented. Therefore I think the revision process should be extended to insure the opportunity for 'better participative involvement' by representatives from the local community of outdoor recreationists that rely on access to public lands.

I've resided in San Diego County for approximately 70 years, and have established a well known record of constructive proactive involvement with various local organizations, such as, the San Diego Chapter of Quail Unlimited (www.sdqu.net), the San Diego County Wildlife Federation (www.sdcwf.org), the San Diego County Fish and Wildlife Advisory Commission (http://www.sdcounty.ca.gov/awm/fwac.html), and the Citizens Advisory Committee for the Otay Valley Regional Park (http://www.ovrp.org/index.php), which all have a major interest in our local fauna and flora, as they relate to recreational opportunity for the public. In that course I've become very familiar with the lawful recreational opportunities stemming from our local public lands. I've consistently, and with some success, attempted to exploit these recreational opportunities for the enjoyment of myself and my family.

I have long held the premise that *adequate access should always be routinely provided to insure the public is able to enjoy the recreational opportunities available on public lands – except where countermanded by verifiable scientific or safety based data.*

However, during the last 15 years or so, there has been an alarming and discouraging trend evidenced by various governmental entities that ostensibly are tasked to administer and manage public lands for the overall benefit of the public, wherein – at least IMHO – they instead routinely seek to inappropriately and deliberately deprive the public of recreational access to these lands. All of this has been done with apparent impunity from any appropriate 'accountability' – which has not left a positive impression on the public. I believe there is growing consensus amongst the community of those that recreate on public lands that litigation will be require to insure that their right of recreational access is protected.

Your draft for the proposed RMP Revision, with its various options, perfectly illustrates the aforementioned trend of an assigned governmental administrator deliberately and inappropriately attempting to deprive the public of recreational access – all without a plausible explanation. This is particularly perplexing to those that rely on access to public lands for recreation in light of the expressed mandates and public proclamations emanating from your chain-of-command, from as high as the Secretariat level, indicating that BLM's policy and organizational intent is to increase access for recreational opportunities on public land. All the while you consistently strive to restrict or even eliminate access to public lands at every opportunity, apparently without concern for any personal consequence. This cavalier disregard for personal consequence first came to my attention when at your direction vehicular access from Hwy SR 94 into the Sycamore Canyon area via the 'infamous Pink Gate' was closed without proper public notice or any planning provisions to address ADA considerations, nor were any plausible related explanations subsequently proffered.

As stated in the foregoing, your proposed revision to the RMP would result in the closure of many existing roads. And, this would predictably negate our ability to access many public land areas and thereafter we would no longer be able to enjoy our preferred recreational activities, especially within what is known as the San Diego Border Mountain Area. This certainly seems to conflict with the policy and related goals defined by both Executive Order 13343 and the Federal Lands Hunting, Fishing, and Shooting Sports Roundtable MOU. See the following:

- E.O. 13443 -- Mandates the establishment and implementation of a plan for the facilitation of hunting heritage and wildlife conservation that provides for recreational hunting and wildlife conservation plan; for more information view www.nationaltrappers.com/RecHuntingActionPlan.pdf.

Note: What have you done in compliance with this Order since it was issued in August of 2007, and PLEASE identify & explain the new provisions that will be established by the 'proposed RMP' to comply with *E.O. 13443.*

- The Federal Lands Hunting, Fishing, and Shooting Sports Roundtable MOU **–** between the U.S. DEPARTMENT OF AGRICULTURE (Forest Service - 06-SU-11132424-118 U.S.), DEPARTMENT OF THE INTERIOR (Bureau of Land Management & U.S. Fish and Wildlife Service), AND a great many public organizations that represent hunting, shooting, and fishing interests; for more information view http://www.fs.fed.us/recreation/programs/trails/shooting_mou.pdf.

Note: Explain any *provisions* that will be established by the 'proposed RMP' *to comply with the above MOU. IMHO* a critical comparative analysis of the recreational access that was allowed into the public lands in this area - say seven or eight years ago, as compared to what is proposed under this RMP will indicate a total noncompliance with the letter, spirit, and intent as intended and defined by the aforementioned MOU.

During the RMP workshop at the RJER ON 11/29/11 the attendees were promised by BLM representatives – in your presence - that all of the comments & recommendations they submitted would be 'memorialized' and included for public review in the RMP report. The reason I make mention of it, is because at an earlier workshop for what was the called the

SDBM RMP the same promise was made, but not carried out. This concludes my 'comments.' What follows are my recommendations:

1) The revision process should be extended to insure the opportunity for 'better participative involvement' by representatives from the local community of outdoor recreationists that rely on access to public lands.
2) The 'policy and goals' portion of the RMP should be rewritten to included reference to the premise that public lands are for the long-term use and enjoyment of the pubic, and... "That, where public lands are involved adequate recreational access should be routinely provided to the public **– except where countermanded by verifiable scientific or safety based data**.
3) As a part of Management guidelines for lands "recreational access" should be unambiguously defined as a mandate with a plan for accomplishment. Additionally, all planning decisions for the travel access network, whether for new roads, or old roads, should be predicated on considerations for both recreational uses and preservation of the lands described in the RMP, as determined by verifiable scientific or safety based data. In short, road closure decisions should be explained and supported by verifiable data.

If these recommendations are not to be incorporated in this planning process, I hereby request to be so notified. Further, I request to be included for all future related mailings on this matter. If you should have any questions in re: the letter, spirit, or intent relating to my "input," please don't hesitate to contact me.

Respectfully,

Jack Bransford
966 Paseo Del Paso
Chula Vista, CA 91910
619-421-96

CC: (by email)
Secretary Ken Salazar, U.S. DOI
Director Bob Abby, BLM
Calif. State Dir. Jim Kenna, BLM

Central Coast Motorcycle Association P.O. Box 4942 San Luis Obispo, CA 93406

December 23, 2011

Please reply to:

Bruce Whitcher
President, CCMA
1670 Pin Oak Lane
Templeton, CA 93465

Email: User501968@aol.com

Subject: Comments on the South Coast RMP-EIS

capsscrmp@blm.gov

The Central Coast Motorcycle Association has approximately 100 members on California's Central Coast. We advocate for responsible access to public land for a variety of uses including non-motorized recreation. Hunters, hikers, horseback riders, and nature lovers require vehicular access to BLM lands around the country to enjoy their pastimes. The BLM recognizes that outdoor recreation provides a significant contribution to local economies in this RMP-EIS.[1]

The South Coast RMP-EIS includes route designations as a component of Travel Management. To change these route designations would require a plan amendment. The document indicates that project level decisions will follow later and would be done according to the NEPA process.

This plan includes designation of vehicle class, highway licensed versus Green Sticker registration, as a planning level decision. This is unprecedented and we contend this would be more appropriately done as an implementation level decision. In general, the BLM approach to Travel Management is to regulate motorized access to BLM lands regardless of purpose. This leaves more detailed management decisions such as type of vehicle registration as implementation level decisions.

[1] South Coast RMP-EIS page 2-80

We find this RMP-EIS disappointing in that it designates only an extremely limited mileage of routes for Green Sticker use in spite of the need for green sticker vehicles for hunting access and other purposes. The mileage available for Green Sticker Vehicles ranges from only 28 miles in Alternative B to 14 miles in Alternatives C and D out of a total of 356 miles. Over 200 miles of route would be completely closed to public access. This is an almost complete closure of routes over a very large area. This will impose significant new restrictions on hunters and other users of green sticker registered vehicles. No detailed justification for such extensive closures of individual routes is provided in the document. This makes is impossible for the reader to make informed comments on the routes designated or closed.

We encourage the BLM to leave routes on isolated parcels of BLM lands open for public use unless a specific issue has been identified by local land owners with that particular BLM parcel. Local land owners frequently use routes on adjacent BLM land. These parcels usually have no public access. BLM lands are public lands and should remain open to anyone who has legal access from adjacent private land or legal rights of way.

The RMP-EIS lists several important off road riding areas for possible designation and ERMA's or SRMA's. Whether or not these areas are designated as part of the South Coast ERMA or as specific SRMA's is not the issue. What is important is that they remain accessible for public use by motorized vehicles on a meaningful, useable system of designated routes.

These areas include:

Soboba

Near San Jacinto, this area has long been the site of an invitational dirt bike ride on the Soboba Indian Reservation. Routes on approximately 9800 acres of BLM lands could be included as part of this ride that is a charity event. Access is limited due to the location but it can be obtained by event participants. Allowing public access should be explored as an option. Any discussion of this issue in the RMP-EIS is very limited and is included in a single paragraph.[2] This is inadequate to establish a rationale for closure of the area to public access.

The Badlands Destination Area

This area that is South of Highway 60 and West of Beaumont is located close to population centers. Locating destination OHV areas close to population centers has significant advantages as it helps conserve fuel which is required to travel to more remote areas. It reduces the tendency for illegal riding by providing legal opportunity for this activity. It is easier to manage areas that are close to facilities and law enforcement staff. This area is over 1000 acres. Sites

[2] South Coast RMP-EIS page 2-81

this size with existing route systems are uncommon in the planning area. In addition there have been plans for an OHV facility in the area by Riverside County and the State OHV Division. The possibility of utilizing this area should be included as part of the Plan. To require a Plan amendment to open such a facility will effectively remove it from future consideration. Implementation level planning will be required should this area becomes a destination area for it to meet planning requirements of the County and for OHV Division grant funding. This confers sufficient protection on the Badlands area.

Beauty Mountains

This is an enormous tract of public land, over 34,000 acres, with very little in the way of access routes. Green Sticker legal routes presently exist in this area and have been there for years. The RMP-EIS provides no detailed information as to why use of these individual routes by Green Sticker vehicles should not continue. The route plan for this area was developed years ago and should remain in place, perhaps with implementation level modifications if necessary. To impose further planning level restrictions on routes in the area without providing a detailed justification in the RMP-EIS appears to be arbitrary.

Border Mountains Community Area

This is a vast acreage of BLM lands, over 50,000 acres historically used by the local community. Our organization urges the BLM to work with local communities at the implementation level to carry out route designation that will serve the residents. Details such as type of vehicle registration would be more appropriately done at the implementation level as opposed to the planning level as is proposed in the RMP-EIS.

Lake Elsinore Area

This Route Inventory map shows details of the Reservoir Canyon area, Section 26, as well as several other nearby areas with route networks. This is an area of historical use by local residents that is slated for closure to public access under the RMP-EIS. The potential for public access of these areas is not described in detail in the RMP-EIS, nor is there any detailed justification for closure of individual routes. It is therefore not possible for the reader to make meaningful comments on the closure or designation of these routes. This information should be provided as part of the RMP-EIS.

Conclusion

We hope you will find our comments helpful in the development of the South Coast RMP-EIS. We appreciate the opportunity to provide comments on the Plan and look forward to continued participation in the planning process.

BLM_CA_Palm_Springs_South_Coast_RMP

From: Rob Roy Ramey <robroyrameyii@gmail.com>
Sent: Saturday, December 24, 2011 12:22 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Subject: Comments on the South Coast Draft Resource Management Plan Revision and Draft Environmental Impact Statement

South Coast RMP
BLM Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262 December 23, 2011

Subject: Comments on the South Coast Draft Resource Management Plan Revision and Draft Environmental Impact Statement

As a scientist with 31 years experience with research and management of threatened and endangered wildlife, I find that the supposed 'scientific' basis for the "best management practices" (BMPs) detailed in this Plan's Appendix E, is not supported by empirical or reproducible scientific evidence. Its recommendations are naive and inconsistent with both published experimental research, and the lack of deleterious effects reported for commonly used research and management practices in the wild. I detail some of this contrary evidence below and offer a scientifically defensible alternative approach.

Introduction to the 'state of the science' on human disturbance of raptors:
For decades, land managers have closed public lands in to order to minimize human disturbance to cliff-nesting and tree-nesting raptors. The rationale for closures is based on the assumption that the breeding success of nesting birds and populations will be compromised by the presence of humans. This includes scaling nearby sections of cliff, on the ground nearby, or in view of nesting raptors at a great distance.

The presumed deleterious effects most frequently cited in the raptor/human disturbance literature include: 1) energetic costs, 2) nest abandonment, and 3) and reduced in nest success. However, the empirical evidence for these is lacking. Instead, it is almost entirely based on opinion and a precautionary approach (i.e. Richardson and Miller 1997), rather than on experimental evidence. Consequently, there has been overestimation of the closure distances, as well as duration and timing of closures ranges, across nearly all species. Recommended buffer zones around nests range from 50-1800 meters, with the larger distances being recommended by authors relying upon opinion rather than experimental evidence.

Contributing to this issue is a tendency of many authors to uncritically cite the conclusions of previous authors, even if those previous authors' conclusions were based on nothing more than subjective opinion. This has resulted in a "snowball effect," whereby opinions regarding human disturbance of raptors have been repeated over and over in the literature, giving a false perception of scientific rigor, when in fact, little or none exist. Studies that have measured direct effects on fitness and found no deleterious effect, as well as quantifiable experience with management activities in the field, have largely been ignored. Thus, the current state of the "evolving science" on human disturbance of raptors is actually a situation where, in the absence of evidence to show deleterious effects, what has passed for "science" is almost entirely subjective opinion.

Appendix E perpetuates this opinion-based approach by advocating for subjective opinions of "qualified" biologists and individuals to evaluate impacts and propose mitigation, when what is needed is a rigorous

experimental design to test specific hypotheses regarding human activities and base adaptive management upon these.

The definition of what constitutes disturbance has also changed over time. For example, a frequently cited study on human disturbance in golden eagles (Camenzind 1969) documented "disturbance" as the intentional destruction of nests, eggs, and nestlings. However, the definition of human disturbance of golden eagles, including papers citing Camenzind (1969), has evolved into an erroneous assumption that any human activity which alters the normal behavior of a raptor may contribute to reduced fitness, nest abandonment, and/or reproductive failure. This has created an overly precautionary approach to recommending raptor closure distances, whereby a deleterious effect is always assumed, whether or not it can be demonstrated.

