

## **CHAPTER 5.0**

# **Consultation and Coordination**

### **5.1 Interrelationships**

The scattered nature of BLM-administered land in the Planning Area makes it essential for BLM to collaborate, cooperate, and coordinate with adjacent and intermingled land owners and managers in the development and implementation of this land use plan.

#### **5.1.1 Other Federal Agencies**

As a part of this planning effort and in implementing on-the-ground activities, BLM executes ESA Section 7 consultation with the USFWS. In 2001, BLM and USFWS finalized a consultation agreement to establish an effective and cooperative ESA Section 7 consultation process. The agreement defines the process, products, actions, schedule, and expectations of BLM and USFWS on project consultation. One Biological Assessment will be prepared to determine the effect of the Preferred Alternative on all relevant listed, proposed, and candidate species, and associated critical habitat. The Biological Assessment will expose all expected environmental effects, conservation actions, mitigation, and monitoring including analysis of all direct and indirect effects of plan decisions and any interrelated and interdependent actions. As this plan's decisions are implemented, actions determined through environmental analysis to potentially affect species listed or candidate species for listing under ESA will initiate more site-specific consultation on those actions.

The Sikes Act (16 U.S.C. 670 et seq.) authorizes the DOI in cooperation with state agencies responsible for administering fish and game laws to plan, develop, maintain, and coordinate programs for conserving and rehabilitating wildlife, fish, and game on public lands within its jurisdiction. The plans must conform to overall land use and management plans for the lands involved. The plans could include habitat improvement projects and related activities and adequate protection for species of fish, wildlife, and plants considered endangered or threatened. BLM must also coordinate with suitable state agencies in managing state-listed plant and animal species when the state has formally made such designations.

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The BLM coordinates its fire management activities with the actions of related federal and state agencies responsible for fire management. The Federal Wildland Fire Policy is a collaborative effort that includes the BLM, USFS, National Park Service (NPS), USFWS, Bureau of Indian Affairs, the National Biological Service, and state wildlife management organizations. The collaborative effort has formulated and standardized the guiding principals and priorities of wildland fire management. Collaboration of the Federal Wildland Fire Policy on a nationwide scale has provided common priorities and objectives for federal land management agencies including protection of human life, property, and natural/cultural resources as secondary priorities. This policy also provides recognition of wildland fire as a critical natural process that should be safely reintroduced into ecosystems that are wildfire dependent across agency boundaries. The National Fire Plan is a collaborative interagency effort to apply the Federal Wildland Policy to all Federal Land Management Agencies and partners in state forestry or lands departments. Operational collaboration between the BLM, USFS, NPS, and USFWS is included in the Interagency Standards for Fire and Fire Aviation Operations 2003. This federally approved document addresses fire management, wildfire suppression, fuels management and prescribed fire safety, interagency coordination and cooperation, qualifications and training, objectives, performance standards, and fire management program administration.

The BLM or project applicant would coordinate with the USACE regarding any future activities within or affecting jurisdictional waters or wetlands; invasive plant removal within jurisdictional wetlands may require a permit, if the soil would be disturbed or if heavy equipment is used. EPA and USACE regulate wetland habitats under the CWA.

BLM would coordinate with Department of Defense prior to approval of ROWs for renewable energy, utility, and communication facilities to ensure that these facilities would not interfere with military training routes.

BLM coordinates with the USBP on border initiatives and the protection of cultural resources.

BLM coordinates with the USFS in the management of that portion of the Pacific Crest NST that crosses BLM-administered lands in the Planning Area.

## 5.1.2 State, County, and Local Governmental Agencies

The BLM works cooperatively with CDFG. Under California laws, the CDFG is responsible for the preservation and management of fish and wildlife found within the State of California. The BLM is likewise responsible for the management of fish and wildlife habitat on BLM-administered lands. BLM assists CDFG by providing the appropriate agreements or permits for conducting wildlife management activities on BLM lands, as well as assisting with the collection of and sharing of data. BLM law enforcement patrols and enforces game violations on BLM lands. Under the Sikes Act, BLM contributed to development of the McCain Valley Wildlife Management Area and Management Plan.

Regional transportation planning and construction of roadways and highways is generally conducted by state or regional agencies, such as California Department of Transportation, county departments of transportation, and city transportation departments. When these agencies plan and develop roadways that cross public lands, BLM will coordinate with the responsible agency to develop design features that minimize the fragmenting effect of the planned roadway. BLM will work with the responsible agency to evaluate and incorporate safe and effective wildlife crossings to ensure species long-term viability and maintain habitat connectivity. Where planned roadways potentially fragment other resources, such as (but not limited to) recreation routes or trails, grazing allotments, or mining operations, BLM will work with the responsible agency to provide continued connectivity for those purposes as well. BLM will also work with the agency to provide continued safe access to public lands from any developed roadway for recreation and other public land users.

