

# Carrizo Plain National Monument RMP Scoping Summary

A Notice of Intent to prepare a Resource Management Plan for the Carrizo Plain National Monument was published in the Federal Register on April 24, 2002.

A notice announcing the time and location of three public Open Houses meetings was mailed to over 600 people on June 20, 2002. Open House meetings were held in Bakersfield, Carrisa Plains and San Luis Obispo. At each meeting, Monument Manager Marlene Braun gave a short presentation about the planning process for developing the RMP for the CPNM. Attendees were given an information packet containing information on web addresses, the NOI, the Presidential Proclamation establishing the Monument, background information on the CPNM, and an Executive Summary of the existing CPNA management plan. Attendees were asked to review the goals and objectives from the CPNA plan and offer comments on these or other issues. A public comment form was attached for attendees to provide comments by July 26, 2002. A list of attendees for each meeting is shown below.

<b>Tuesday, July 9<sup>th</sup>; 6 pm to 8 pm</b>	
<b>Bakersfield Field Office Conference Room</b>	
<b><i>BLM Personnel</i></b>	
Name	Position
Ron Fellows	Field Office Manager
Marlene Braun	CPNM Manager
Johna Hurl	CPNM Assistant Manager
Larry Mercer	Public Affairs Officer
Kathy Sharum	Wildlife Biologist
Saslaw Larry	Wildlife Biologist
Chris Ryan	Interdisciplinary Team Leader
Jeff Prude	Petroleum Engineer
Mike Ayers	Outdoor Recreation Planner
<b><i>Public Attendees</i></b>	
Name (organization, if applicable)	Town
Carl Twisselman II	McKittrick, CA
Ray Bilger	Tehachapi, CA
Garcy Garcia	Wasco, CA
Sandra Wieser	Onyx, CA
Jerry Erickson	Santa Ana, CA
James Leon, Chumash Council of Bakersfield	Bakersfield, CA
Jim Mitchell	Bakersfield, CA
Cindy and Kirk Brettschneider	Taft, CA
Joe Fontaine, Sierra Club	Tehachapi, CA
Marci Cunningham	Bakersfield, CA
David Dennis	Maricopa, CA
Bridget Escal	Bakersfield, CA
Vivian Canez	Bakersfield, CA
Mary and Jim Gordan	Lemon Cove, CA
Mike Gregerson, Channel 29 News	Bakersfield, CA
Total Public Attendance: 17	

Brief Summary of Discussion Items at the Bakersfield Meeting:

- Protection of cultural resources; cultural resource monitoring
- Oil and Gas Leases: how long are the leases, what happens when they expire
- The role of livestock grazing in habitat management; adaptive management
- Will access be decreased now that the area is a Monument
- Clarification on access for equestrians—on trails or allowed off-trail

<b>Wednesday, July 10<sup>th</sup>; 6 pm to 8 pm</b>	
<b>Carrisa Plains Elementary School, Carrisa Plains</b>	
<b><i>BLM Personnel</i></b>	
Name	Position
Marlene Braun	CPNM Manager
Johna Hurl	CPNM Assistant Manager
Kathy Sharum	Wildlife Biologist
Saslaw Larry	Wildlife Biologist
Chris Ryan	Interdisciplinary Team Leader
Jeff Prude	Petroleum Engineer
Karen Doran	Rangeland Management Specialist
Duane Christian	Archaeologist
<b><i>Representatives from Cooperating Agencies</i></b>	
Anne McMahon, The Nature Conservancy	San Luis Obispo, CA
<b><i>Public Attendees</i></b>	
Name (organization, if applicable)	Town
Cal French	Paso Robles, CA
David Dennis	Maricopa, CA
Melenie Ristow	Creston, CA
Warren Ristow, CDF	Paso Robles, CA
Jackie and Steve Czapla	Santa Margarita, CA
Bill and Maureen Vestal	California Valley, CA
Ann and Chad Chadwick	McKittrick, CA
Dale Kuhnle	Santa Margarita, CA
John Ruskovich	Santa Margarita, CA
Greg Beck	Santa Margarita, CA
Jodi Leslie	Santa Margarita, CA
Bob and Alberta Lewis	Santa Margarita, CA
Jerry Diefenderfer	California Valley, CA
Total Public Attendance: 17	

Brief Summary of Discussion Items at the Carrisa Plains Meeting:

- Question about whether local residents will have more input into process than people located farther away.
- Specific questions on Caliente WSA and whether it was in Senator Boxer’s bill (yes).
- CDF representative was inquiring as to whether there would be more prescribed fire use
- Question on emergency services if visitor use increases and if the County would pay for that