Experimental evidence reveals a greater tolerance of human disturbance than expected:
Three studies on human disturbance of raptors stand out in contrast to the trend described above because they relied on controlled experiments to test the effects of human disturbance on the fitness of raptors (White and Thurow 1985; Holthuijzen et al. 1990; Grubb et al. 2007). All three utilized disturbances that were clearly threatening (e.g. blasting; threatening approach via foot, vehicle, or helicopter; gunshots and noisemakers), as compared with relatively benign activities such as hiking, rock climbing, and horseback riding. Yet, all three reported a remarkable tolerance of human disturbance, a decreased response when habituated, and recommended substantially smaller buffer zones than those listed in Appendix E.

Holthuijzen et al. (1990) measured the effects of nearby blasting on nesting prairie falcons, as compared to undisturbed controls. They reported: *"This study demonstrated that, in general, blasting had no severe adverse effects on the falcon's behavioral repertoire, productivity, and occupancy of nesting territories. Therefore, we suggest that when blasting does not occur prior to aerie selection and ceases prior to fledging, blasting that takes place at least 125 m from occupied prairie falcon aeries need not be restricted, provided that peak noise levels do not exceed 140 dB at the aerie (i.e., the noise level we measured for our experimental blasts). We recommend that no more than 3 blasts occur on any given day or 90 blasts during the nesting season."*

White and Thurow (1985) used an experimental approach to quantify the effects of human disturbance on nesting ferruginous hawks. Their "low level" disturbance involved approaching nests on foot while firing a rifle every 20m, driving up to nests, and continuously operating a 3.5hp gasoline motor or noisemaker within 30-50m of a nest. They reported, *"Unlike previous reports of substantial nest desertion by raptors as a result of human activity, the number of disturbed nests that were deserted in our study was unexpectedly low."* And, *"Our observations suggest that a sufficient buffer zone for brief human disturbance around ferruginous hawk nests is 250 m. Adults will not flush 90% of the time if human activity is confined to distances greater than this."*

Grubb et al. (2007) directly approached golden eagle nests at close range via helicopter, and quantified behavior and nest success. This study was a poignant refutation to an often repeated but erroneous perception (discussed above) that golden eagles are highly susceptible to human disturbance. The authors reported results contrary to expectations:

> *"Multiple exposures to helicopters during our experimentation in 2006 and 2007 had no effect on golden eagle nesting success or productivity rates, within the same year, or on rates of renewed nesting activity the following year, when compared to the corresponding figures for the larger population of non-manipulated sites. During our active testing and passive observations, we found no evidence that helicopters bother golden eagles nor disrupt nesting. In 303 helicopter passes near eagles, we observed no significant, detrimental, or disruptive responses. 96% of 227 experimental passes of Apache helicopters at test distances of 0-800 m from nesting golden eagles resulted in no more response than watching the helicopter pass (30%). "*

"We found no relationship between helicopter sound levels [even though Apache helicopters were twice as loud as the civilian helicopters] and corresponding eagle ambient behaviors or limited responses, which occurred throughout recorded test levels (76.7-108.8 dB, unweighted)."

"Between all the other aircraft and human activities occurring in the Tri-Canyon Area, as well as their long term coexistance with WPG and apparent indifference to current operations, golden eagles in the area appear acclimated to current levels of activity. "

"For the specific question of WPG operating in the Tri-Canyon Area without potentially impacting nesting golden eagles, we found no evidence that special management restrictions are required. (Authors' Note: The results of this research were very much unexpected since helicopters are usually considered more disruptive to bald eagles than any other type of aircraft. Plus, golden eagles are traditionally thought to be more sensitive, and therefore more responsive, to human intrusions than bald eagles. However, we found the golden eagles studied during this project to be just as adaptive, tolerant, and acclimated to human activities as any bald eagles in our rather considerable, collective experience with this species. We hypothesize this may at least be in part due to the proximity of the large, growing, and outdoor-oriented population of the Salt Lake Valley and Wasatch Front."

There are few deleterious effects reported for commonly used but highly invasive raptor research and management practices in the wild:

Nest manipulations (including egg -removals for captive incubation and fostering of captively-reared young into active nests), were the primary means of recovery for peregrine falcons until the use of DDT and chemically similar compounds was restricted. Yet, there have been no reports of nest abandonment, or nesting territory abandonment, despite the highly invasive nature of directly climbing into nests for research and management (my direct experience is detailed below). The banding of raptor nestlings, to document dispersal and recruitment, is another invasive research activity that has been widely used on many species of raptors, but has not been documented to reduce individual survival or negatively affecting populations.

My direct experience with research and management of peregrine falcons and prairie falcons:

From 1980-1983 (and until 1989 on special projects in Yosemite National Park), I was a biologist with the Santa Cruz Predatory Bird Research Group, during which time I was actively involved in observing and climbing into active and seasonally inactive nests, of peregrine falcons and prairie falcons in California, Oregon, and Utah. The purpose of those activities was research and active management to bring about the recovery of peregrine falcons, which were then listed as "endangered" under the U.S. Endangered Species Act. As has been well-documented, the primary cause for the decline of peregrine falcons was the production of excessively thin eggshells due to contamination from DDT (and its metabolites) through the ingestion of contaminated prey and subsequent bioaccumulation.

The activities included removal of eggs from wild nests for captive incubation with documented eggshell thinning or nest failure to increase chances of eggs being successfully hatched and increase the number of peregrine falcons produced in the wild. In addition to the continued presence of nest observers, active nests were frequently climbed into more than once over the course of the breeding season, either to:

1) remove eggs for captive incubation and to encourage a second clutch to be laid, which would be recovered for captive incubation at a later date,

2) remove eggs and replace them with ceramic fakes to hold breeding pairs at a site until captive-reared nestlings were available to foster into the nest, in which case a second nest visit was made, or

3) remove eggs and foster captive-reared peregrine chicks directly into the nest.

Additionally, I routinely climbed into active prairie falcon nests for the purpose of cross-fostering of peregrine falcon nestlings where they had a higher rate of survival than at hack sites (because they were raised and defended from predators by the resident prairie falcons).

Following fledging, but frequently while breeding pairs and fledglings were still in the area, I also engaged in the collection of eggshells and prey remains for research, as well as for nest site enhancement (i.e. moving rocks and adding a pea gravel substrate to reduce egg breakage and loss of nestlings).

All of the activities above would typically result in defensive behavior by breeding adults, yet, there was never a documented case of nest abandonment or nest failure by peregrine or prairie falcons as a result of these highly invasive activities. Similarly, peregrine falcons showed no evidence of abandonment due to the presence of multiple climbers on the cliff and/or ground support teams, and the nearby use of helicopters, vehicles, or snowmobiles used for transporting eggs, nestlings, and climbing and support teams. When nests were directly approached by helicopter, the incubating adult would flush from the nest but return once the perceived threat had passed.

Direct experience of this author with research and management of California condors:

In 1983 and 1984, I was a field biologist with the Condor Research Center. My duties included location and observation of active nests, climbing into inactive nests for research (Snyder et al. 1986; Ramey 1986), and climbing into active nests for the purpose of retrieving eggs (and in one case, a nestling) for captive incubation and rearing. Before I began working with the program, observers had to wear camo-clothing and observe from obscured blinds at great distances (i.e. >1.5km) with spotting scopes because of an erroneous perception that nesting condors were sensitive to disturbance by humans in close proximity (H. and N. Snyder, pers. comm.). However, it was later found that nesting condors were very tolerant and we therefore regularly observed active condor nests from observation posts in view of nesting condors, sometimes just a 150 meters away. Also, beginning in 1983, we climbed into active nests to retrieve eggs for captive incubation. This was done up to three times in a breeding season to induce the birds to lay multiple eggs (up to three in one season). Despite this and the use of helicopters to bring eggs from nests to the San Diego Zoo, we did not have any cases of nesting territory abandonment. Condors would typically move to a new nest site after an egg was taken, and return to nest at the site where the egg was taken in the following year or in subsequent years.

Conclusions:

The research and experience documented above is contrary to the perceived need for large scale of closures around raptor nests, as proposed in Appendix E. Instead, much smaller buffer zones in the immediate vicinity of active nests could be justified in most cases (e.g. <150m). While inadvertent climbing into active raptor nests by inexperienced individuals is not a good idea (because there is a risk that eggs could be broken, nestlings injured or prematurely fledge), there is no empirical support for the large-scale closures proposed in Appendix E. Instead, the recommended closures appear to be advocated by inexperienced individuals who are of the *opinion* that the mere presence of humans in the vicinity of an active nest, even if engaged in benign activities, justifies the scale of the closures. That approach does not constitute a scientific basis for the adoption of BMPs in Appendix E. I strongly urge you to strike Appendix E and start over.

I have no confidence in the vague approach to adaptive management in Appendix E:

“As data are gathered, and impact analyses are more accurately documented, "adaptive management" principles should be implemented. Authorization of future activities should take new information into account, better protecting raptors, while potentially allowing more development and fewer restrictions, if data indicates that current restrictions are beyond those necessary to protect nesting raptors, or conversely indicates that current guidance is inadequate for protection of nesting raptors.”

It has been my experience that once raptor closures are in place, closures are rarely ever scaled back, even when contrary evidence is presented. It is better to make sure that closures are needed in the first place. As noted by Gill et al. (2001), *“From a conservation perspective, human disturbance of wildlife is important only if it affects survival or fecundity and hence causes a population to decline. It is therefore vital for conservationists to know whether avoidance of disturbance does in fact result in population change.”*

Therefore, I propose an alternative and more scientifically defensible approach to adaptive management of human disturbance to raptors than proposed in Appendix E. In a recently published peer-reviewed paper on similar issues in sage grouse, we (Ramey et al. 2011) laid out a clear-cut hypothesis testing approach to adaptively manage and mitigate threats from oil and gas development:

> *"For each of these threats we (1) identify the specific sources of each threat, (2) the likely cause-and-effect mechanisms that could lead to a behavioral and/or demographic impact, and (3) recommend specific mitigation measures that could be implemented to minimize these effects in an adaptive management*
> *framework (table 1). Next, we treat the specific sources of threats (number 1 above) as working hypotheses in terms of their congruence (or lack thereof) with existing data or, where there are currently little or no data, their plausible effect on sage grouse populations. We then propose experimental approaches that could be used to test the efficacy of potential mitigation (as suggested by D. Naugle et al.) and discuss the potential value of this and current mitigation measures.*
>
> *The significance of this strategy to sage grouse conservation is threefold. First, it allows for a more efficient allocation of conservation effort by focusing on threats that matter most to the conservation of local populations affected by oil and gas development. Second, it allows for the design of mitigation that is tailored to the circumstances, rather than relying on one-size-fits-all buffer zones or timing restrictions. And third, the effectiveness of mitigation measures can be evaluated using a hypothesis-testing approach, which is at the philosophical core of science-based adaptive management.[15]”*

If the BLM desires to base its best management practices for raptors on science, this is the path ahead.

Feel free to contact me if you have any questions or require additional information.

Sincerely,

Rob Roy Ramey II, Ph.D.
Wildlife Science International, Inc.
Nederland, CO 80466-0386
United States of America
+1 303 718 6686
robroyrameyii@gmail.com

Literature Cited:

Gill, J.A., K. Norris, and W.J. Sutherland (2001) Why behavioural responses may not reflect the population consequences of human disturbance. *Biological Conservation* 97:265-68

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BLM_CA_Palm_Springs_South_Coast_RMP

From: Ryan Henson <rhenson@calwild.org>
Sent: Saturday, December 24, 2011 3:23 AM
To: BLM_CA_Palm_Springs_South_Coast_RMP
Cc: Hill, Gregory C
Subject: CWC comments on SCPA DRMP/DEIS
Attachments: CWC comments on the SCPA DRMP.pdf; AWCs adjacent to Caliente IRA.pdf

Importance: High

Greg,

I'm sorry that these comments are 3 hours and 22 minutes late. I hope that you'll still accept them. I'll need to send the comments to you in pieces because of the file sizes.

Thanks. Happy holidays.

Ryan

****
Ryan Henson
Senior Conservation Director
California Wilderness Coalition
3313 Nathan Drive
Anderson, CA 96007
(O) 530-365-2737
(M) 530-902-1648
(F) 574-966-2324
E-mail: rhenson@calwild.org
Website: www.calwild.org

The California Wilderness Coalition: The Voice for Wild California
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CALIFORNIA WILDERNESS COALITION
The Voice for Wild California

CENTRAL OFFICE
P.O. Box 11094
Oakland, CA 94611
Phone: (510)451-1450
Fax: (510) 451-1445
Email: info@calwild.org
Web site: www.calwild.org

DESERT
FIELD OFFICE
167 North Third Ave. Suite #M
Upland, CA 91786
Phone: (909) 946-1855
Fax: (909) 946-2700

NORTH VALLEY
FIELD OFFICE
3313 Nathan Drive
Anderson, CA 96007
Phone: (530) 365-2737
Fax: (574) 966-2324

December 23, 2011

John R. Kalish
Field Manager
BLM Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262

Subject: The California Wilderness Coalition's (CWC) comments on the Bureau of Land Management's (BLM) Draft Resource Management Plan (DRMP) Revision and Draft Environmental Impact Statement (DEIS) for the South Coast Planning Area (SCPA)

Dear Mr. Kalish:

You and your staff have been working hard, without adequate resources, to protect, restore, acquire and simply manage on a day-to-day basis the over 300,000 acres in the South Coast Planning Area. This is in addition to the vast BLM holdings overseen by your office in the CDCA. Despite the enormity of the challenge, you are doing an excellent job.