The BLM will coordinate with the County of San Diego's Department of Environmental Health Land Use Program which regulates the design, construction, maintenance, and destruction of water wells throughout San Diego County, and with the DWR for water quality testing of any new wells. BLM coordinates with the California Department of Forestry and Fire Protection (CAL FIRE) and the U.S. Forest Service on fire suppression under a Cooperative Fire Protection Agreement, and coordinates with CAL FIRE on water use for water tanks used in fire suppression.

The BLM cooperates with the County of San Diego's East County MSHCP planning efforts through data collection and sharing. In addition, BLM cooperates on other issues, as they arise, that are of mutual interest to both BLM and the County of San Diego.

## 5.1 Interrelationships

BLM is one of the leaders of a newly formed binational biodiversity working group, which is bringing together local, state, and federal agencies and non-governmental organizations from both sides of the border to coordinate conservation planning in the border region, known as Las Californias. Las Californias lies at the center of a global biodiversity hotspot. It is also a growing metropolitan area of more than 5 million people, where habitat fragmentation from development and roads severely challenges the integrity and functionality of the ecosystems and the natural resources they support. However, there are still large patches of habitat that are not currently altered by human uses. Major investments have been made in conserving public lands on the U.S. side of the border. Within the region, nearly 61 percent of undeveloped lands are in public ownership, which includes lands administered by the BLM, FS, USFWS, CDFG, Cuyamaca Rancho and Anza-Borrego Desert State Parks, CAL FIRE, and the City and County of San Diego (CBI et al. 2004). By contrast, less than 1 percent of undeveloped land in the Baja California border region is in public ownership (CBI et al. 2004). However, land use patterns on both sides of the border are such that there remain opportunities to achieve conservation of the unique natural resources of the region.

In 2003, The Nature Conservancy, Conservation Biology Institute, and Pronatura, a Mexican NGO, launched an effort to create a vision for a conservation network that protects the plants, animals and natural communities of the California – Baja California borderlands. This was memorialized in the *Las Californias Binational Conservation Initiative* report. Working in the border region presents challenges due to cross-border differences in land ownership, conservation patterns, legal mechanisms, and available financial resources for achieving land conservation. Achieving the *Las Californias* goals will require the work of many partners.

BLM also highlights implementation of the *Las Californias Initiative* in other forums such as the DOI Border Field Coordinating Committee and the Border Management Task Forces.

BLM would coordinate with local communities, Native American tribes and groups, Cleveland National Forest, California State Historic Preservation Office, San Diego Archaeological Society, San Diego County, CDFG, USFWS, USBP, California State Parks, CAL FIRE, California State Lands Commission, and local public health and safety organizations, and various NGOs in the administration of the SRMAs. BLM also coordinates with California Department of Conservation for gating mines for bats.

### 5.1.3 Consultation with Native Americans

Consultation with Native Americans to comply with EOs regarding Government-to-Government relations with Native Americans and other federal laws and regulations, formal and informal consultation and contacts were made with interested tribal entities at several points in the planning process. BLM initially invited Native American tribes to formally consult on this project through letters, which were sent in December 2004. A letter was sent to the chairman of each band or tribe which could have cultural ties to the Planning Area or had expressed an interest in the Planning Area. Letters were also sent to council members, staff, and individuals who might have an interest or special knowledge of the Planning Area. Each letter detailed the need for a new plan, described the Planning Area, and requested comments on any and all issues that may have been of concern to the tribe, including religious or cultural values that may be affected by planning decisions. In January 2005, BLM, several other federal agencies, and the tribes participated in two general coordination meetings and, at these meetings, BLM announced that development of a plan was in process. In January and February 2005, BLM also followed the formal invitations to consult with telephone calls to those tribes which had not responded to the invitation to consult or provide comments on the plan. In September 2006, an additional letter was sent to the tribes informing them that the planning process was still underway, reinviting their participation in the process. This was followed up by the mailing of a copy of the DRMP/DEIS in spring of 2007, telephone calls, and face-to-face meetings with certain tribes to discuss the plan. Native American tribes and interested persons will continue to be consulted and comments requested at key milestone points in the planning process and will continue through plan implementation. Native American tribal governments and organizations contacted are listed below.