<b>Thursday, July 11<sup>th</sup>; 6 pm to 8 pm</b>	
<b>San Luis Obispo City Library</b>	
<b><i>BLM Personnel</i></b>	
Name	Position
Ron Fellows	Field Office Manager
Marlene Braun	CPNM Manager
Johna Hurl	CPNM Assistant Manager
Larry Mercer	Public Affairs Officer
Kathy Sharum	Wildlife Biologist
Saslaw Larry	Wildlife Biologist
Chris Ryan	Interdisciplinary Team Leader
Jeff Prude	Petroleum Engineer
Karen Doran	Rangeland Management Specialist
Duane Christian	Archaeologist
<b><i>Representatives from Cooperating Agencies</i></b>	
Anne McMahon, The Nature Conservancy	San Luis Obispo, CA
Bob Stafford, CA Dept. of Fish and Game	San Luis Obispo
<b><i>Public Attendees</i></b>	
Name (organization, if applicable)	Town
Enrico Bongio	San Luis Obispo
Vicki and David Stark	Atascadero, CA
John Edminsten	San Luis Obispo, CA
Pam Heatherington	San Luis Obispo, CA
Dawn Dunlap	Cambria, CA
Beth Van Valkenberger	Atascadero, CA
Bill Plummer	Atascadero, CA
David Dennis	Maricopa, CA
Pat Veesant	San Luis Obispo, CA
Anne Fairchild	San Luis Obispo, CA
Neil Havlik	San Luis Obispo, CA
Phil Compton	Templeton, CA
Tina and Jay Salter	Atascadero, CA
David Sneed, San Luis Tribune	San Luis Obispo, CA
Total Public Attendance: 16	

**Brief Summary of Discussion Items at the San Luis Obispo Meeting:**

- Historical use of water to irrigate at Bidart Ranch, leading to increased sheep grazing and overuse
- Request for a parking area off Hwy. 166 to allow walking access to Monument
- Are there control pastures that are ungrazed; general discussion of grazing management
- Some concern about grazing in mountain areas—more sensitive to disturbance
- Specific questions about federal grazing preference leases—asked if this RMP process would be the place to consider elimination of those leases

- Discussion of possible expansion of Monument boundary—expand into Temblor’s where there’s public land; wetland area north of Monument; Connect to Los Padres NF through Chimineas Ranch; Freeborn and Hubbard Hill areas
- Questions on OHV activity; extent of use
- Concerns about the nearby power plants being built and how they might affect the air quality at the Monument
- Questions about and concerns that Monument status may lead to more visitors and associated commercial activities such as concessionaires

## ISSUES SUMMARIZED FROM MEETINGS

Most discussion at the public meetings could be characterized as question and answer and supplying general information. Three areas of concern that could be listed as issues include:

1. Federal Grazing Preference permits: question of whether they belong in Monument if they are not serving any resource objectives; and concern over possible resource damage
2. General issue about not losing access with Monument designation.
3. Concern over effects to local communities from increased visitation and whether the Monument can handle increased visitation

## PUBLIC COMMENTS RECEIVED

Respondent (Organization if applicable)	Respondent Number
Marci Cunningham	R-1
Jim Mitchell	R-2
Cal French and Jessica Hodge, Sierra Club	R-3
Vicky Hoover, chair, Sierra Club CA/NV Regional Wilderness Committee	R-4
Mike Painter, Californians for Western Wilderness	R-5
Pam Heatherington, Director, Environmental Center of San Luis Obispo County (ECOSLO)	R-6
Jason Swartz, Conservation Associate, California Wilderness Coalition	R-7

## GENERAL COMMENTS *(BLM response is shown in italics)*

1. I agree with the Mission Statement, but as always, the devil is in the details. (R-2)

The Carrizo Plain should continue to be managed and maintained in a primitive state and in accordance with the Mission Statement in the CPNA Management Plan. (R-6)

Overall, we approve of the "Mission Statement" and "Vision" in the present Management Plan, and are happy to see them be the basis for an upgraded RMP. (R-5)

*The current Mission Statement and Vision will be carried forward into the new RMP.*

2. We approve of the existing Mission Statement and Vision for the Carrizo Plain Natural Area and would like to see that they be used for the CPNM RMP. The mission must include the BLM's mandate to protect the objects and resources outlined in the proclamation. The mission should mirror the proclamation, which states "the Carrizo Plain National Monument is the largest undeveloped remnant of this ecosystem, providing crucial habitat for the long-term conservation of the many endemic plant and animal species that still inhabit the area." One of the monuments goals should be to protect the remote and undeveloped character of the landscape, which is one of the values stated in the proclamation and essential to protecting the scientific and historic resources. (R-3)