We were therefore not surprised to find that the Preferred Alternative in the DRMP contains many positive aspects. Below, we offer several suggestions on how the Preferred Alternative can be further improved to help you properly manage wild lands in the SCPA.

The importance of wilderness, WSAs and other roadless areas

The RMP/EIS does not describe and discuss the many important social and ecological benefits that roadless areas provide. The US Forest Service's (USFS) *Roadless Area Conservation Final Environmental Impact Statement* offers an excellent summary of these values:

- Clean water for domestic, agricultural, and industrial uses, that helps to maintain abundant and healthy fish and wildlife populations, and that provides the basis for many forms of outdoor recreation;
- Undisturbed or less disturbed habitat that conserves native biodiversity by providing areas where nonnative invasive species are rare, uncommon, or absent;
- Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land;
- Opportunities for people to enjoy high-quality non-motorized recreation activities;

- "Reference landscapes" that can provide comparison areas for scientists seeking to evaluate and monitor the differences between natural settings and more intensely managed areas;
- High quality scenery that contributes directly to local tourism and to real estate values in neighboring communities; and
- Many important Native American cultural sites and valuable historical resources.[1]

We request that the final RMP/EIS include a thorough examination of the impacts of allowing development in roadless areas. The EIS should study, describe and discuss the following issues for each alternative as they specifically relate to the roadless areas:

- The projected amount and impact of ground disturbance, both temporary and permanent;
- The risks of reducing water quality;
- Impacts to air quality;
- The consequences of development on fire and fuels management;
- Impacts to terrestrial animal habitat, including fragmentation and connectivity, edge effects and habitat suitability and effectiveness;
- Impacts to threatened, endangered, proposed and sensitive species;
- Impacts to research, monitoring and reference landscapes;
- Consequences for non-mechanized and mechanized recreation;
- Impacts to scenic quality; and
- Consequences to heritage resources.

<u>The need to properly identify and evaluate areas with wilderness characteristics</u>

The BLM may manage a roadless area to protect and/or preserve some or all of its wilderness characteristics through the land use planning process. In addition, under the land use planning process, the BLM must consider a range of alternatives for the lands identified with wilderness characteristics. This gives the public the ability to fully compare the consequences of protecting or not protecting the wilderness characteristics on these non-wilderness study area lands.

The BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)). Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, section 103(c) (43 U.S.C. §1702(c)).) The FLPMA intended

[1] USDA-USFS, *Forest Service Roadless Area Conservation Final Environmental Impact Statement,* November, 2000, Chapter 3, pages 3-7.

for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations.

In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs the agency to:

> identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics.

In 2004, the BLM settled the ongoing litigation with the State of Utah (Utah v. Norton Settlement Agreement). It was acknowledged that the BLM may continue to inventory public lands for resources or other values, including wilderness characteristics, as a part of managing the public lands and land use planning.

Section 201 of FLPMA directs the Secretary to:

> prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern. This inventory shall be kept current so as to reflect changes in conditions and to identify new and emerging resource and other values.

The BLM's 1979 *Wilderness Inventory Handbook: Policy, Direction, Procedures, and Guidance for Conducting Wilderness Inventory on the Public Lands* (WIH) is still a reliable guide to assessing an area's wilderness characteristics. The WIH guides BLM staff in assessing the following factors:

- Size;
- Naturalness;
- Solitude;
- A primitive or unconfined type of recreation;
- Supplemental values; and
- The possibility of disturbed areas returning to a natural condition.[2]

Based on our experiences with a few other BLM offices, we think that a short discussion of each of these factors would be helpful.

<u>Size</u>**:** The WIH defines a roadless area as "the absence of roads which have been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road."[3] The old fire lines and

[2] WIH, page 12.
[3] *Ibid.,* page 16.

mining access routes that mar much of San Diego County's public lands are the very definition of ways "maintained solely by the passage of vehicles."

Naturalness**:** Please note that the BLM's Arcata Field Office found a 5,885-acre portion of the Headwaters Forest Reserve to have an acceptable level of naturalness despite the fact that 2,540 acres of it (a full 43 percent) had been logged in the 1980s.[4] Visually speaking, the impact of logging, especially clearcut logging, is far more striking to the casual observer than is a series of scattered narrow, old fire lines that mar many South Coast BLM lands. Many areas with chaparral have similarly been marred by bulldozer lines during fires, including areas that are designated wilderness such as the Ventana Wilderness in the Los Padres NF. Similarly, Congress designated BLM lands at Cache Creek as wilderness in 2006 and Beauty Mountain and Granite Mountain as wilderness in 2009 despite the fact that all three were marred by many miles of old fire lines and closed four-wheel drive routes. Likewise, the South Fork Eel Wilderness was designated by Congress in 2006 despite the fact that it was pockmarked with mining adits and dozens of four-wheel drive routes accessing former mining claims. Despite these impacts, the fact remains that Congress found that Cache Creek, South Fork Eel and dozens of similarly damaged areas to be "affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable."

In addition, as the WIH notes:

> House Report 95-540 cited specific examples of impacts to naturalness that may be allowed, in certain cases in a designated wilderness area, and, therefore, in a Wilderness Study Area: trails, trail signs, bridges, fire towers, fire breaks, fire presuppression facilities, pit toilets, fisheries enhancement facilities (such as fish traps and stream barriers), fire rings, hitching posts, snow gauges, water quantity and quality measuring devices, and other scientific devices, wildlife enhancement facilities, radio repeater sites, air quality monitoring devices, fencing, and spring development.

Old fire lines fit quite well into this list of allowable disturbances.

Lastly, please remember that the WIH states that "[i]mprints of man outside the inventory unit will not normally be considered in assessing naturalness of a unit."[5] This is a critically important point, because recent land management plans produced by the US Forest Service (USFS) have largely relied upon "sights and sounds" criteria, rather than an area's undeveloped character, to decide whether or not roadless areas should be recommended for wilderness designation. In so doing, the USFS acted contrarily to long-standing direction from Congress to avoid using sights, sounds and other external influences to judge an area's wilderness quality. For example, during Subcommittee Hearings for the 1978 Endangered American Wilderness Act Congress found that:

> . . . many areas, including the Lone Peak [outside Salt Lake City]…, received lower wilderness quality ratings because the Forest Service implemented a "sights and sounds"

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[4] USDI-BLM and CDFG, *Headwaters Forest Reserve Proposed Resource Management Plan and Final Environmental Impact Statement/Environmental Impact Report*, September, 2003, Appendix G, pages 2-3.
[5] WIH, *op. cit.*, page 13.

> doctrine which subtracted points in areas where the sights and sounds of nearby cities (often many miles away) could be perceived from anywhere within the area. This eliminated many areas near population centers and has denied a potential nearby high quality wilderness experience to many metropolitan residents, and is inconsistent with Congress' goal of creating parks and locating wilderness areas in close proximity to population centers. The committee is therefore in emphatic support of the Administration's decision to immediately discontinue this "sights and sounds" doctrine.[6]

During Senate hearings on the Endangered American Wilderness Act, Dr. M. Rupert Cutler, the Assistant Secretary of Agriculture, assured Senator Pete Domenici (R-NM) that "…there is no reference in the Wilderness Act to criteria for wilderness that includes such things as the sights, sounds, and smells of civilization which is a set of criteria which has been misapplied to wilderness areas."[7] We stress these points in the hope that the BLM will not unfairly point to outside disturbances and claim that the sights and sounds of civilization invalidate all of the wildness that is within a particular roadless area. Please note that Congress has designated many wilderness areas, such as San Jacinto in the San Bernardino National Forest and San Mateo Canyon in the Cleveland National Forest that are immediately adjacent to urban areas.

<u>Outstanding opportunities for solitude</u>
The Wilderness Act defines an area with wilderness characteristics as a region with "outstanding opportunities for solitude *or* a primitive and unconfined form of recreation." As you can see by the use of the word "or," an area does not have to offer both.

The WIH states that in making a determination as to whether or not an area provides outstanding opportunities for solitude:

> ...consider factors which influence solitude only as they affect a person's opportunity to avoid the sights, sounds, and evidence of other people in the inventory unit. Factors or elements influencing solitude may include size, natural screening, and ability of the user to find a secluded spot. It is the combination of these and similar elements upon which an overall solitude determination will be made. It may be difficult, for example, to avoid the sights and sounds of people in a flat open area unless it is relatively large. A small area, however, may provide opportunities for solitude if, due to topography or vegetation, visitors can screen themselves from one another.[8]

The combination of vegetation, rugged topography, boulders and other features on San Diego County's BLM lands makes it relatively easy for visitors to simply "get away from it all," something that may become increasingly scare in the region in the years to come.

<u>Outstanding opportunities for a primitive and unconfined type of recreation</u>
Taken as a whole, the majority of public and private lands in San Diego County are heavily roaded. Private lands are primarily dominated by agricultural and urban/suburban landscapes.

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[6] House Report 95-540, 95th Congress, July 27, 1977, page 5.
[7] Subcommittee on Parks and Recreation of the Committee on Energy and Natural Resources, US Senate on S. 1180, September 19 & 20, 1977, Publication No. 95-88, Committee on Energy and Natural Resources, page 41.
[8] WIH, *ibid.*

While it might be possible to find peace and quiet on some of the larger ranches, visitors would need the permission of the landowner to use them legally. While people are generally free (within the constraints of law and policy) to roam on USFS and BLM lands in the region, the majority are not roadless.

We therefore believe that all roadless areas, both those that are designated as wilderness and those that remain unprotected, offer “outstanding” opportunities for a primitive and unconfined type of recreation" just by virtue of the fact that they are roadless.

The WIH states that in making a determination as to whether or not an area provides outstanding opportunities for a primitive and unconfined type of recreation:

> consider those activities that provide dispersed, undeveloped recreation which do not require facilities or motorized equipment. Some examples of primitive and unconfined types of recreation are: hiking, backpacking, fishing, hunting, spelunking, horseback riding, mountain or rock climbing, river running, cross country skiing, snowshoeing, dog sledding, photography, bird watching, canoeing, kayaking, sailing. and sightseeing for botanical, zoological, or geological features.

Supplemental values

The WIH notes that while the Wilderness Act does not require wilderness-caliber lands to contain additional ecological, recreational, historical, geological or other values, it is important to record their presence.[9]

The possibility of returning to a natural condition

If the BLM considers old bulldozer lines to be "substantially noticeable,” the WIH states that areas “may be further considered for designation as a Wilderness Study Area when it is reasonable to expect the imprint of man's work to return or be returned to a *substantially unnoticeable* level either by natural processes or by hand labor.”[10] This is critically important because in chaparral habitat in particular an effectively blocked fireline or minor way can recover in fairly short order.

Our analysis of areas with wilderness characteristics

Using the WIH as our guide, we identified sixteen areas with wilderness characteristics (AWC). Of these, the BLM includes seven as "wilderness characteristic units" (WCU) in Appendix N of the DRMP/DEIS. We concur with the BLM's findings regarding all of the WCUs, and we request that WCUs 1, 3 and 7-11 be managed in such a way as to maintain their wilderness character.

The following AWCs were not included in Appendix N because the BLM did not identify them as WCUs. Please refer to the maps included with this letter while reviewing our analysis.

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[9] WIH, op. cit., page 14.
[10] *Ibid.*

- **Parcel number (see our attached maps):** AWC 1
- **Parcel location (see our attached maps):** 0.2 miles west of the Hauser Mountain WSA, bordering WCU 7, in T. 17S, R. 04E, Sections 33-35, SBM.
- **"Changes in condition" that warrant an updated review of the parcel's wilderness characteristics:** The parcel's wilderness characteristics have not been studied since the parcel identified by the BLM as WCU 7 was acquired. The acquisition of WCU 7 creates an unbroken connection of BLM land between the Hauser Mountain WSA and this parcel for the first time. Its wilderness characteristics should therefore have been reexamined in the DRMP/DEIS.
- **Size:** 569 acres. However, the area can only properly be considered as part of a larger, interconnected roadless region that includes: WCU 7 (280 acres), WCU 8 (161 acres), WCU 9 (80 acres), AWC 2 (135 acres) AWC 3 (7 acres), AWC 4 (44 acres) AWC 5 (648 acres) and the 5,540-acre Hauser Mountain WSA for a total of 6,895 acres.
- **Naturalness:** We assessed the naturalness of this parcel using aerial photographs taken on 5/6/10, the OHV Area Designations & Routes of Travel maps in the DRMP/DEIS and US Geological Survey (USGS) quadrangle map and BLM surface management maps. If the boundaries are drawn in the manner that is shown on our map labeled "Additional AWC #1," then the area is virtually undisturbed. A copy of the aerial photograph is attached to our comments. As you can see, AWC 1 does not include any roads, ways or other routes nor does it include any of the usually ubiquitous bulldozer scars from wildfire suppression efforts.
- **Opportunities for solitude:** The terrain ungulates and is covered with chaparral and countless large boulders. This would make it easy for visitors to avoid contact with one another. In addition, the parcel must be considered in conjunction with the neighboring 6,895 acres of interconnected roadless BLM lands. The area is therefore part of a 10.7 square-mile virtual island of solitude.
- **Opportunities for a primitive or unconfined type of recreation:** Though the area is trackless, it can still support cross-country hiking, hunting and other activities. Its recreation potential must be considered in the context of the overall 6,895 acres of BLM land.
- **Supplemental values:** It is a mere 0.5 miles from the PCT and it may serve as an increasingly important buffer from "civilization" for those seeking to enjoy the famous route in the decades to come. In addition, the California Department of Fish and Game's (CDFG) California Natural Diversity Database (CNDDB) states that the following species occur in the USGS' Lake Morena quadrangle in which the area is located:

COMMON NAME	**FEDERAL STATUS**	**CA STATUS**	**DFG STATUS**	**CA NATIVE PLANT SOCIETY LIST**
arroyo toad	Endangered	None	Species of special concern (SSC)	
coast horned lizard	None	None	SSC	
Dean's milk-vetch	None	None		Plants rare, threatened, or endangered in CA &

				elsewhere (1B.1)
delicate clarkia	None	None		Plants rare, threatened, or endangered in CA, but more common elsewhere (1B.2)
Dulzura pocket mouse	None	None	SSC	
Dunn's mariposa-lily	None	Rare		1B.2
Gander's ragwort	None	Rare		1B.2
golden eagle	None	None	Fully protected (FP) | Watch list (WL)	
Jacumba milk-vetch	None	None		1B.2
least Bell's vireo	Endangered	Endangered		
Moreno currant	None	None		1B.3
northwestern San Diego pocket mouse	None	None	SSC	
Orcutt's brodiaea	None	None		1B.1
Orcutt's linanthus	None	None		Plants about which we need more information (1B.3)
pocketed free-tailed bat	None	None	SSC	
prairie falcon	None	None	WL	
San Diego gumplant	None	None		1B.2
southern jewel-flower	None	None		1B.3
southern mountains skullcap	None	None		1B.2
Tecate tarplant	None	None		1B.2
tricolored blackbird	None	None	SSC	
two-striped garter snake	None	None	SSC	
velvety false lupine	None	None		1B.2
western mastiff bat	None	None	SSC	
western pond turtle	None	None	SSC	
western red bat	None	None	SSC	
western small-footed myotis	None	None		
Yuma myotis	None	None		

As this extensive list reveals, the region around the parcel has significant biological diversity and this should be taken into consideration when the BLM considers the parcel's wilderness characteristics.