- Campo Band of Mission Indians
- La Posta Band of Mission Indians
- Manzanita Band of Mission Indians
- Ewiiapaayp Band of Mission Indians
- Inaja-Cosmit Band of Mission Indians
- Santa Ysabel Band of Mission Indians
- Mesa Grande Band of Mission Indians
- Los Coyotes Indian Reservation
- Barona Band of Mission Indians

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- Jamul Indian Village
- Sycuan Band of Mission Indians
- Viejas Band of Mission Indians
- San Pasqual Band of Mission Indians
- Kwaaymii Laguna Band of Mission Indians
- Fort Yuma Indian Reservation
- Torres-Martinez Desert Cahuilla Indians
- Morongo Band of Mission Indians
- Rincon Band of Mission Indians
- Cocopah Indian Tribe
- Fort Yuma Quechan Tribe
- Kumeyaay Cultural Historic Committee
- Kumeyaay Cultural Repatriation Committee

### 5.1.4 Consultation with the California State Historic Preservation Officer

The Bureau of Land Management initiated formal consultation with the SHPO by letter in December 2004. BLM initiated consultation in accordance with the Programmatic Agreement among the Bureau of Land Management, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers regarding the Manner in which BLM Will Meet Its Responsibilities under the National Historic Preservation Act (1997) and the Protocol Agreement between the California State Director of the BLM and the California SHPO (1998). Consultation regarding historic properties that might be affected by this plan is ongoing. BLM provided the SHPO with a presentation and briefing on the plan in July 2007, including BLM's efforts to identify and evaluate historic properties that might be affected by plan decisions as well as BLM's efforts to plan for the future management and protection of historic properties within the planning area. BLM and SHPO also discussed consultation issues related to process and plan implementation, including the designation of routes of travel as part of plan implementation. Consultation regarding historic properties that might be

affected by this plan will continue, and final determinations and findings for both the plan and the designation of routes of travel will be completed and reflected in the Record of Decision.

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## **5.2 Public Comment Process**

### **5.2.1 DRMP/DEIS Public Meetings**

Three formal public meetings were held during the public comment period on the DRMP/DEIS. These meetings were held April 2 through 4, 2007 in San Diego, Julian, and Boulevard, California. The meetings provided an opportunity for interested members of the public to learn more about the analysis contained in the DRMP/DEIS, as well as provide an opportunity for attendees to provide written comments on the document.

### **5.2.2 Comment Analysis Process**

The BLM received 201 comment letters, and 238 comments were coded. Comment letters were submitted through public comment forms from public meetings, postal letters, faxes, e-mails, and website submittal from individuals, agencies, organizations, and groups during the public comment period on the DRMP/DEIS. Comment letters were received from four different states, with the majority from California (98%).

Two sets of form letters were received; 99 form postcards were received, and seven letters were received with form comments included. Ten comment letters requested time extensions. The State Director considered this issue and determined that extension requests would not be granted. Several themes were noted in the comment letters: nine letters expressed a preference for Alternative A; 117 letters expressed a preference for Alternative C, including the set of 99 form postcards; three letters expressed a preference for alternative D; two letters expressed a preference for Alternative E; 18 letters expressed a preference for higher VRM ratings in certain areas of the Planning Area or restrictions on the consideration of wind energy ROWs; and seven letters expressed a preference for the consideration of wind energy rights of way.

All individuals and organizations requesting to be put on the project mailing list in an official comment letter during the public comment period have been added, including the Boulevard Planning Group and the Jacumba Sponsor Group, as requested. Furthermore, all individuals and organizations who submitted comments during the public comment period have been added to the mailing list, as well as individuals and groups that did not submit formal comments, but either asked to be put on the mailing list or requested a copy of the DRMP/DEIS.

### 5.2.3 Coding and Summary of Comments

Public comment letters resulted in 241 individual comments. To analyze these comments, BLM followed the USDA Forest Service Content Analysis Team (CAT) process for comment analysis. This process has been used to analyze hundreds of thousands comments over numerous EISs, and BLM believes it to be a defensible process to catalog and address comments.

An Excel letter log and an Access software database were created to track letters and comments. The letter log maintained information such as the type of response (e.g., received at a public meeting or through a comment letter, received through postal mail or e-mail), respondent information (e.g., from an individual, government, tribe, or interest group), name and address, and number of signatures on the letter. The software database sorted each individual comment by code (see below).