*We agree with the need to protect the objects and resources outlined in the proclamation. The RMP will include goals and objectives for visual resource management, including retention of the remote and undeveloped character that you mention.*

3. Since the BLM has already worked on a management plan for the Carrizo Plains, from before the designation of the area as a national monument, it seems likely that much of that pre-existing plan can be incorporated into the present planning. (R-4)

*We agree; the current management plan will provide the foundation for the new RMP.*

4. Let me express my general hope and optimism that the BLM's key role in the National Landscape Conservation System, (NLCS) "a core system of specially protected and managed federal lands", can lead to a new public image of the BLM -- too long considered by many (if they knew about the agency at all) as a caretaker of the "lands no one wanted" or those to be exploited and disposed of. The Bureau has lost some lands to other agencies in the recent past, but its integral involvement in the new national monuments has the potential not only to bring it additional funding but to give it a new relevance and vitality in the stewardship of America's federal lands.

However, it is clear that this growth can occur only if the BLM lives up to its responsibilities for high quality stewardship of the new national monuments. It won't be easy; local pressures for exploitation will surely be strong. If the BLM can steer a straight path toward stewardship and avoid the pitfalls, I think the agency can be a model land manager in the 21st century. Otherwise, I fear a fading of relevance -- more lands assigned to other agencies, less of a role for the BLM and less funding. This current management plan for the Carrizo Plain National Monument is one way in which a determined BLM can show its readiness for its new 21st century role. I look forward to being involved in continuing stages of the management planning process. Thank you for helping preserve the integrity of America's priceless public lands. (R-4)

*We are also excited about participating in the National Landscape Conservation System and share your optimism of BLM's role.*

5. We recommend that the planning process be made much more visible on the Monument's Internet web site. This will make meaningful public participation easier. (R-5)

*Thank you for the suggestion. We have added a planning update page with links to other pertinent planning documents.*

6. Such an amazing place as the Carrizo Plain deserves the maximum protection that can reasonably be provided. We place the utmost importance on large unroaded areas for protecting biological diversity. As the last true stronghold for many San Joaquin Valley species, the Carrizo Plain National Monument offers an outstanding opportunity to plan for a truly miraculous national treasure that fulfills a vision of natural splendor in the realm of geology, ecology and archaeology. (R-7)

*Thank you for your comment. We agree that careful management of the CPNM will provide the opportunities you mention.*

## **NEPA AND PLANNING PROCESS**

7. At the meeting in San Luis Obispo, BLM staff seemed to be saying that both the existing Carrizo Plain Natural Area Management Plan and the Caliente RMP were open to revision in this process. At that meeting, I was led to believe that this planning process opens the possibility for the public (and industry) to suggest revisions to the *entire* Caliente RMP, not just those sections pertaining to the Carrizo Plain. This seems to conflict with the notice in the Federal Register which appears to confine the public process to the creation of the RMP for the Carrizo Plain National Monument and to amendments of those sections of the Caliente RMP that pertain to the Carrizo Plain. Which is it?

It is our opinion that there is no need to revise the Caliente RMP, except those sections pertaining to the Carrizo Plain N.M. The Caliente RMP was just completed in 1997 and the life of a BLM RMP is supposed to be 20 years. Opening the entire Caliente RMP to revision seems like an unnecessary taxpayer expense and somewhat of an insult to the folks who participated in its creation just 5 years ago. We do not see the nexus between the creation of a new National Monument on the Carrizo Plain and the need to revise the entire Caliente RMP. Could you please explain how this decision came to be? (R-6)

*We apologize for any confusion regarding the scope of the planning effort. We are not revising the Caliente RMP. We are required to develop a new stand-alone RMP for the new CPNM. In doing so, we are required to amend the Caliente RMP and withdraw pertinent Carrizo Plain references. This amendment process in no way opens the entire Caliente RMP to complete revision. We agree that this is not necessary and that the Caliente RMP continues to provide sound management guidance for the management area. Only those sections pertaining to the Carrizo Plain are open for revision. The amendment process simply amends the Caliente RMP for the one issue at hand, the development of the new Carrizo RMP. Therefore, your interpretation of the federal register notice is correct in this manner.*