- **The possibility of the area returning to a natural condition:** Our proposed boundaries exclude all unnatural disturbances.

- **Parcel number (see our attached maps):** AWC 2
- **Parcel location (see our attached maps):** 0.6 miles north of the Hauser Mountain WSA, bordering WCU 7, in T. 17S, R. 04E, Section 35, SBM.
- **"Changes in condition" that warrant an updated review of the parcel's wilderness characteristics:** The parcel's wilderness characteristics have not been studied since the parcel identified by the BLM as WCU 7 was acquired. The acquisition of WCU 7 creates an unbroken connection of BLM land between the Hauser Mountain WSA and this parcel for the first time. Its wilderness characteristics should therefore have been reexamined in the DRMP/DEIS.
- **Size:** 135 acres. However, the area can only properly be considered as part of the larger, interconnected roadless region of 6,895 acres described under "size" in the entry for AWC 1.
- **Naturalness:** We assessed the naturalness of this parcel using the same methods described under "size" in the entry for AWC 1. If the boundaries are drawn in the manner that is shown on our map labeled "Additional AWCs 2-4," then the area has four ways that total 1.58 miles in length. While these routes look somewhat significant from the air, probably because of use by the Border Patrol, the three longest of them enter WCU 7 that the BLM found to have wilderness characteristics. Map 2-54 in the DRMP/DEIS appears to indicate that under the Preferred Alternative none of these routes will be open to the public.
- **Opportunities for solitude:** The terrain ungulates and is covered with chaparral, trees along the north-south regional drainage and countless large boulders. This would make it easy for visitors to avoid contact with one another. In addition, the parcel must be considered in conjunction with the neighboring 6,895 acres of interconnected roadless BLM lands. The area is therefore part of a 10.7 square-mile virtual island of solitude.
- **Opportunities for a primitive or unconfined type of recreation:** The parcel's 1.58 miles of ways are a ready-made trail network. Its recreation potential must be considered in the context of the overall 6,895 acres of roadless BLM land.
- **Supplemental values:** Its northern portion is a mere 280' west of the PCT and it may serve as an increasingly important buffer from "civilization" for those seeking to enjoy the famous route in the decades to come. As the extensive species list noted above for AWC 1 reveals, the region around the parcel has significant biological diversity and this should be taken into consideration when the BLM considers the parcel's wilderness characteristics.
- **The possibility of the area returning to a natural condition:** If unauthorized vehicle use of the parcel's ways is effectively prevented, the area's wild character should improve further over time.

- **Parcel number (see our attached maps):** AWC 3
- **Parcel location (see our attached maps):** 767' northwest of the Hauser Mountain WSA, bordering WCU 7 and AWC 1 in T. 17S, R. 04E, Section 35, SBM.
- **"Changes in condition" that warrant an updated review of the parcel's wilderness characteristics:** The parcel's wilderness characteristics have not been studied since the parcel identified by the BLM as WCU 7 was acquired. The acquisition of WCU 7 creates an unbroken connection of BLM land between the Hauser Mountain WSA and this parcel

for the first time. Its wilderness characteristics should therefore have been reexamined in the DRMP/DEIS.

- **Size:** 7 acres. However, the area can only properly be considered as part of the larger, interconnected roadless region of 6,895 acres described under "size" in the entry for AWC 1.
- **Naturalness:** We assessed the naturalness of this parcel using the same methods described under "size" in the entry for AWC 1. If the boundaries are drawn in the manner that is shown on our map labeled "Additional AWCs 2-4," then the area has one way that totals 0.25 miles in length. While the route looks somewhat significant from the air, probably because of use by the Border Patrol, it enters WCU 7 that the BLM found to have wilderness characteristics. Map 2-54 in the DRMP/DEIS appears to indicate that under the Preferred Alternative the route will not be open to the public.
- **Opportunities for solitude:** The terrain ungulates and is covered with chaparral, trees and a few large boulders. The parcel must be considered in conjunction with the neighboring 6,895 acres of interconnected roadless BLM lands. The area is therefore part of a 10.7 square-mile virtual island of solitude.
- **Opportunities for a primitive or unconfined type of recreation:** The way in the parcel already functions as a trail. The parcel's recreation potential must be considered in the context of the overall 6,895 acres of BLM land.
- **Supplemental values:** Its northern portion is a mere 0.6 miles west of the PCT and it may serve as an increasingly important buffer from "civilization" for those seeking to enjoy the famous route in the decades to come. As the extensive species list noted above for AWC 1 reveals, the region around the parcel has significant biological diversity and this should be taken into consideration when the BLM considers the parcel's wilderness characteristics.
- **The possibility of the area returning to a natural condition:** If unauthorized vehicle use of the parcel's way is effectively prevented, the area's wild character should improve further over time.

- **Parcel number (see our attached maps):** AWC 4
- **Parcel location (see our attached maps):** It borders the western side of the Hauser Mountain WSA, the southern side of WCU 7 and WCU 3. in T. 17S, R. 04E, Section 35, SBM and T. 18S, R. 04E, Section 2, SBM
- **"Changes in condition" that warrant an updated review of the parcel's wilderness characteristics:** The parcel's wilderness characteristics have not been studied since the parcel identified by the BLM as WCU 7 was acquired. The acquisition of WCU 7 creates an unbroken connection of BLM land between the Hauser Mountain WSA and this parcel for the first time. In addition, the way that once separated the WSA from this parcel is no longer receiving regular vehicle use. It is largely overgrown as vehicle use has shifted to the route to the west. As a result of these two changed circumstances the parcel's wilderness characteristics should have been reexamined in the DRMP/DEIS.
- **Size:** 44 acres. However, the area can only properly be considered as part of the larger, interconnected roadless region of 6,895 acres described under "size" in the entry for AWC 1.
- **Naturalness:** We assessed the naturalness of this parcel using the same methods described under "size" in the entry for AWC 1. If the boundaries are drawn in the manner

that is shown on our map labeled "Additional AWCs 2-4," then the area has one way that totals 0.59 miles in length. The route appears to be little traveled, and portions of it appear to be overgrown. It also enters WCU 7 that the BLM found to have wilderness characteristics. Map 2-54 in the DRMP/DEIS appears to indicate that under the Preferred Alternative this route will not be open to public vehicle use.

- **Opportunities for solitude:** The terrain is gentle, but it is covered with chaparral, trees, grassland and a few large boulders. This would make it easy for visitors to avoid contact with one another. In addition, the parcel must be considered in conjunction with the neighboring 6,895 acres of interconnected roadless BLM lands. The area is therefore part of a 10.7 square-mile virtual island of solitude.
- **Opportunities for a primitive or unconfined type of recreation:** The parcel's 0.59-mile long way already functions as a trail. Its recreation potential must be considered in the context of the overall 6,895 acres of BLM land.
- **Supplemental values:** Its northern portion is a mere 0.53 miles southwest of the PCT and it may serve as an increasingly important buffer from "civilization" for those seeking to enjoy the famous route in the decades to come. As the extensive species list noted above for AWC 1 reveals, the region around the parcel has significant biological diversity and this should be taken into consideration when the BLM considers the parcel's wilderness characteristics.
- **The possibility of the area returning to a natural condition:** If unauthorized vehicle use of the parcel's way is effectively prevented, the area's wild character should improve further over time.

- **Parcel number (see our attached maps):** AWC 5
- **Parcel location (see our attached maps):** Borders the northeastern side of the Hauser Mountain WSA and it is also adjacent to WCU 7-9 and AWC 2 in T. 17S, R. 04E, Sections 35-36, SBM, T. 17S, R. 05E, Section 31, SBM and T. 18S, R. 04E, Section 1, SBM.
- **"Changes in condition" that warrant an updated review of the parcel's wilderness characteristics:** The parcel's wilderness characteristics have not been studied since the parcels identified by the BLM as WCU 7-9 were acquired. In addition, the ways that once separated the parcel from the Hauser Mountain WSA are no longer open to public vehicle use. As a result, the parcel is part of an unbroken swath of BLM land that is 6,895 acres in size. Lastly, the parcel's wilderness values were not reconsidered after the PCT was established in its current alignment and added to the National Landscape Conservation System. Presently, 2.89 miles of the PCT pass through the parcel before entering the WSA. These three important factors make the area deserving of another look at its wilderness characteristics in the DRMP/DEIS.
- **Size:** 648 acres. However, the area can only properly be considered as part of the larger, interconnected roadless region of 6,895 acres described under "size" in the entry for AWC 1.
- **Naturalness:** We assessed the naturalness of this parcel using the same methods described under "size" in the entry for AWC 1. If the boundaries are drawn in the manner that is shown on our map labeled "Additional AWC 5," then the area has five ways that total 1.83 miles in length. While these routes look somewhat significant from the air, probably because of use by the Border Patrol, all of them enter either the WSA or WCUs

7-9 that the BLM concedes have wilderness characteristics. Map 2-54 in the DRMP/DEIS appears to indicate that under the Preferred Alternative none of these routes will be open to public vehicle use.

- **Opportunities for solitude:** The terrain ungulates and is covered with chaparral, trees, grasslands and countless large boulders. This would make it easy for visitors to avoid contact with one another. In addition, the parcel must be considered in conjunction with the neighboring 6,895 acres of interconnected roadless BLM lands. The area is therefore part of a 10.7 square-mile virtual island of solitude.
- **Opportunities for a primitive or unconfined type of recreation:** The parcel's 1.83 miles of ways and 2.89 miles of the PCT represent a significant recreation resource. Its recreation potential must also be considered in the context of the overall 6,895 acres of BLM land.
- **Supplemental values:** Its 2.89 miles of the PCT is a very nationally-significant amenity. As the extensive species list noted above for AWC 1 reveals, the region around the parcel has significant biological diversity and this should be taken into consideration when the BLM considers the parcel's wilderness characteristics.
- **The possibility of the area returning to a natural condition:** If unauthorized vehicle use of the parcel's ways is effectively prevented, the area's wild character should improve further over time.

- **Parcel number (see our attached maps):** AWC 6
- **Parcel location (see our attached maps):** Borders the northern side of the Cleveland National Forest's (CNF) Caliente Inventoried Roadless Area (IRA) in T. 9S, R. 03E, Sections 22-23 and 25-26-36, SBM.
- **"Changes in condition" that warrant an updated review of the parcel's wilderness characteristics:** The parcel's wilderness characteristics have not been studied in conjunction with the adjacent CNF IRA. This is even more important and appropriate given that the USFS' Roadless Area Conservation Rule has been upheld by the federal courts, and also because the Caliente IRA is one of 37 roadless areas that were the subject of a court victory that occurred almost exactly a year ago. In 2006 the USFS completed land management plans for the four southern California national forests. Then-Governor Schwarzenegger, conservation groups and then-Attorney General Brown objected to the fact that over 900,000 acres of roadless areas were opened to road building and other development activities by these plans. In fact, the USFS only recommended that 7% of the roadless acreage in the four forests be designated as wilderness. We filed an appeal asking the agency to reconsider its decision. When the USFS refused to do so, we brought the matter before a federal judge. In 2009 a federal district court agreed with conservation groups and the State of California and ruled that the USFS' plans violate NEPA. The parties then agreed to negotiate a settlement. The settlement that the various stakeholders reached in December of 2010 requires the USFS to prepare an SEIS to the four forest plans that will carefully examine the recreational, scenic, historical and ecological values of 37 southern California roadless areas. The supplement will then include recommendations regarding whether or not the 37 areas should be protected from road construction and other development activities (except in the case of fire or other emergencies, of course). This could result in some of them being recommended for wilderness designation, or in all or some of them simply being reopened to development.

The USFS has agreed to protect the roadless areas from development until the SEIS is approved.