When a letter was received, the original was date-stamped and photocopied, with one copy retained for the Administrative Record. Each letter was scanned and assigned a number both on the electronic scanned file and on a label affixed to a “working” copy of the letter. The working copy was logged into the letter log, and similar information was also noted on the label, including items such as type of response, the number of signatures, and if the comment was a form letter.

The coding process required identification of standalone comments. Three “first readers” read and coded the comment letters. A fourth person was the “second reader” who verified the accuracy and consistency of the coding. The coded comments were then entered into the Access database. The coding included an action code (which included 222 codes categorized by section related to a range of actions that the commenter was asking (hypothetical example: “Permanently cancel the X grazing allotment”) and a rationale code, which comprised the expressed reason for the comment (e.g., impacts to archaeological sites). The section categories are listed below in the order of the issues identified by the public for this PRMP/FEIS.

- Processes
- Alternatives/Options
- Natural Resources Management
- Access and Transportation System Management
- Recreation Management

- Lands and Realty Actions
- Special Area Designations
- Social and Economic

All comment letters received during the public comment period were reviewed and considered. Comments that presented new data or addressed the adequacy of the document, the alternatives, or the analysis are responded to in this PRMP/FEIS pursuant to BLM policy. There were also many comments received which requested further clarification in the document. Although not required to be addressed, these comments requesting clarification may have resulted in additional language or revisions throughout the PRMP/FEIS.

Comments expressing personal opinions or with no specific relevance to the adequacy or accuracy of the DRMP/DEIS were considered but may not have been responded to directly.

Not all comments are presented in this section. Some of these comments are examples, and similar comments may be repeated in other letters. Complete comment letters are on the compact disc published with this PRMP/FEIS. Although 201 comment letters were received during the public comment period, the numbering of the comments included some repeated submittals (i.e., e-mail, fax, and mail submittal of the same letter); while repeat submittals may have received a number, they are not counted in the total. Consequently, the numbering of comment letters on the CD and in the Response to Public Comments below includes 201 comment letters, but numbering of letters up to 227.

## 5.2.4 Response to Public Comments

### Section: Processes

**Action Code** 10000 Decision Making Process and Methods

**Rationale Codes** 61 Local Citizens/Communities

Comment # 172

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0062	MITCHELL	MARISA	ASPEN SF

I'm trying to find out when a final decision is expected on the ESDRMP.

RESPONSE: The anticipated date of the proposed RMP/ FEIS is August 2007. The anticipated date of the approved RMP and ROD is December 2007.

**Rationale Codes** 100 Laws, policies

Comment #146

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0001	TERZICH	CHRIS	SEMPRA UTILITIES

Under the 2005 Energy Policy Act it may be advisable to include the Sunrise Powerlink alternatives where applicable within the Eastern San Diego Resource Management Plan.

RESPONSE: The BLM Land Use Planning Handbook, H-1601-1 (Appendix C, Section E, item 7) provides that the designation of utility corridors is the RMP-level decision. Within the Planning Area, one utility corridor was identified with the intent that all major utility rights-of-way traversing the planning area be located only within this corridor. Several of the currently proposed alternatives for the Sunrise Powerlink do conform with this corridor designation. The issuance of a major utility ROW, such as for the Sunrise Powerlink, is an implementation level decision and must either conform to the RMP or would require an amendment to the RMP before approval. Furthermore, the planning process, which began in August 2004 with the publication of the NOI, cannot be put on hold, as CEQ regulations provide (40 CFR 1506.1) that once a NEPA process begins, no action may be taken that would have an adverse environmental impact or limit the choice of reasonable alternatives.

**Rationale Codes** 160 Agency Rules, Plans, Policies

Comment #20

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0150	VOLKER	STEPHAN C.	LAW OFFICES OF STEPHAN C. VOLKER

Furthermore, the Plan reduces access to outdoor recreation and limits recreational use by taking lands now used for recreation out of the public domain.

RESPONSE: Section 102(a)(7) of FLPMA mandates that BLM-administered lands be managed for “multiple use and sustained yield”. Concurrent multiple uses occurring on BLM-administered lands are typically lands and realty actions (such as issuance of a right-of-way), recreational activities, livestock grazing, wildlife habitat management, mineral extraction, etc. As such, the issuance of a right-of-way, such as authorizing a major utility power line or wind energy generation facility, does not constitute a land disposal action. Land disposal actions constitute removal of land from federal ownership (from the public domain) via sale, exchange, or R&PP lease conveyance. While specific facilities (such as the immediate area surrounding structures, electrical infrastructure, etc.) may be restricted for security and safety reasons, the general ROW area would remain available for public use.