8. We have similar concerns about the existing Carrizo Natural Area Management Plan (CPNAMP). This document was just completed in 1996 after an extensive public process. Again, why is there a need for revision? It seems that the simple solution would be to change the title of the existing management plan to reflect the new monument Status, make whatever changes that monument Status requires, and amend the Caliente RMP to reflect those changes. We would suggest confining the public process to this and nothing more. This is exactly what the notice in the Federal Register suggests, but this is not what we heard at the meeting on July 11th in San Luis

Obispo. Perhaps this project needs to be re-noticed in the Federal Register to reflect what the public is now being told. (R-6)

*We feel that the new Carrizo RMP Planning effort does afford us the opportunity to both update the existing management plan for the Natural Area, which now is over 6 years old, and to include any new issues or planning guidance that is proposed during our planning process. We welcome any comments that the public has on our existing plan and will seek further comments when the draft plan is available this spring.*

9. You are proposing to comply with NEPA with a single Environmental Assessment. We would like to remind you that if any changes are considered, to either the CPNAMP or to the Caliente RMP, which could result in significant impacts to the environment, an EA will not be adequate for this project and NEPA requires you to do an Environmental Impact Statement (EIS). Given the large number of endangered species on the Carrizo and the sensitive nature of the area, it would not take much of a change to trigger this requirement. This is another reason why limiting the scope of this project makes sense. (R-6)

*At this point in the analysis, we feel that an environmental assessment will adequately address the potential impacts of the proposed action and any alternatives for the development of a new RMP for the Monument, and for the amendment of the Caliente RMP. We agree with your observation that there are not likely to be significant effects caused from updating the existing Carrizo Plain Natural Area Management Plan and amending the Caliente RMP for this effort.*

10. We are puzzled as to the need for the new advisory committee being created to advise you in this process. Doesn't the BLM already have a standing Resource Advisory Committee? What do they do? Is the process you envision so complicated as to require *two* advisory committees? This seems like an awful lot of advisory committees for a few simple changes to an existing (up-to-date) Management Plan. (R-6)

*When the Carrizo Plain Natural Area was designated a National Monument by former President Clinton, the Department of the Interior required our office to not only develop a new Carrizo RMP, but to also formulate a new Advisory Council for the Monument. We view this opportunity to have a resource advisory council devoted solely to the Monument as another valuable resource to assist us with complex management issues on the Monument.*

11. Why is there no environmental representation on this new committee? It would seem that in an area as biologically rich and sensitive as the Carrizo, protecting the environment would be a top priority. Certainly the CPNAMP seems to indicate as much. Are we wrong to assume this? We strongly recommend environmental representation on this new committee. (R-6)

*As directed by Washington, there will be nine members on this new Carrizo Plain Advisory Council, with five positions set aside for specific areas. These five positions include two members chosen from county government (one supervisor each from San Luis Obispo and Kern County), one member chosen from our Carrizo Plain Native American Advisory Council, one member chosen from our current Central California RAC, and one member chosen from our current grazing permittees on the Monument. In addition, four additional "open" positions will be filled. We had over 26 nominations in response to our outreach efforts through public mailings and press releases. Nominations have been forwarded to the*

*Washington Office for selection. When we receive the selections, we will announce them in local news media.*

## ACCESS

12. I enjoy riding my horses on the many trails all over the eastern portion of the monument. These existing trails traverse the ridges and connect the canyons and other areas. I certainly don't want equestrians or hikers to lose access to these trails just because they are not listed as "established trails" on a map. I would like to see that the wording used to describe the trails, include all of the existing trails, not just a few "established trails." (R-1)

Hiking, Biking, Horseback Riding: (from page 26 of "Special Values of the Carrizo Plain"). This paragraph indicates there are four established hiking trails on the CPNM. I am not sure of the definition of established trails, but there are many more trails than the four small ones indicated here. I commonly use existing trails up over the ridges connecting Quail Canyon to Lawson Springs and other areas. My experience mostly deals with just the eastern portions of the monument and my concern is that "established trails" soon becomes a method to limit travel, as everything else is not "designated." The web of animal, Indian, and hunting trails weaves a wonderful experience that should not be lost. (R-2)

Off-trail access: I did not see this addressed but I would like to see off-trail access addressed in the RMP. Currently off-trail access is allowed for hikers, hunters and equestrians. I would like to see this stated for future users. (R-2)

*We agree that off-trail access for hikers, hunters and equestrians needs to be clarified in the new plan. Non-motorized and non-mechanized use (hiking and equestrian use) is allowed off of designated trails and roads. Mechanized equipment, such as bikes, are allowed on all open roads; roads categorized as administrative use (unless otherwise posted) and designated trails. Automobiles are allowed only on open roads and OHVs are allowed on open roads and designated trails.*