- **Size:** 1,322 acres. However, the area can only properly be considered as part of the larger, interconnected roadless region that includes the 5,953-acre IRA, an additional 654 roadless acres of CNF land identified by the CWC, and the CWC's 658-acre AWC 7. It is therefore part of a larger 8,587-acre roadless region.
- **Naturalness:** We assessed the naturalness of this parcel using the same methods described under "size" in the entry for AWC 1. If the boundaries are drawn in the manner that is shown on our map labeled "Additional AWC 6," then the area has one way that is 1.38 miles in length and it also includes 1.4 miles of the Lost Valley Road. Neither of these routes are open to public vehicle use. Map 2-53 in the DRMP/DEIS appears to indicate that under the Preferred Alternative neither of these routes will be opened to the public.
- **Opportunities for solitude:** The terrain has mountains, ravines, washes, chaparral, trees, grasslands and countless large boulders. This makes it easy for visitors to avoid contact with one another. In addition, the parcel must be considered as part of a larger 8,587-acre roadless complex.
- **Opportunities for a primitive or unconfined type of recreation:** The Lost Valley Road is already used as a trail. For example, it is paralleled by the PCT in the Caliente IRA to the south. The parcel's recreation opportunities must be considered as part of a larger 8,587-acre roadless complex.
- **Supplemental values:** It is a mere 644' from the PCT and it may serve as an increasingly important buffer from "civilization" for those seeking to enjoy the famous route in the decades to come. In addition, the CDFG' CNDDB states that the following species occur in the USGS' Warner Springs quadrangle in which the area is located:

COMMON NAME	FEDERAL STATUS	CA STATUS	DFG STATUS	CA NATIVE PLANT SOCIETY LIST
arroyo chub	None	None	SSC	
arroyo toad	Endangered	None	SSC	
California Orcutt grass	Endangered	Endangered		1B.1
desert beauty	None	None		2.3
Dulzura pocket mouse	None	None	SSC	
Hall's monardella	None	None		1B.3
Jaeger's milk-vetch	None	None		1B.1
Mexican hulsea	None	None		2.3
Mojave tarplant	None	Endangered		1B.3
orangethroat whiptail	None	None	SSC	
Orcutt's brodiaea	None	None		1B.1
Orcutt's linanthus	None	None		1B.3
Otay manzanita	None	None		1B.2
Payson's jewel-flower	None	None		4.2
prairie falcon	None	None	WL	

San Bernardino aster	None	None		1B.2
San Diego hulsea	None	None		1B.3
San Diego milk-vetch	None	None		1B.2
southern mountains skullcap	None	None		1B.2
Stephens' kangaroo rat	Endangered	Threatened		
vanishing wild buckwheat	None	None		1B.1
Warner Springs lessingia	None	None		1B.3
Warner Springs shoulderband	None	None		

As this extensive list reveals, the region around the parcel has significant biological diversity and this should be taken into consideration when the BLM considers the parcel's wilderness characteristics.

- **The possibility of the area returning to a natural condition:** If unauthorized vehicle use of the parcel's ways is effectively prevented, the area's wild character should improve further over time.

- **Parcel number (see our attached maps):** AWC 7
- **Parcel location (see our attached maps):** Borders the northern side of roadless lands identified by the CWC in the CNF. These lands, in turn, border the CNF's Caliente IRA and AWC 6. It is located in T. 9S, R. 03E, Sections 20-22, SBM.
- **"Changes in condition" that warrant an updated review of the parcel's wilderness characteristics:** Please see the entry for AWC 6.
- **Size:** 658 acres. However, the area can only properly be considered as part of the larger, interconnected roadless region that includes the 5,953-acre IRA, an additional 654 roadless acres of CNF land identified by the CWC, and the CWC's 1,322-acre AWC 6. It is therefore part of a larger 8,587-acre roadless region.
- **Naturalness:** We assessed the naturalness of this parcel using the same methods described under "size" in the entry for AWC 1. If the boundaries are drawn in the manner that is shown on our map labeled "Additional AWC 7," then the area is virtually undisturbed.
- **Opportunities for solitude:** The terrain has hills, ravines, washes, chaparral, trees, grasslands and countless large boulders. This makes it easy for visitors to avoid contact with one another. In addition, the parcel must be considered as part of a larger 8,587-acre roadless complex.
- **Opportunities for a primitive or unconfined type of recreation:** Though the area is trackless, it can still support cross-country hiking, hunting and other activities. The California Riding and Hiking Trail is very close to the parcel. Its recreation potential must be considered in the context of the overall 8,587 acres of BLM land.
- **Supplemental values:** As the extensive species list noted above for AWC 6 reveals, the region around the parcel has significant biological diversity and this should be taken into consideration when the BLM considers the parcel's wilderness characteristics. The area serves as a scenic, undisturbed viewshed for people using the California Riding and Hiking Trail. This is important given the increasing development occurring in the Chihuahua Valley and other nearby communities.

- **The possibility of the area returning to a natural condition:** It is already virtually undisturbed.

- **Parcel number (see our attached maps):** AWC 8
- **Parcel location (see our attached maps):** Is 882' south of the Beauty Mountain WSA and 0.67 miles south of the Beauty Mountain Wilderness. Its eastern border abuts WCU 10. It is located in T. 9S, R. 02E, Sections 10-15, SBM and T. 9S, R. 03E, Sections 5-7 and 18.
- **"Changes in condition" that warrant an updated review of the parcel's wilderness characteristics:** The parcel's wilderness characteristics have not been studied since the parcel identified by the BLM as WCU 10 was acquired. The acquisition of WCU 10 creates an unbroken connection of BLM wild land between AWC 8, WCU 10, the Beauty Mountain WSA and the Beauty Mountain Wilderness. Its wilderness characteristics should therefore have been reexamined in the DRMP/DEIS.
- **Size:** 3,243 acres. However, the area can only properly be considered as part of the larger, interconnected roadless region of roughly 25,300 acres that includes the 11,364-acre WSA, 1,800-acre WCU and the roughly 8,900 acres of the Beauty Mountain Wilderness that is west of the Cooper Cienega Truck Trail.
- **Naturalness:** We assessed the naturalness of this parcel using the same methods described under "size" in the entry for AWC 1. If the boundaries are drawn in the manner that is shown on our map labeled "Additional AWC 8," then the area contains a 2.8-mile way the is followed by a maintained fuelbreak. This same way and fuelbreak is in WCU 10, and a very similar way and fuelbreak are in WCU 11.
- **Opportunities for solitude:** The parcel has hills, ravines, washes, chaparral, trees, grasslands and countless large boulders. This makes it easy for visitors to avoid contact with one another. In addition, the parcel must be considered as part of a larger 25,300-acre roadless complex.
- **Opportunities for a primitive or unconfined type of recreation:** The 2.8-mile way is already used as a trail. The California Riding and Hiking Trail and Cooper Cienega Truck Trail are only 1.3 miles to the east. The area serves as a scenic, largely undisturbed viewshed for people using the California Riding and Hiking Trail. This is important given the increasing development occurring in the Chihuahua Valley and other nearby communities. The parcel's recreation potential must be considered in the context of the overall 25,300 acres of BLM land.
- **Supplemental values:** As the extensive species list noted above for AWC 6 reveals, the region around the parcel has significant biological diversity and this should be taken into consideration when the BLM considers the parcel's wilderness characteristics. The area serves as a scenic, undisturbed viewshed for people using the California Riding and Hiking Trail. This is important given the increasing development occurring in the Chihuahua Valley and other nearby communities.

COMMON NAME	FEDERAL STATUS	CA STATUS	DFG STATUS	CA NATIVE PLANT SOCIETY LIST
coast horned lizard	None	None	SSC	
coast patch-nosed snake	None	None	SSC	
desert beauty	None	None		2.3

Mojave tarplant	None	Endangered		1B.3
orangethroat whiptail	None	None	SSC	
prairie falcon	None	None	WL	
quino checkerspot butterfly	Endangered	None		
San Bernardino aster	None	None		1B.2
San Diego black-tailed jackrabbit	None	None	SSC	
San Diego milk-vetch	None	None		1B.2
Stephens' kangaroo rat	Endangered	Threatened		
Warner Springs lessingia	None	None		1B.3

As this extensive list reveals, the region around the parcel has significant biological diversity and this should be taken into consideration when the BLM considers the parcel's wilderness characteristics.

- **The possibility of the area returning to a natural condition:** It is already largely undisturbed except for the fuelbreak and associated way. These are closed to vehicles driven by the general public.

- **Parcel number (see our attached maps):** AWC 9
- **Parcel location (see our attached maps):** Is 0.47 miles south of the Beauty Mountain Beauty Mountain Wilderness and it is connected to the wilderness by WCU 11. It also borders designated wilderness in Anza-Borrego Desert State Park (ABDSP) for 2.2 miles. It is located in T. 9S, R. 03E, Sections 3-4 and 9-14, SBM.
- **"Changes in condition" that warrant an updated review of the parcel's wilderness characteristics:** The parcel's wilderness characteristics have not been studied since the parcel identified by the BLM as WCU 11 was acquired. The acquisition of WCU 11 creates an unbroken connection of BLM wild between AWC 9 and the Beauty Mountain Wilderness. In addition, on February 11, 2005 the California State Parks Commission designated the portion of ABDSP bordering the area as wilderness. As a result of these two important developments, its wilderness characteristics should have been reexamined in the DRMP/DEIS.
- **Size:** 3,095 acres. However, the area can only properly be considered as part of the larger, interconnected roadless region that includes ABDSP, WCU 11 and the portion of the Beauty Mountain Wilderness that is east of the Cooper Cienega Truck Trail.
- **Naturalness:** We assessed the naturalness of this parcel using the same methods described under "size" in the entry for AWC 1. If the boundaries are drawn in the manner that is shown on our map labeled "Additional AWC 9," then the area contains many bulldozer lines constructed during fires and several ways that were used for mining or to access former private lands. While these disturbances do mar the landscape, similar features are found in the existing Beauty Mountain Wilderness and WCUs 10-11. None of the ways or bulldozer lines meet the definition of a road provided in the WIH.
- **Opportunities for solitude:** The parcel has mountains, hills, ravines, washes, chaparral, trees, grasslands and countless large boulders. This makes it easy for visitors to avoid contact with one another. In addition, the parcel must be considered as part of a larger roadless region that includes ABDSP, WCU 11 and the Beauty Mountain Wilderness.

- **Opportunities for a primitive or unconfined type of recreation:** The many miles of ways are already used by visitors. The California Riding and Hiking Trail and Cooper Cienega Truck Trail are adjacent to the parcel and the PCT is 0.59 miles to the east. The parcel's recreation potential must be considered in the context of the adjacent ABDSP, WCU 11 and Beauty Mountain Wilderness.
- **Supplemental values:** As the extensive species list noted above for AWC 8 reveals, the region around the parcel has significant biological diversity and this should be taken into consideration when the BLM considers the parcel's wilderness characteristics. The area serves as a scenic viewshed for people using the California Riding and Hiking Trail and PCT. This is important given the increasing development occurring in the Chihuahua Valley and other nearby communities.

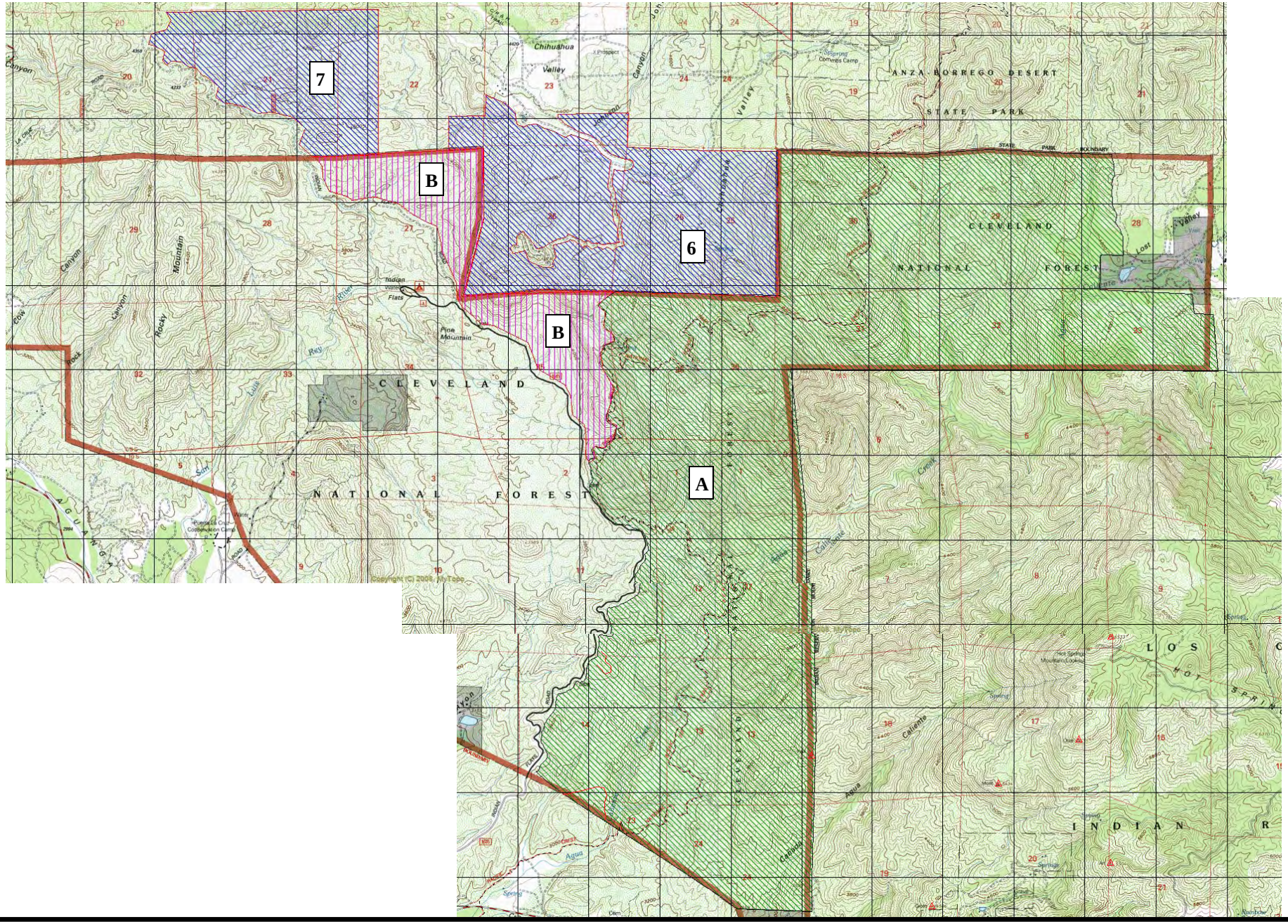
In closing, we support Alternative B and we urge you to adopt it as the Preferred Alternative. In addition, we request that the BLM:

- Assess the nine AWCs described above;
- Recognize that that they have wilderness characteristics; and
- Manage all nine of them in such a way as to protect their wilderness characteristics.