Comment #101

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0167	FILNER	BOB	U.S. HOUSE OF REPRESENTATIVES

I believe that any decisions on the Resource Management Plan should be placed on hold while the future of the proposed Sunrise Powerlink and other projects are debated within the community.

RESPONSE: The BLM Land Use Planning Handbook, H-1601-1 (Appendix C, Section E, item 7) provides that the designation of utility corridors is the RMP-level decision. Within the Planning Area, one utility corridor was identified with the intent that all major utility rights-of-way traversing the planning area be located only within this corridor. Several of the currently proposed alternatives for the Sunrise Powerlink do conform with this corridor designation. The issuance of a major utility ROW, such as for the Sunrise Powerlink, is an implementation level decision and must either conform to the RMP or would require an amendment to the RMP before approval. Furthermore, the planning process, which began in August 2004 with the publication

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of the NOI cannot be put on hold, as CEQ regulations provide (40 CFR 1506.1) that once a NEPA process begins, no action may be taken that would have an adverse environmental impact or limit the choice of reasonable alternatives.

### **Rationale Codes** 161 Previous Resource Management Plans & Amendments

Comment #18

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0150	VOLKER	STEPHAN C.	LAW OFFICES OF STEPHAN C. VOLKER

BLM is attempting to make the Plan conform to a future project, rather than requiring any future project to conform to the Plan. The fact that project proponents have already erected test windmills in the area - in violation of the current Resources Management Plan - further highlights BLM's predetermination that a wind farm should be sited in the McCain Valley, and not in alternative locations in the planning area.

RESPONSE: The BLM Land Use Planning Handbook, H-1601-1 (Appendix C, Section E, item 8) requires BLM to identify existing and potential development areas for renewable energy projects (e.g. wind and solar). In so doing, BLM strives to minimize conflicts between multiple resource uses of the same area such as Visual Resource Management objectives. The existing MFP (DOI BLM 1981a) allows for multiple uses and does not preclude the authorization and construction of meteorological/wind test towers.

## **Section: Processes**

### **Action Code** 10010 Levels of Decision Making

#### **Rationale Codes** 4 Clarity of Information/Presentation

Comment #202

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0147	FULLER	KELLY	

...what will be the impact of wind energy development in McCain Valley on the Class I air quality areas of Sawtooth Mountains Wilderness and Carrizo Gorge Wilderness? McCain Valley Road is not wide enough for turbines to be brought in on it (22' to 30' would be closer to industry standards) and so would have to be widened. New access roads for turbines would also have to be cut. This increase in dirt road surface, occurring

in an area that sees much OHV use, would definitely result in increased dust in the air. However, very nearby are two federal wilderness areas that are both mandatory Class I areas under the Clean Air Act: Carrizo Gorge Wilderness and Sawtooth Mountains wilderness.

RESPONSE: The Wilderness Management Policy (DOI BLM 1981b), Chapter II Management Policy for BLM-administered Wilderness, B.9 Buffer Zones and Adjacent Lands, states “No buffer zones will be created around Wilderness Areas to protect them from the influence of activities on adjacent land. The fact that non-wilderness activities or uses can be seen or heard from areas within the Wilderness shall not, of itself, preclude such activities or uses up to the boundary of the Wilderness Area.

When activities on adjacent lands are proposed, the specific impacts on those activities upon the wilderness resource and upon public use of the wilderness area will be addressed in environmental assessments or environmental impact statements as appropriate. Mitigation of impacts from outside wilderness will not be so restrictive as to preclude or seriously impede such activities.”

The authorization of a wind energy facility is a subsequent implementation-level decision (rather than an RMP-level decision) and the NEPA process for any future applications for wind energy must comply with this Wilderness Management Policy.

Federal Class I areas are defined in the Clean Air Act as national parks over 6,000 acres and wilderness areas and memorial parks over 5,000 acres, established as of 1977 (<http://www.epa.gov/air/visibility/report/>). In 1999, under the 1990 CAAA, the EPA promulgated the Regional Haze Rule to protect visibility in 156 mandatory Federal Class I areas. The Wilderness Areas within the Planning Area are not mandatory Federal Class I areas and therefore not subject to the Regional Haze Rule (40 CFR Part 51 Regional Haze Regulations; Final Rule, Federal Register / Vol. 64, No. 126 / Thursday, July 1, 1999 / Rules and Regulations).

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Comment #88

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0160	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

Is there not a long process that must be followed before any decision on PPM's request could be made?