13. I have to admit that I am concerned with the future of public access to the Carrizo Plain due to its new national monument status. Mission statements often sound nice, but when they are put into practice the public sometimes loses access to public lands. (R-1)

*The BLMs Proposed Action will not further restrict current access routes, (as shown in the Carrizo Plain Natural Area Plan, Appendix H).*

14. Continued access to recreational use needs to be one of the main goals of any management plan for the CPNM. This access needs to include adequate parking to accommodate horse trailers and other recreational vehicles. Adequate parking areas for large horse trailers, RV's and day hikers need to be allowed within the monument. (R-1, R-2)

*We agree that access is necessary for enjoyment of the Monument's resources, with necessary provisions to protect sensitive resources. Providing appropriate access will be one of the management goals in the new RMP.*

15. Mountain Bike Access: The maps provided at the meeting only shows about 10% of the roads that actually exist in the CPNM at this time. There was one map only on display that showed a

much larger web of roads, however, even this map did not show all the roads currently in use. It is my concern that access will be denied based on these inaccurate maps and slowly all the existing roads will be indicated as unauthorized roads and will be closed. I believe following the mission statement of “maintaining opportunities for compatible...social and recreational activities’ should include the web of existing roads emphasizing loop roads and trails where possible. (R-2)

*The road inventory and designations shown in Appendix H include all of the designated roads on public lands to our knowledge. The BLM does not have jurisdiction of any roads on private land, and inventory of these roads may be lacking due to access issues—which may account for some of the roads you mention that are not included on maps.*

16. Existing roads should remain unpaved and new roads should not be built. (R-6)

*We do not anticipate proposing paving of existing roads or construction of any new roads at this time. If these became proposals at some time in the future, site specific NEPA analysis would be required.*

## **BOTANY**

17. The new plan provides an opportunity to achieve a detailed inventory of native plant species in the monument. I understand that botanists on a Calif. Native Plant Society (CNPS) field trip to Caliente Mountain in May discovered several more species of native plants that were not previously known to exist in the Monument. (R-4)

*We agree that preparation of a new plan allows us the opportunity to update existing resource information. We look forward to reviewing the recent CNPS discoveries.*

## **CULTURAL RESOURCES**

18. Historic Resources: I have not seen any reference to the lookout on Caliente Mountain as an important historic site. I believe this is the last remaining lookout from the hurried construction during WWII. This lookout was manned by people awaiting an attack on California and involved hardships largely forgotten. In your files should be a letter from me 10 years ago giving the name and phone number of probably one of the last remaining people that served on that mountain. She manned that station with her very young children and was resupplied by mule from the Carrizo side. Hopefully her story was recorded. The lookout was still standing, although barely the last time I looked at it. I believe immediate work is necessary to keep it from being lost. (R-2)

*This lookout is located on land owned by the State Lands Commission and is therefore outside the jurisdiction of the BLM. This parcel may be considered for acquisition in the future, as we agree this is an important historical resource.*

## **FIRE MANAGEMENT**

19. BLM should develop a comprehensive fire management program for the Monument. (R-3)

*The BLM completed a phase one Fire Management Plan for the Bakersfield Field Office in 1998, which included the Carrizo Plain Area. Information from this plan, and any associated updates, will be included within the new RMP.*

## **HABITAT MANAGEMENT TOOLS**

20. Unless it can be shown by independent scientific review that cattle grazing as now practiced on the Monument is meeting the Mission, Vision, and Goals, it should be phased out or redirected so that it meets the specified criteria. Research on grazing in the Monument needs to be published and subject to review, and greater efforts to secure funds for scientific study of grazing need to be made. (R-3)

Cattle grazing, which has been permitted, but which will need to be looked at anew. Limited grazing, with a view toward control of some exotic species, may work, if directly carefully toward the goal of restoring native ecosystems -- and if controlled experiments, by independent academic researchers, are rigorously made to test the assumptions on which prescriptive grazing has been based. This topic must be dealt with in depth in the new plan. A thorough monitoring program of any grazing regime should be instituted at once. (R-4)

