

1 IGNACIA S. MORENO  
Assistant Attorney General  
2 Environment & Natural Resources Division

3 CHARLES R. SHOCKEY, Attorney  
4 D.C. Bar No. 914879  
Natural Resources Section  
5 Sacramento Field Office  
Environment and Natural Resources Division  
6 United States Department of Justice  
501 "I" Street, Suite 9-700  
7 Sacramento, CA 95814-2322  
8 Telephone: (916) 930-2203  
Facsimile: (916) 930-2210  
9 Email: [charles.shockey@usdoj.gov](mailto:charles.shockey@usdoj.gov)

10 Attorneys for Federal Defendants

11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**  
13 **SAN FRANCISCO DIVISION**  
14

15 CENTER FOR BIOLOGICAL DIVERSITY, <i>et al.</i> , ) 16 Plaintiffs, ) 17 v. ) 18 U.S. BUREAU OF LAND MANAGEMENT, <i>et al.</i> , ) Federal Defendants, and ) 19 ) 20 KERN COUNTY, CALIFORNIA, <i>et al.</i> , ) Intervenor-Defendants. ) 21 )	Case No. 3:06 CV-04884 SI  FEDERAL DEFENDANTS' NOTICE OF FILING OF SIGN IMPLEMENTATION PLAN
--	---

22 The federal defendants, U.S. Bureau of Land Management (BLM), *et al.*, file this notice  
23 of filing and the BLM's "Sign Implementation Strategy, West Mojave Planning Area, Barstow/  
24 Ridgecrest Field Offices" (Signing Plan), attached as Appendix A. BLM submits this notice and  
25 the Signing Plan to comply with the court's January 29, 2011, Order Re: Remedy, which states  
26 that, "[w]ithin 60 days of this order, the BLM should provide the Court with a detailed  
27 implementation plan for signing all open routes in the WEMO." Doc. 243 at 14.

28 The BLM Signing Plan "addresses the remedy timeline, the scope of the signing to be  
done, the process that is used including overall priorities and specific strategies for each of the

1 field offices affected by the order.” Appendix A, Signing Plan at 3. The plan provides a brief  
2 background for the court order and describes prior signing efforts in the West Mojave (WEMO)  
3 Planning Area. *Id.* The plan also provides a timeline, including the deadlines for submission of a  
4 monitoring plan, quarterly report, completion of signing, and updating of maps. *Id.* at 4. BLM  
5 identifies the components included in the plan, including setting priorities, developing a process,  
6 staffing, training, supplies and equipment, and funding. *Id.* at 5.

7 With regard to priorities for signing activity, BLM notes that court has ordered a different  
8 time frame from the one set forth in the WEMO Plan, then identifies the members of the inter-  
9 disciplinary team of BLM employees who have been assembled to implement the signing effort  
10 under the court order. Team members include a biologist, archeologist, park ranger, recreation  
11 and wilderness branch chief, and geographic information system (GIS) specialist. *Id.* at 6. The  
12 plan describes the types of information that the teams must consider in determining appropriate  
13 priorities for conducting the signing effort, including resource values, access, proximity to urban  
14 areas, and availability of existing data. *Id.* As BLM notes, the teams assigned values to the data,  
15 ranging from the highest priority (5) to the lowest priority (1), then compiled a matrix within each  
16 field office’s jurisdiction to rank the areas and subregions in terms of the order in which routes in  
17 those areas and subregions will be signed. *Id.* at 7.

18 The plan then provides more details about the specifics of the signing process, *id.* at 8, and  
19 the BLM staff. *Id.* at 9-10. BLM notes that, for “the 28 staff members assigned to the signing  
20 teams, all other job priorities have been set aside or deferred in order to satisfactorily accomplish  
21 the court order.” This means that the implementation of the Signing Plan necessarily requires a  
22 significant portion of the staffs of both the Barstow and Ridgecrest Field Offices, including park  
23 rangers and firefighters among others, to set aside their other required duties in order to comply  
24 with the court’s order.

25 The plan describes the additional training efforts needed to ensure efficient and safe use of  
26 equipment by all members of the signing teams. *Id.* at 11. The plan also lists the supplies and  
27 equipment inventory needed to carry out the signing effort. *Id.* at 12-13. Finally, BLM details  
28 the project funding requirements to implement the Signing Plan, which total approximately

1 \$1,958.990. As noted, “all funding will be BLM appropriated and therefore will result in other  
2 activities being deferred as described in Section VI” of the Signing Plan. *Id.* at 14. As a result of  
3 the required expenditures to carry out the plan, “a substantial workload that has been identified  
4 through the BLM annual work planning process and has accomplishments associated with the  
5 funding, is no longer funded,” which could lead to reduced funding in upcoming years and the  
6 inability to complete other important functions and requirements in the WEMO Planning Area.

7 In addition to the plan itself, BLM is providing the court and the parties with Appendix  
8 A1 and Appendix A2, which set forth the detailed “Priority Ranking Criteria” for both the  
9 Barstow and Ridgecrest Field Offices. Finally, BLM provides Appendix B, a copy of an earlier  
10 memorandum that set forth the California Desert District Route Signing Strategy.

11  
12 Dated: March 30, 2011

Respectfully submitted,

13 IGNACIA S. MORENO  
14 Assistant Attorney General  
15 Environment & Natural Resources Division

16 /s/ *Charles R. Shockey*

17 CHARLES R. SHOCKEY, Attorney  
18 DC Bar No. 914879  
19 U. S. Department of Justice  
20 Environment and Natural Resources Division  
21 Natural Resources Section  
22 501 “I” Street, Suite 9-700  
23 Sacramento, CA 95814-2322  
24 Tel: 916-930-2203 / Fax: 916-930-2210  
25 Email: [charles.shockey@usdoj.gov](mailto:charles.shockey@usdoj.gov)  
26 Attorneys for Federal Defendants  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on March 30, 2011, I filed the “Federal Defendants’ Notice of Filing of Sign Implementation Plan” through the court’s ECF system, which automatically serves a copy on all counsel of record.

*/s/ Charles R. Shockey*

CHARLES R. SHOCKEY  
Attorney for Federal Defendants

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28