RESPONSE: The authorization of a wind energy facility is a subsequent implementation-level decision (rather than an RMP-level decision) and a site-specific NEPA process would be required before the right-of-way application could be approved. This process would include public involvement opportunities.

Comment #114

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0171	TISDALE	DONNA	BOULEVARD PLANNING GROUP

The controversy and legal challenge to the Powerlink and its proposed routes, (a third alternate through our area was just added this month) warrants a public comment extension and/or a delay in a decision on this DRMP. It should be placed on hold until a final decision is made on the need for the new 500kV Sunrise Powerlink and the actual route. A very strong case has emerged challenging the need for the Sunrise Powerlink proposal overall. At this point, that decision is not expected until January 2008.

RESPONSE: The BLM Land Use Planning Handbook, H-1601-1 (Appendix C, Section E, item 7) provides that the designation of utility corridors is the RMP-level decision. Within the Planning Area, one utility corridor was identified with the intent that all major utility rights-of-way traversing the planning area be located only within this corridor. Several of the currently proposed alternatives for the Sunrise Powerlink do conform with this corridor designation. The issuance of a major utility ROW, such as for the Sunrise Powerlink, is an implementation level decision and must either conform to the RMP or would require an amendment to the RMP before approval. Furthermore, the planning process which began in August 2004 with the publication of the NOI cannot be put on hold, as CEQ regulations provide (40 CFR 1506.1) that once a NEPA process begins, no action may be taken that would have an adverse environmental impact or limit the choice of reasonable alternatives.

Comment #120

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0171	TISDALE	DONNA	BOULEVARD PLANNING GROUP

Pre-selection of site violates NEPA...

RESPONSE: The BLM Land Use Planning Handbook, H-1601-1 (Appendix C, Section E, item 8) requires BLM to identify existing and potential development areas for renewable energy projects (e.g. wind and solar). In so doing, BLM strives to minimize conflicts between multiple resource uses of the same area such as Visual Resource Management objectives.

Comment #121

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0171	TISDALE	DONNA	BOULEVARD PLANNING GROUP

...with the influx of new energy leases, projects, and plan updates... Where are the cumulative impact studies and a proper layout of all these proposals overall? How are they coordinated with other proposals being studied/pursued by other local, state and federal jurisdictions?

RESPONSE: The types of projects referenced in this comment as well as their detailed designs or layout are implementation-level decisions, rather than RMP-level decisions. Upon receipt of an application for these types of projects, BLM would require a site-specific NEPA analysis before any of these actions could be approved. Cumulative impacts as described in 40 CFR 1508.7 would be analyzed at that time, which would include a review of reasonably foreseeable future proposals by other jurisdictions, as appropriate.

Comment #128

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0171	TISDALE	DONNA	BOULEVARD PLANNING GROUP

Negative impacts to sole source groundwater resources from wind and geothermal facilities...

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RESPONSE: Approval of wind energy and geothermal facilities is an implementation-level decision, rather than an RMP-level decision, and will require site-specific NEPA analysis before any of these actions could be approved. An assessment of impacts to sole source groundwater resources would be made at that time.

Comment #134

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0173	BELENKY	LISA	CENTER FOR BIOLOGICAL DIVERSITY

one fairly large gemstone operation (greater than 10 acres of surface disturbance) is already projected to be developed in bighorn critical habitat within the next ten years. Id. At 4-78. As to this, the DRMP/DEIS merely notes that "mineral entry could result in effects to this species," which is wholly inadequate to meet NEPA's requirement that such effects be analyzed.

RESPONSE: The approval of a mining plan for this type of operation is a subsequent implementation-level decision (rather than an RMP-level decision) and a site-specific NEPA process would be required before the mining plan may be approved. As the site is located within critical habitat, approval of the mining plan would be subject to Section 7 consultation with USFWS. This information has also been added to Section 2.3.15.4 of the PRMP/FEIS.

Also note that this reference to a gemstone operation is a potential future development based on locatable mineral potential rather than based on a specific proposal. The text in Section 4.16.1 of the DRMP/DEIS has been revised to read as follows: "There is a potential, based on locatable mineral availability, for a gemstone mining operation greater than 10 acres to be implemented within the next 10 years. This locatable mineral potential is found within Peninsular Bighorn Sheep critical habitat in the Jacumba region of the Planning Area."

Comment #227

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0175	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

...Sunrise Power Link. San Diego Gas & Electric and the California Public Utilities Commission have introduced new routes since the DRMP and DEIS were published which puts some of the lines right through the ESDC planning area.