We understand that cattle grazing and its related infrastructure are currently a part of the Carrizo Plain management plan. We would expect BLM to continue scientific analysis of the impacts that this use has on the biodiversity of the monument. We would expect that the new Monument management plan would reduce to a minimum the level of roads and related grazing maintenance structures in order to protect the values and objects for which the Monument was proclaimed. The presidential proclamation for the Carrizo Plain National Monument states that "The Secretary of the Interior shall prepare a management plan that addresses the actions, including road closures or travel restrictions, necessary to protect the objects identified in this proclamation." President Clinton defined such objects in his remarks on January 17, 2001: "The monument offers a refuge for endangered, threatened, and rare animal species," "The area is also home to many rare and sensitive plant species", are a few of the statements offered by the President regarding the "objects" of the Monument. (R-7)

*The BLM is committed to continue analyzing data collected from the grazing research program. The adaptive management system proposed by the BLM will allow for flexibility in the use of grazing as a habitat management tool on the CPNM. We agree that monitoring is an essential part of the adaptive management system.*

21. We would like to see grazing eventually phased out of the Monument, and see enlargement of the pronghorn antelope and tule elk herds take the place of the departing cattle. If grazing is reduced, associated fencing should be removed as well, and as soon as possible. If scientific studies are needed on grazing effects in the Monument before reducing grazing, they should be undertaken with all deliberate speed. Until that time, special efforts should be taken to protect sensitive monument resources-such as springs or endangered plants-from the deleterious effects of grazing. (R-5)

Further efforts to increase herds of pronghorn and tule elk should be made, with the objective of determining whether or not such herds can be more effective than cattle (or at least as effective) in reducing noxious weeds and in restoration of native species. Pronghorn are apparently unable to cope successfully with fencing used to control cattle. Research is needed to determine how fencing might be eliminated or changed so as to reduce impact on pronghorn herds. Thus, we approve of the statement: "The ultimate long-term vision is to decrease livestock use while increasing the role that native elk and pronghorn play in maintaining natural communities," included in the BLM "Information Packet" distributed in July 2002. (R-3)

*One of our managing partners, California Department of Fish and Game, is currently working with the California Department of Transportation on a mitigation project to make the fences in the CPNM more antelope friendly. This project will replace the bottom strand of wire with smooth wire; ensure the proper height of the bottom wire to allow easier access for the antelope; and remove any fences that are no longer needed. The BLM is working closely with the California Department of Fish and Game to design management practices that will benefit the native ungulates. The results of the current grazing research project and monitoring over time will be used within the proposed adaptive management system to make and adapt management decisions as we learn more about these ecosystems.*

## **LANDS**

22. There should be a mechanism in the new RMP that would allow for new lands adjacent to or within the Monument that are acquired by The Nature Conservancy, the State, or by BLM to be easily added to the Monument. (R-6)

*The Monument boundary was established through Presidential Proclamation and therefore cannot be changed without an equivalent level of action. The Proclamation already provides for the automatic addition of any lands acquired within the boundary when it states: "Lands and interests in lands within the proposed monument not owned by the United States shall be reserved as a part of the monument upon acquisition of title thereto by the United States."*

## **MINERALS**

23. New consideration will need to be included in the RMP for oil and gas exploration, which I believe are specifically prohibited in the monument proclamation (R-4).

The proclamation withdrew the monument from entry, sale, location, selection, or leasing under the public lands laws including mining, mineral, and geothermal leasing. The RMP should be written to carry out those orders. (R-3)

*You are correct that management of mineral resources is one of the areas that did change following designation as a National Monument. These new provisions will be included in the new RMP.*

24. Mineral development of all types should be vigorously discouraged. (R-6)

*The Proclamation withdrew the monument from any new mineral or geothermal leasing, with the exception of valid existing rights. When Federal lands are impacted by proposals to develop private minerals, the impacts will be subject to review using existing NEPA processes, including, but not limited to, development of stipulations, conditions of approval, and mitigation/compensation requirements. The BLM will cooperate with State, County, and other local agencies to ensure that the mission and purpose of the CPNM is furthered and only reasonable uses of public lands may be made to access and develop private mineral estate.*

25. For any claims that predate the Monument, the BLM should address how these will be handled and a validity examination should be performed before a claimant conducts surface disturbances.