Thank you for considering our comments.

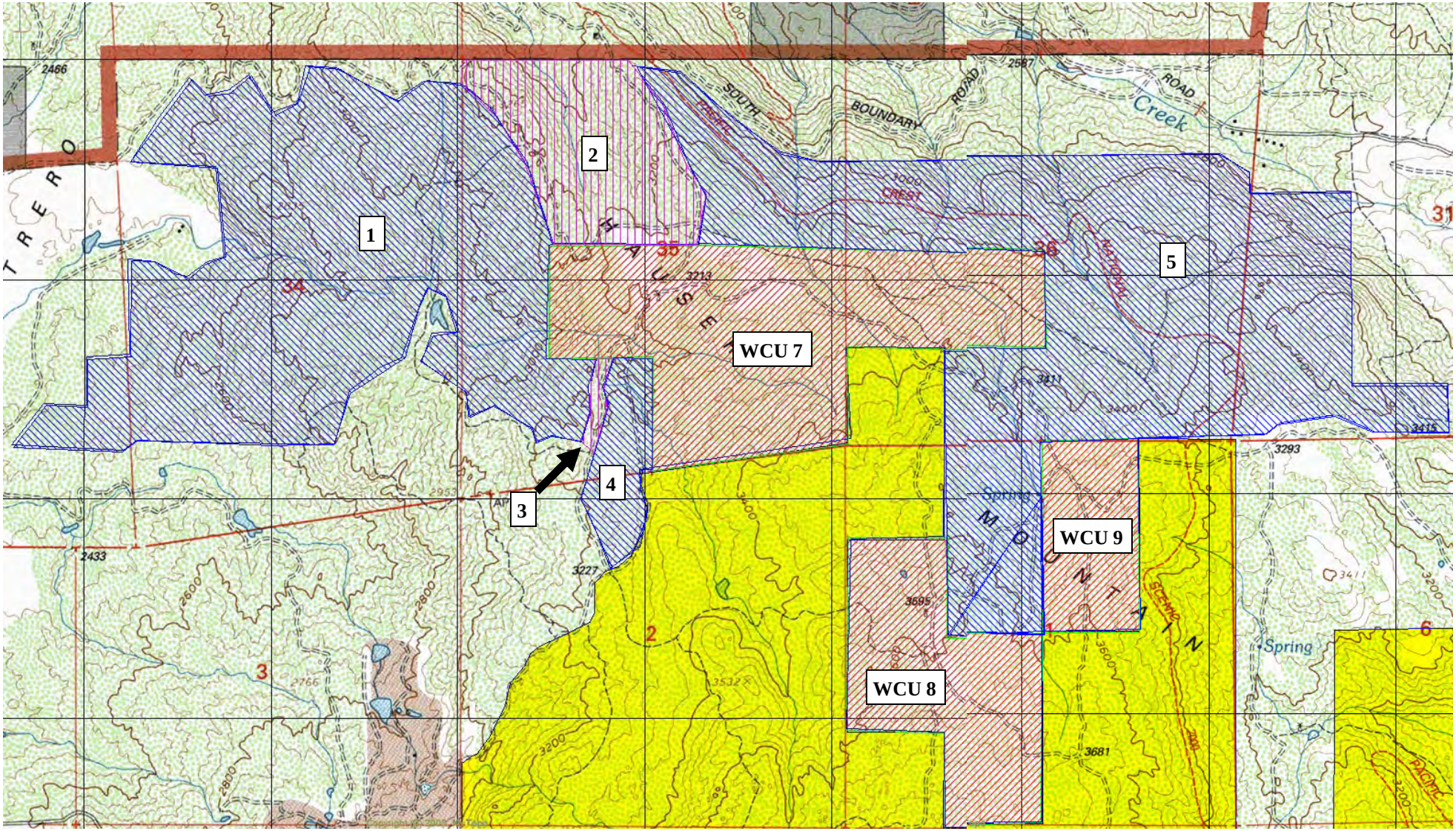
Sincerely,

Ryan Henson
Senior Conservation Director
California Wilderness Coalition
3313 Nathan Drive
Anderson, CA 96007
(O) 530-365-2737
(M) 530-902-1648
(F) 574-966-2324
E-mail: rhenson@calwild.org



Areas with wilderness characteristics adjacent to the Cleveland National Forest's (CNF) Caliente Inventoried Roadless Area (IRA)

- **The CNF's Caliente IRA**
- **BLM parcels with wilderness characteristics**
- **Additional wilderness-caliber CNF lands**



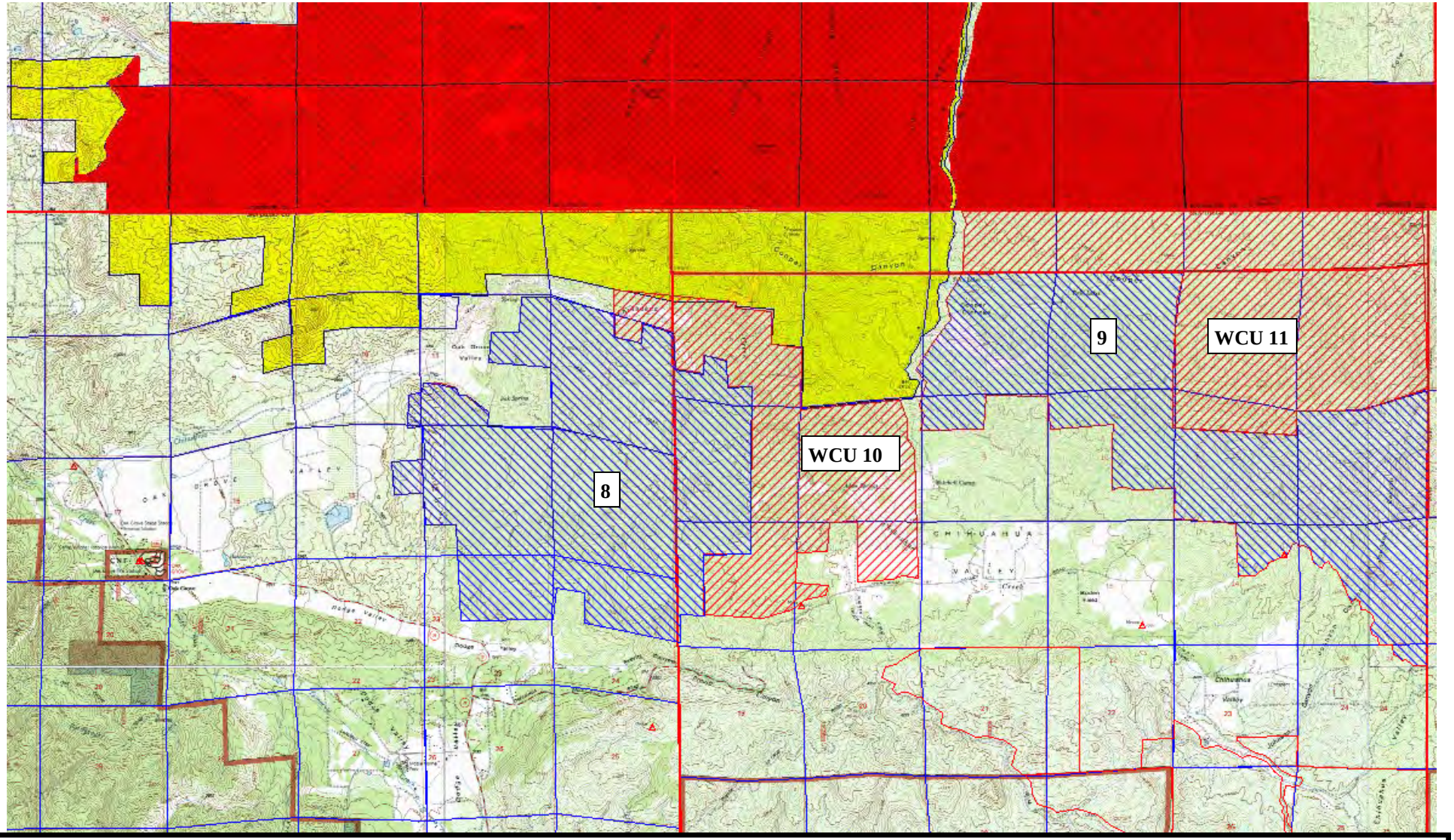
Areas with wilderness characteristics adjacent to Hauser Mountain WSA

Hauser Mountain WSA

BLM WCUs found to possess wilderness characteristics in the Draft RMP

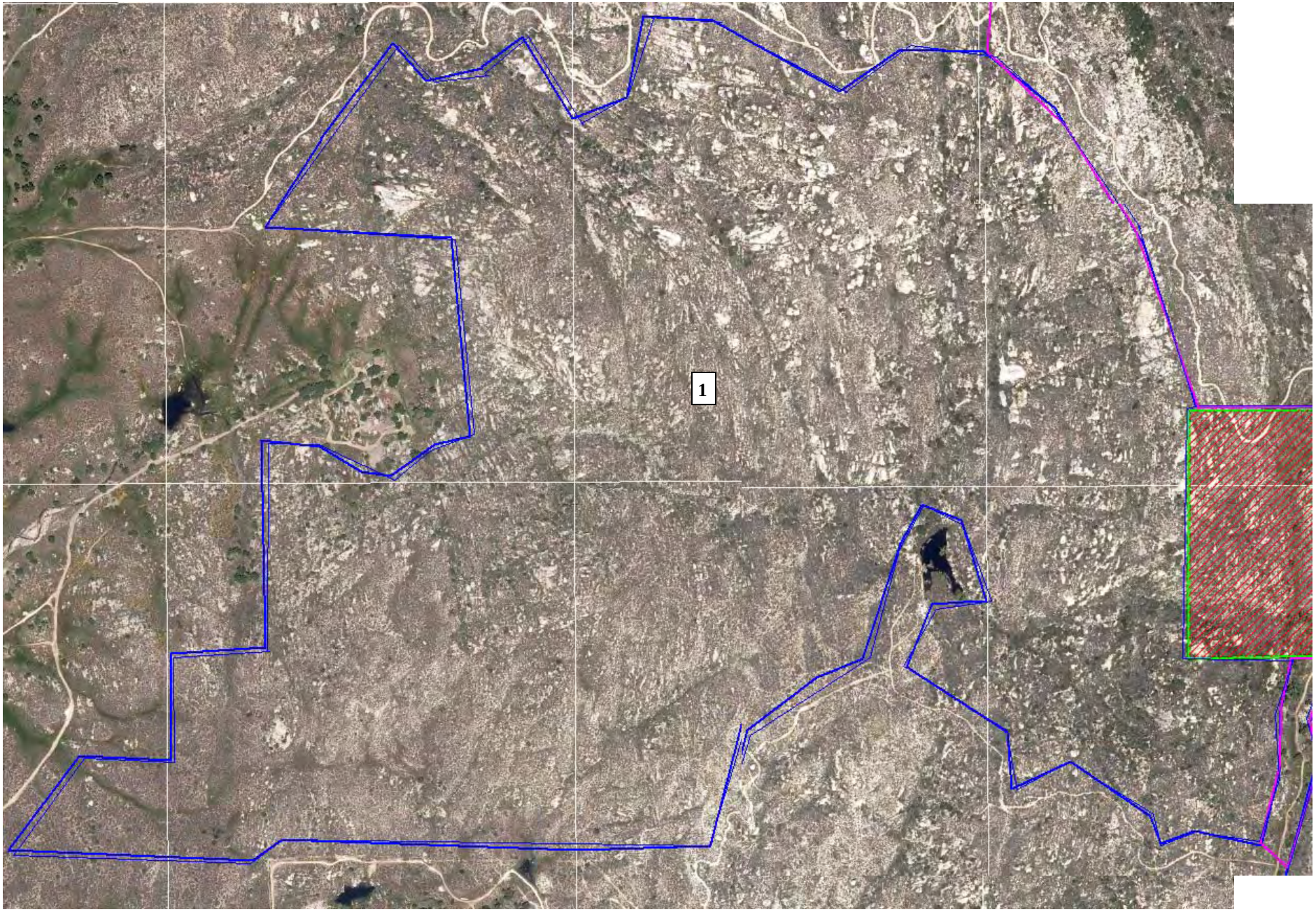
Additional areas with wilderness characteristics

Additional areas with wilderness characteristics *if* vehicle routes in the areas are not open to the public