RESPONSE: The BLM Land Use Planning Handbook, H-1601-1 (Appendix C, Section E, item 7) provides that the designation of utility corridors is the RMP-level decision. Within the Planning Area, one utility corridor was identified with the intent that all major utility rights-of-way traversing the planning area be located only within this corridor. Several of the currently proposed alternatives for the Sunrise Powerlink do conform to this corridor designation. The issuance of a major utility ROW, such as for the Sunrise Powerlink, is an implementation level decision and must either conform to the RMP or would require an amendment to the RMP before approval.

Comment #236

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0182	PEUGH	JAMES A.	SAN DIEGO AUDOBON SOCIETY

we cannot support proposed wind farm sites that will significantly degrade wildlife habitat or floristic areas, important cultural sites, or undeveloped or roadless areas of significant scenic, recreational, or resource value.

RESPONSE: The BLM Land Use Planning Handbook, H-1601-1 (Appendix C, Section E, item 8) requires BLM to identify existing and potential development areas for renewable energy projects (e.g. wind and solar). In so doing, BLM strives to minimize conflicts between multiple resource uses of the same area such as Visual Resource Management, biological, and cultural objectives. Approval of wind energy facilities is an implementation-level decision, rather than an RMP-level decision, and will require site-specific NEPA analysis before any of these actions could be approved. An assessment of impacts to biological, visual, and cultural resources would be made at that time.

Comment #264

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0202	SCHOECK	ARNOLD F.	

The RMP calls for adding campgrounds, parking areas in some of the alternatives. But no estimate is made of the number, the location and the estimated size.

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RESPONSE: These activities are implementation-level actions for which development proposals and NEPA analysis would be conducted at the time a site-specific proposal and funding become available. The text in Section 2.3.16 has been revised to indicate that these are implementation-level decisions for future consideration.

### Comment #269

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0213	STOVIN	ED	SAN DIEGO OFF-ROAD COALITION

While it is clear that windmills are being considered in the Lark Canyon OHV area, there is no mention of how many would be installed, where they might be placed and how many OHV trails would be lost.

RESPONSE: The BLM Land Use Planning Handbook, H-1601-1 (Appendix C, Section E, item 8) requires BLM to identify existing and potential development areas for renewable energy projects (e.g. wind and solar). In so doing, BLM strives to minimize conflicts between multiple resource uses of the same area such as energy development and OHV recreation. Approval of wind energy facilities is an implementation-level decision, rather than an RMP-level decision, and will require site-specific NEPA analysis before any of these actions could be approved. While the facilities (such as the area surrounding structures, electrical infrastructure, etc.) may be restricted for security and safety reasons, the general area would remain available for public use.

Note that in response to public comments, the Lark Canyon OHV area has been identified as an exclusion area for renewable energy development (e.g., wind and solar) under Alternatives B, C, and E.

### Comment #6

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0220	ANONYMOUS		

The greatest danger in the backcountry is fire. And wind turbines catch fire.

RESPONSE: The BLM Land Use Planning Handbook, H-1601-1 (Appendix C, Section E, item 8) requires BLM to identify existing and potential development areas

for renewable energy projects (e.g. wind and solar). Approval of wind energy facilities is an implementation-level decision, rather than an RMP-level decision, and will require site-specific NEPA analysis before any of these actions could be approved. The NEPA analysis would require evaluation of wildfire potential from the proposed action, a plan of development, appropriate mitigation, and emergency response plan, before an ROW can be approved.

Comment #237

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0010	SINGLETON	DAVE	NATIVE AMERICAN HERITAGE COMMISSION

Your agency is urged to assess whether any proposed projects will have an adverse impact on these resources within the ‘area of potential effect (APE),’ and if so, to mitigate that effect.

RESPONSE: A Sacred Lands request has been submitted to the NAHC. BLM has been and will continue to consult with local tribal entities throughout this planning process.

**Rationale Codes**                      61 Local Citizens/Communities

Comment #178

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0092	CARRICK	MATTHEW	

It would be nice if there was a public discussion on this where citizens could look at maps that better outline the proposed areas because the map in the article shows all of McCain Valley and then some for use.

RESPONSE: The BLM Land Use Planning Handbook, H-1601-1 (Appendix C, Section E, item 8) requires BLM to identify existing and potential development areas for renewable energy projects (e.g. wind and solar). Approval of wind energy facilities is an implementation-level decision, rather than an RMP-level decision, and will require site-specific NEPA analysis before any of these actions could be approved. This process would include public involvement opportunities.