*There were no valid claims or other valid existing rights for any solid minerals as of the date of the Proclamation.*

26. In acquiring any future private parcels from willing sellers, the BLM should purchase all the rights including those oil, gas, and mineral rights whenever possible. (R-3)

The Presidential Proclamation of January 17, 2001 creating the Monument stated: "The establishment of this monument is subject to valid existing leases." A study should be undertaken to determine the costs associated with the buying-out of existing mineral leases (if any) in the Monument, be they for oil and gas, solid, locatable, solid leasable, or salable minerals, as discussed in Sec. II.E. of the current Management Plan. Included in that study should be the feasibility of directional drilling from outside Monument boundaries into oil or gas fields which might underlie the Monument, should a buyout not be practical or desirable. (R-5)

*Due to the large number of acres of private mineral estate (over 100,000 acres) and the multiple owners, it is not feasible to acquire all of these rights. Proposals for the acquisition of private mineral estate would be considered on a case-by-case basis. Directional drilling is only effective for approximately ½ mile, so its use in much of the private mineral estate would not be practical.*

## **RECREATION AND INTERPRETATION**

27. To protect the remote and undeveloped character of the CPNM, visitor facilities should be developed whenever possible in surrounding communities. BLM should not allow lodging or commercial campgrounds to be built within the monument. This helps build ownership within these communities for long-term protection and create economic opportunities. (R-3)

*We agree that the sensitive resources in the CPNM do not allow for large expansion of visitor facilities within the monument and agree that these types of facilities would be better suited to development outside of the Monument.*

28. Consistent with the Mission, Vision, and Goals, further efforts should be made to educate the public about the unique features of the Monument while at the same time protecting habitat for threatened, endangered, and sensitive species. (R-3)

*We agree that this remains an important management goal for the new RMP.*

29. The emphasis in visitor education should be on the natural resources of the Monument, and the enjoyment of them. But interpretive sites and signs should be kept to a minimum. We recommend publishing a comprehensive brochure or small booklet to contain the information that might otherwise be on interpretive signs spread throughout the Monument. Such signs contribute to visual clutter and would detract from the open beauty and naturalness of the Plain. (R-5)

*We agree that these are important considerations. Monument staff members are preparing both a sign plan and an interpretive prospectus to address these important management issues.*

30. The suitability of "guzzlers" as a method for augmenting quantities of game needs to be addressed. These may have to be looked at on a case-by-case basis. Having more game for hunters may not always, or even generally, be a desirable goal, especially when weighed against the negative effect on naturalness and encouragement of road-related impacts. (R-4)

*Guzzlers benefit both game and non-game animals. We agree that proposals for water improvements must be examined on a case-by-case basis.*

31. Commercial activities like private concessions, helicopter landings, etc should be prohibited within the Monument. Large group tours should require a permit. (R-6)

*There are no plans to promote private concessions, or helicopter landings. Organized groups of 20 or more persons, or 5 or more vehicles must secure a permit for any day or overnight use.*

## **WATERSHED**

32. Springs at the base of the Caliente Range need to be protected from cattle intrusion and from intrusion of exotic plants. (R-3)

*Management goals include protection of springs, and areas will be protected from livestock where necessary. Areas will be monitored for invasions of exotic species and control measures will be implemented where necessary.*

33. BLM should ensure that all land management practices protect quantity and quality of water resources. (R-3)

*We agree and this is a management goal, as well as an important consideration in the rangeland standards for health and guidelines for management.*

## **WILDLIFE**

34. Threatened, endangered and sensitive species should continue to receive full protection. As part of that protection the Endangered Species Act (ESA), the BLM is obligated to Conserve listed

species. The RMP needs to outline species recovery plans and designate critical habitat. Visitation and other uses should be limited in areas to prevent detrimental impacts to the recovery of these species. (R-3)

*The BLM will follow all requirements under the ESA for protection of listed species. The BLM consults with the US Fish and Wildlife Service to implement provisions of the ESA.*

## **WILDERNESS**

35. Potential Wilderness: the 17,000-acre Caliente Mountains Wilderness Study Area must even more rigorously be managed as if it were wilderness. Now included in Senator Boxer's California Wild Heritage Act, S. 2535, presently before Congress, the wilderness proposal for the area should be recognized and respected by the managing agency. (R-4)

The Caliente Wilderness Study area, which is part of legislation introduced in the U.S. Congress for designation under the 1964 Wilderness Act, should continue to be managed as wilderness until the legislation passes. (R-5)

*Wilderness Study Areas (WSAs), such as the Caliente Mountain Wilderness Study Area located within the CPNM, are managed under the BLM's Interim Management Policy and Guidelines for Lands Under Wilderness Review (BLM Manual H-8550-1). The Caliente Mountain WSA will continue to be managed under these guidelines until action is taken by Congress.*

36. The Monument should make a complete update of its wilderness inventory, covering all lands in the Monument. Lands it finds with wilderness character should be managed as WSAs. (R-5)

According to FLPMA, the BLM must prepare and maintain on a continuing basis an inventory of wilderness values. The Caliente Mountain Wilderness Study Area should continue to be managed to prevent impairment of its wilderness values. We are supporting recently introduced legislation in Congress to make this WSA a Federal Wilderness. If this legislation becomes law, the land owned by the State of California at the summit of Caliente Mountain should be acquired and incorporated into the Wilderness. (R-3)

With this letter and accompanying documents, we request that the BLM conduct a wilderness inventory for certain lands within the Carrizo Plain National Monument. Enclosed you will find a description of the areas we are requesting BLM to initiate a wilderness inventory of, as per the BLM *Wilderness Inventory and Study procedures* handbook (H-6310-1).