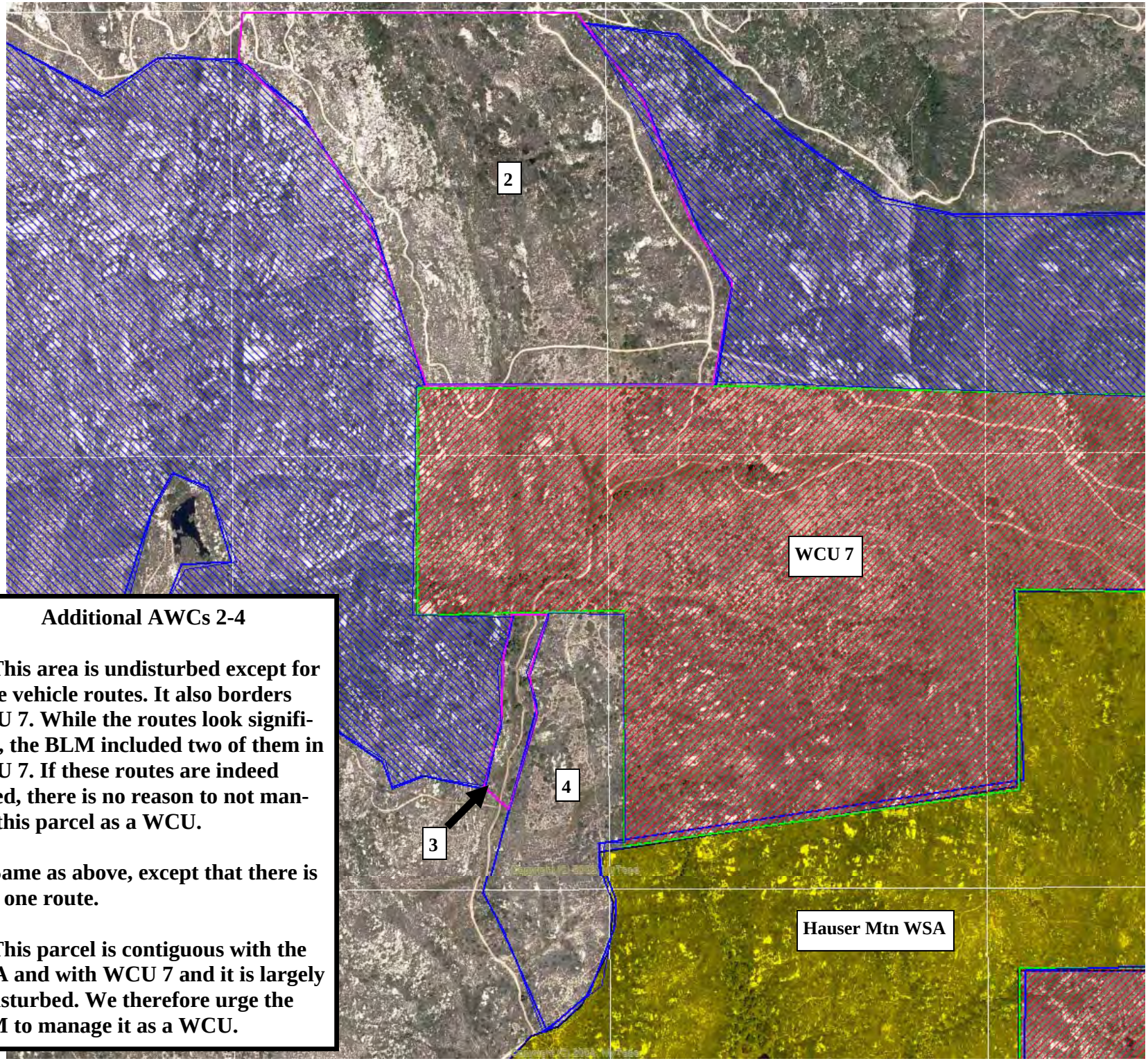
Areas with wilderness characteristics adjacent to the Beauty Mountain Wilderness

- **Beauty Mountain Wilderness**
- **Beauty Mountain WSA**
- **BLM WCUs found to possess wilderness characteristics in the Draft RMP**
- **Additional areas with wilderness characteristics**



Additional AWC #1

As one can see, this area is trackless and it borders WCU 7. In fact, it is less disturbed than the three BLM WCUs to the east . We therefore urge the BLM to manage it as a WCU.

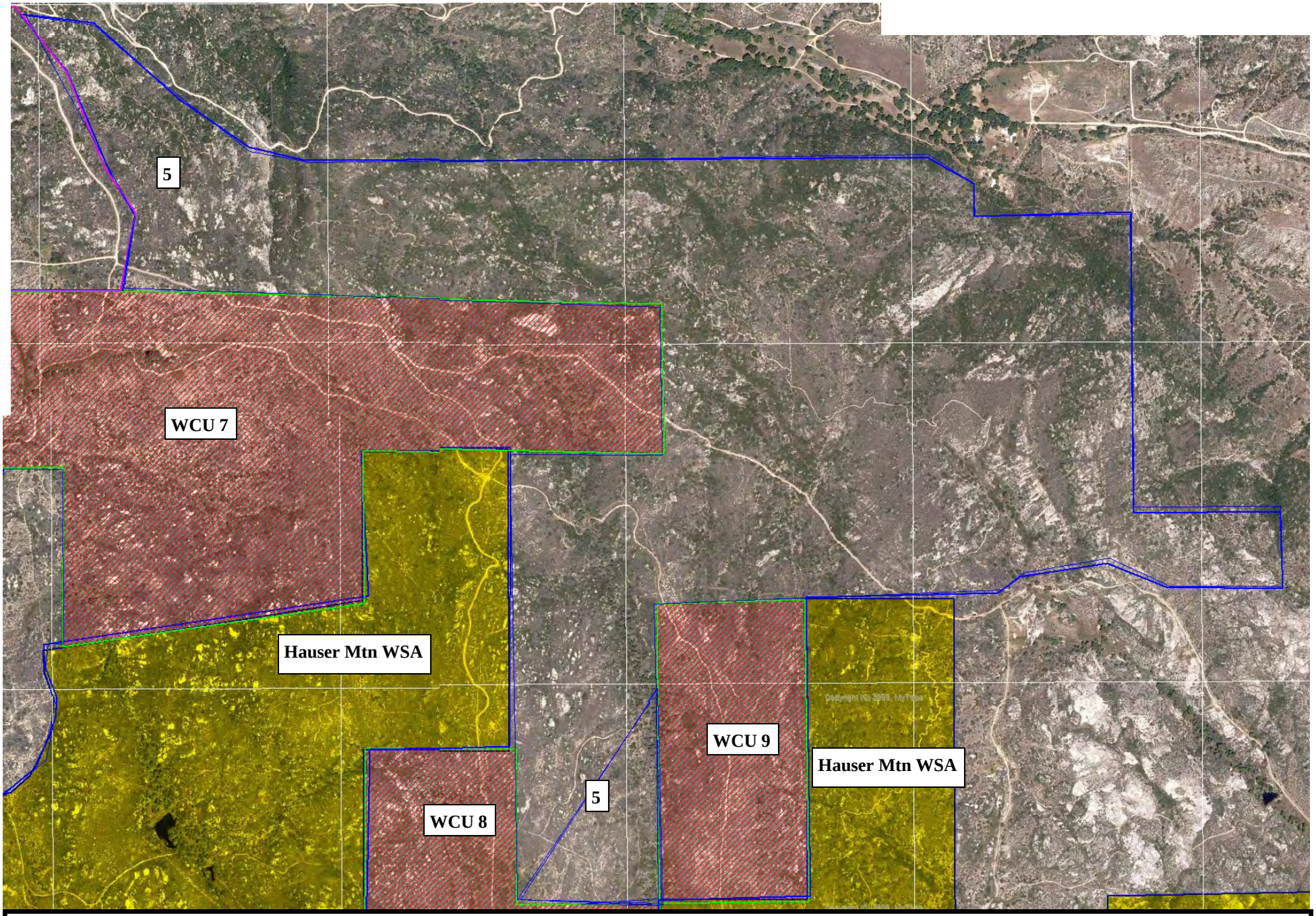


Additional AWCs 2-4

(2) This area is undisturbed except for three vehicle routes. It also borders WCU 7. While the routes look significant, the BLM included two of them in WCU 7. If these routes are indeed closed, there is no reason to not manage this parcel as a WCU.

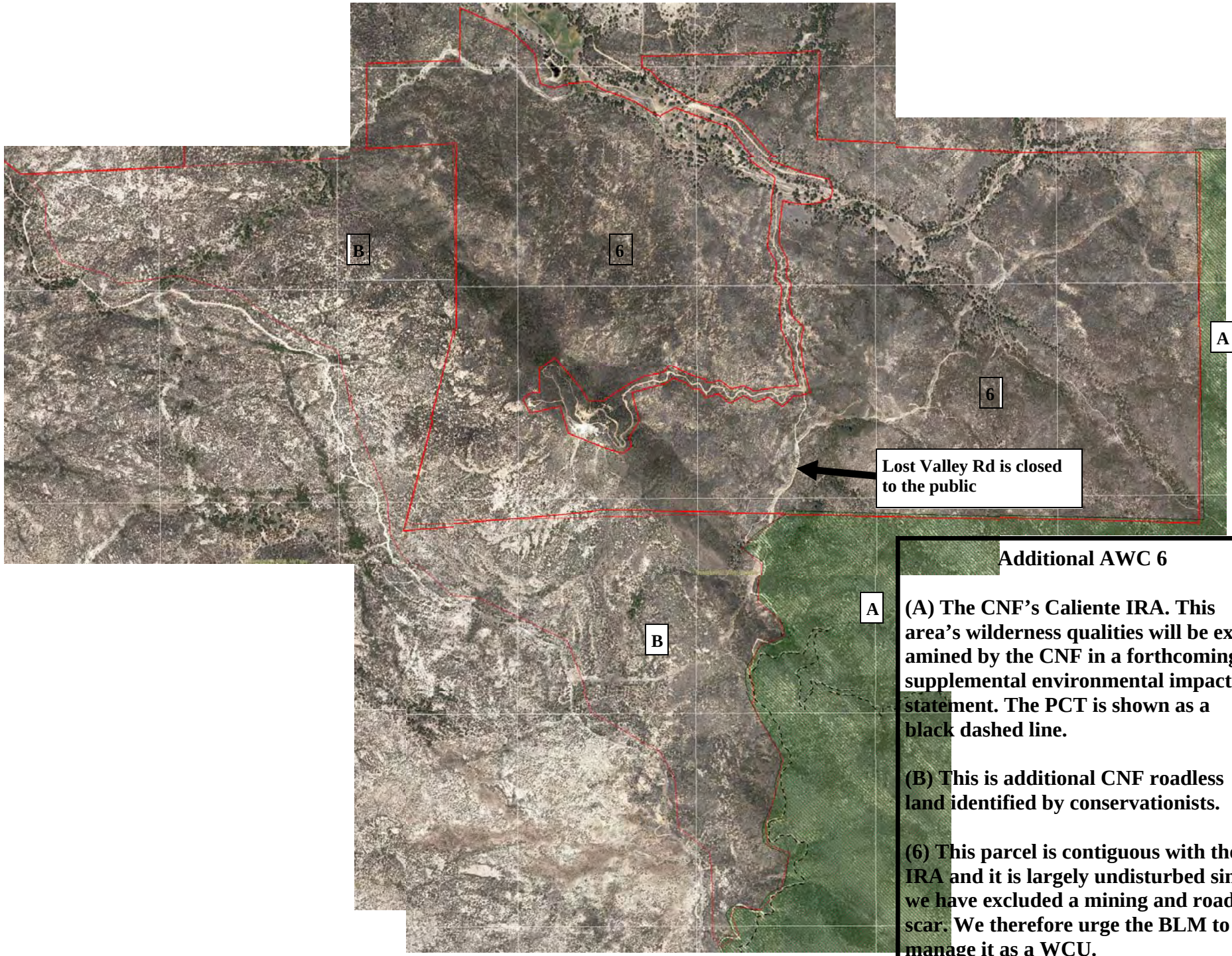
(3) Same as above, except that there is only one route.

(4) This parcel is contiguous with the WSA and with WCU 7 and it is largely undisturbed. We therefore urge the BLM to manage it as a WCU.



Additional AWC 5

This area is adjacent to the Hauser Mountain WSA and WCUs 7-9. The AWC is undisturbed except for two vehicle routes, both of which enter WCU 7. If these routes are indeed closed, there is no reason to not manage this parcel as a WCU. This would benefit recreationists using the PCT that passes through the AWC.

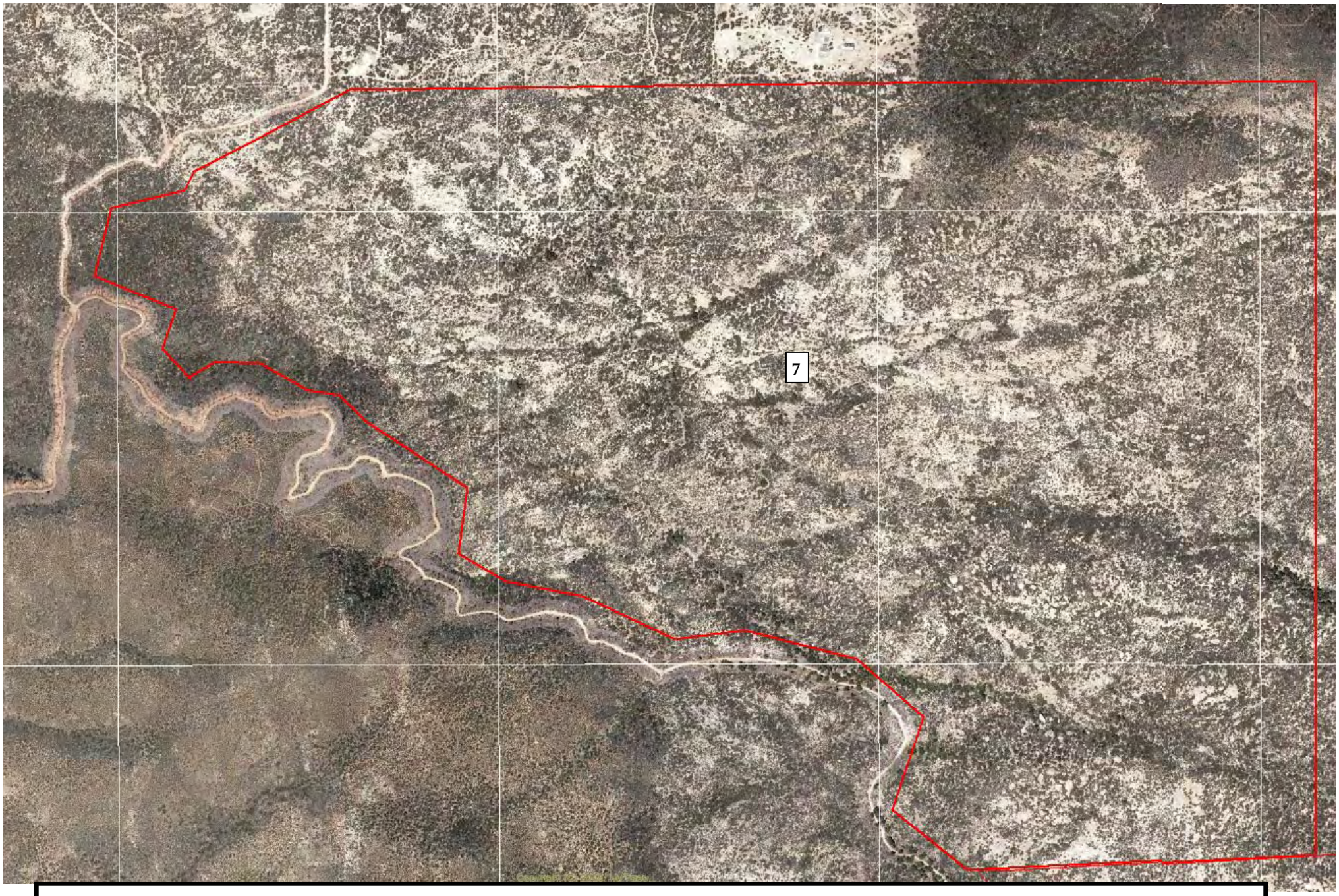


Additional AWC 6

(A) The CNF's Caliente IRA. This area's wilderness qualities will be examined by the CNF in a forthcoming supplemental environmental impact statement. The PCT is shown as a black dashed line.

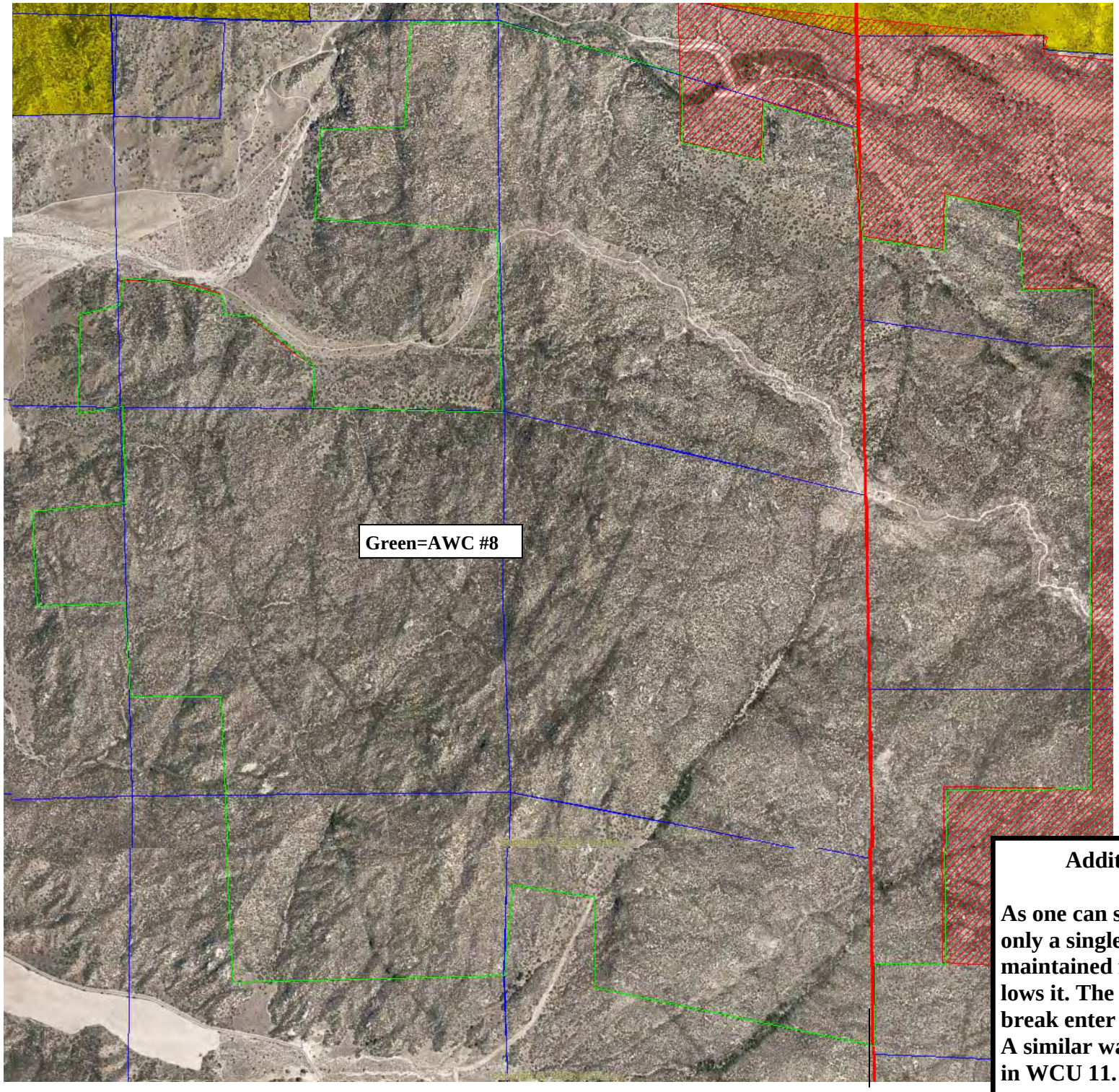
(B) This is additional CNF roadless land identified by conservationists.

(6) This parcel is contiguous with the IRA and it is largely undisturbed since we have excluded a mining and road scar. We therefore urge the BLM to manage it as a WCU.



Additional AWC #7

As one can see, this area, which borders roadless CNF lands on the south, is trackless. In fact, it is less disturbed than the three BLM WCUs identified on the northern boundary of the Hauser Mountain WSA. We therefore urge the BLM to manage it as a WCU.



Additional AWC #8

As one can see, this area includes only a single 2.8-mile way and a maintained fuelbreak that follows it. The same way and fuelbreak enter WCU 10 to the east. A similar way and fuelbreak are in WCU 11.

STATE OF CALIFORNIA–THE NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., *Governor*

SANTA MONICA MOUNTAINS CONSERVANCY
RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207
WWW.SMMC.CA.GOV

December 5, 2011

Mr. Greg Hill, RMP Team Lead
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, California 92262

Draft South Coast Resource Management Plan and Environmental Impact Statement

Dear Mr. Hill:

The Santa Monica Mountains Conservancy (Conservancy) is the State agency responsible for open space planning in the Rim of the Valley Corridor, which includes portions of the South Coast Resource Management Plan (RMP) area in Los Angeles County. The Conservancy supports the general thrust of the RMP update and looks forward to working with BLM to implement coordinated conservation efforts. The comments below relate to specific proposed activities within the Conservancy's jurisdiction.

The Conservancy strongly supports the RMP's proposed designation of Upper Santa Clara River BLM lands as an Area of Critical Environmental Concern (ACEC). These lands are included in the Angeles Linkage Conceptual Area Protection Plan (CAPP), a multi-jurisdictional conservation planning effort in the upper Santa Clara River watershed. The BLM currently owns 1,620 acres within the Angeles Linkage, forming a critical spine of protected land for ongoing conservation activity. The proposed ACEC designation will further these efforts by ensuring that BLM management is consistent with shared resource conservation objectives. Consistent with this designation, the RMP would enhance protection for visual resources in Soledad Canyon and withdraw these lands from surface entry mining.

The Conservancy further supports the RMP's general policies that protect riparian areas and oak woodland from disturbance. These habitats are increasingly rare in Southern California and contribute a disproportionate benefit to the region's biodiversity. The Conservancy encourages greater protection of coastal sage scrub habitat as well in the RMP. The RMP's proposed wildland fire management activities that respect ecological sensitivities are an improvement over current practices.

The Conservancy supports retention of BLM lands within regional habitat conservation plan areas and encourages collaborative management with local and State agencies. The Conservancy hopes that BLM will continue to be an active partner in the Angeles Linkage CAPP and leverage federal resources to advance regional conservation objectives, including acquisition of new lands. Lands within the CAPP and Santa Clara River watershed as a whole should only be disposed of through Protective Disposal to an appropriate local or State land management agency.

While BLM lands are mostly marked for retention under the draft RMP, the Conservancy urges that any lands the BLM intends to dispose of in the Santa Clara River watershed and the Conservancy Zone be first offered to conservation entities. The Conservancy requests that BLM recognize its statutory first right of refusal for all public land to be disposed of within the Conservancy's jurisdiction (California Public Resources Code §32646). This includes isolated parcels that BLM may find uneconomic to manage as federal land. The Conservancy's joint powers partners, the Mountains Recreation and Conservation Authority (MRCA) and Desert and Mountain Conservation Authority (DMCA), successfully manage such remote or discontiguous properties as part of a regional conservation strategy. The Conservancy, MRCA, and DMCA are willing to enter into any federal land disposal process that results in the permanent protection of open space in their respective jurisdictions (see attached map). The Conservancy and MRCA have particular interest in the BLM properties adjacent to the Santa Clarita Woodlands.

Lastly, as a minor point of correction, the BLM parcels noted on page 3-19 east of Interstate 5 are not located within the Santa Monica Mountains.

Thank you for the opportunity to review the draft RMP. If you have any questions, please contact Paul Edelman of our staff at (310) 589-3200, ext. 128.

Sincerely,

ANTONIO GONZALEZ
Chairperson

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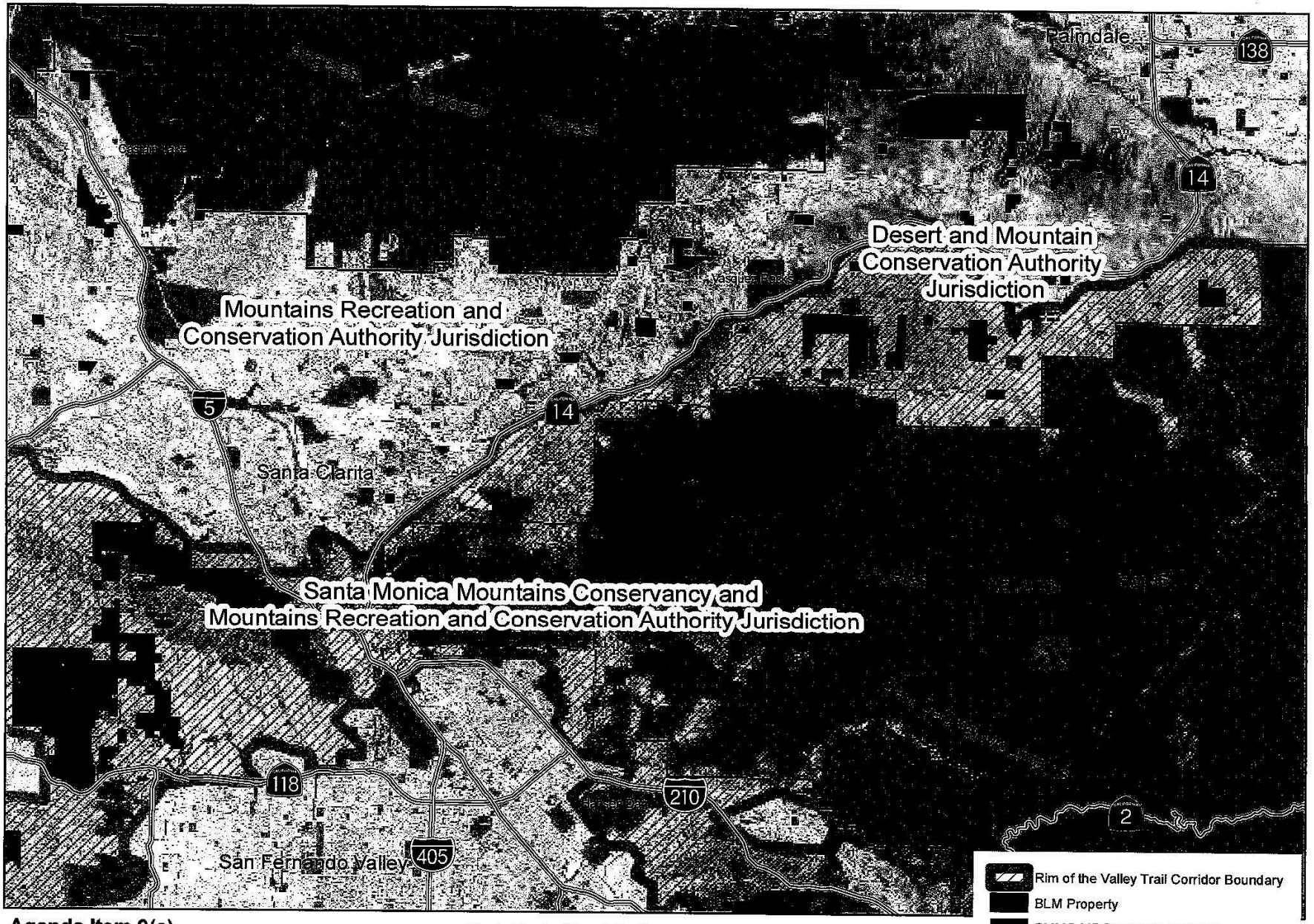

Agenda Item 9(c)
SMMC
12/5/11

0 2.5 5 Miles

Santa Monica Mountains Conservancy www.smmc.ca.gov
Mountains Recreation and Conservation Authority www.mrca.ca.gov
Desert and Mountain Conservation Authority www.dmca.ca.gov