The Federal Lands Policy and Management act handbook states that the BLM shall “prepare and maintain on a continuing basis an inventory of all public lands and their resources and other values (including but not limited to outdoor recreation and scenic values), giving priority to areas of critical environmental concern.” Furthermore the *Wilderness Inventory and Study Procedures* (WISP) handbook provides the guidelines for the BLM to carry out these requirements. One of these guidelines is that the BLM shall consider requests from the public that identify lands that have wilderness characteristics.

Based on our recent fieldwork we have inventoried five roadless units that have not been considered previously for study as having wilderness character (See attached map). These units all fulfill the requirement that units be over 5,000 acres in size. A sixth unit identified is an expansion of the current Caliente Mountain WSA. We believe the documentation of these areas will provide credible new information to the BLM as to their wilderness character.

Some of these identified units will not be immediately recognizable as having wilderness character, if one relies on existing road maps. But our recent fieldwork identified a number of routes shown on maps of the area which are not roads at all – some are nonexistent, some are simple two-tracks that go nowhere, some are old tracks reclaimed by vegetation, etc. The WISP defines a roadless area by “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 a vehicle does not constitute a road.” It is our opinion that many routes within the Monument are not truly roads, and that the road inventory in the Carrizo Plain Natural Area Plan includes many closed, revegetated, or redundant routes.

### **Carrizo Plain NM Roadless Areas proposed for wilderness inventory:**

Soda Lake unit- Encompassing roughly 10,500 acres, this area represents a valley ecosystem typically underrepresented in the Wilderness system. This large unroaded area presents a prime opportunity to ensure protection for an important area within the Carrizo Plain.

Temblor unit- This approximately 11,800 acre roadless area has gone uninventoried by the BLM. It is a vast area stretching from the Elkhorn Plain to the crest of the Temblor Mountains. The scenic quality of this area’s outcrops and valleys and vistas stretching toward the Elkhorn Scarp and the Caliente Range are quite breathtaking.

Caliente Mountain WSA expansion- We have identified approximately 15,000 acres of roadless acreage outside the boundaries of the proposed Caliente Mountain Wilderness in the California Wild Heritage Act of 2002. The Caliente Range provides elevational diversity for many species that migrate daily from the valley to the mountains.

Panorama unit- This nearly 5,200-acre parcel abuts the Soda Lake unit and provides additional unroaded acreage for species dependent on the valley ecosystem.

San Andreas unit- The San Andreas unit comprises roughly 5,500 acres within the heart of the Carrizo Plain. Wrapped within a historical grazing stronghold, this unit provides a large, relatively untouched area for native grazers such as the Pronghorn Antelope, and Tule Elk to forage. This roadless unit could be expanded greatly with the acquisition of adjacent private lands.

Elkhorn unit- This unit encompasses approximately 5,700 acres on the geologically unique Elkhorn Scarp. As a further example of the largely underrepresented plains ecosystem, this unit provides additional roadless acreage for the maintenance of native biodiversity. (R-7)

In addition to wilderness inventories, we would like to ensure that BLM conduct inventories of all roadless areas within the monument so that they will remain roadless on into the future – particularly those parcels located in the plain. These areas may require some active restoration, and will need protective management considerations to remain unroaded. In these low-lying areas with a history of ranching use, the “road” definition becomes especially pertinent as we analyze the WISP declaration of the possibility of an area returning to a natural condition. The WISP states that any portion of an inventoried area “in which human imprints are substantially noticeable, but which otherwise contains wilderness characteristics, may be further considered for designation as a WSA when it is reasonable to expect that human imprints will return or can be returned to a substantially unnoticeable level either by natural processes or by hand labor.” We encourage BLM to close and restore to an unnoticeable level many of these “routes to nowhere” that presently mar portions of the roadless areas in the Plain itself. (R-7)

*Per FLPMA Section 202 requirements, a wilderness inventory will be completed on lands within the Monument, including the areas proposed in the comments above. Results of these inventories will be included in the Draft RMP.*