**Rationale Codes** 160 Agency Rules, Plans, Policies

Comment #214

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0150	VOLKER	STEPHAN C.	LAW OFFICES OF STEPHAN C. VOLKER

The proposed placement of multitudes of windmills and appurtenant facilities, including transmission lines and service roads, would violate the public's interest in preserving this pristine area by substantially degrading the recreational experience of visitors and by threatening the continued existence of endangered species in the area. Additionally, the Plan and the DEIR should not be approved because they violate the National Environmental Policy Act (NEPA) and the Federal Land Policy and Management Act (FLPMA) for the reasons discussed below.

The Plan and DEIS Fail to Accurately Portray the Impacts of Potential Future Wind Power Development on the Endangered Quino Checkerspot Butterflies in the McCain Valley and Therefore Violate NEPA....

...the Plan's proposed industrial development of wind turbines in potential habitat areas of the endangered butterfly is not adequately addressed in the DEIS.

RESPONSE: The BLM Land Use Planning Handbook, H-1601-1 (Appendix C, Section E, item 8) requires BLM to identify existing and potential development areas for renewable energy projects (e.g. wind and solar). In so doing, BLM strives to minimize conflicts between multiple resource uses of the same area such as visual, recreational, and biological objectives. Approval of wind energy facilities is an implementation-level decision, rather than an RMP-level decision, and will require site-specific NEPA analysis before any of these actions could be approved. An assessment of impacts to visual, biological, and recreational resources would be made at that time.

Comment #252

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0185	WELLS	MICHAEL L.	DEPARTMENT OF PARKS AND RECREATION, STATE OF CALIFORNIA

State Parks is very concerned that wind-related energy development in McCain Valley

will have significant visual impacts to the adjacent State Wilderness. With the typical tall wind turbine towers associated with this type of development, there is the potential for this development to be visible for many miles, thus seriously compromising the public's wilderness experience within Anza-Borrego Desert State Park.

RESPONSE: The BLM Land Use Planning Handbook, H-1601-1 (Appendix C, Section E, item 8) requires BLM to identify existing and potential development areas for renewable energy projects (e.g. wind and solar). In so doing, BLM strives to minimize conflicts between multiple resource uses of the same area such as Visual Resource Management and wilderness values. Approval of wind energy facilities is an implementation-level decision, rather than an RMP-level decision, and will require site-specific NEPA analysis before any of these actions could be approved. An assessment of impacts to visual resources and wilderness values would be made at this time.

Generally, BLM would treat state designated wilderness in the same manner as designated wilderness is managed on BLM-administered public lands. BLM's Wilderness Management Policy (DOI BLM 1981b), Chapter II Management Policy for BLM-administered Wilderness, B.9 Buffer Zones and Adjacent Lands, states "No buffer zones will be created around Wilderness Areas to protect them from the influence of activities on adjacent land. The fact that non-wilderness activities or uses can be seen or heard from areas within the Wilderness shall not, of itself, preclude such activities or uses up to the boundary of the Wilderness Area.

When activities on adjacent lands are proposed, the specific impacts on those activities upon the wilderness resource and upon public use of the wilderness area will be addressed in environmental assessments or environmental impact statements as appropriate. Mitigation of impacts from outside wilderness will not be so restrictive as to preclude or seriously impede such activities."

<b>Rationale Codes</b>	400 Roads and Trails, Trans System		
Comment #219			
Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0174	KLAASEN	LARRY B.	SIERRA CLUB, SAN DIEGO CHAPTER

5.2 Public Comment Process

7. Para 2.3.17 pg 2-106. A significant impact to the area is Routes of Travel. They should be included in the RMP, so they can be evaluated in the context of the entire plan.

14. Para 2.3.17 pg 2-107. What public notification is made for Designation of routes of travel within the Planning Area as Implementation-Level Decisions?

15. When will public comment and notification occur for routes of travel in the RMP?

RESPONSE: Section 2.3.17 of the DRMP/DEIS provides information related to the RMP-level decisions, which are OHV Area Designations. Section 2.3.17.2 provides the Implementation Level Decisions for Routes of Travel being considered for each alternative. This section also provides maps illustrating the proposed routes of travel for each alternative (see Maps 2-19 to 2-22 of the PRMP/FEIS). The decision on these implementation level decisions will be made in the ROD. The 90-day public review and comment period on routes of travel as presented in the DRMP/DEIS for each alternative ended on May 31, 2007.

**Rationale Codes**                      640 Utility Corridors

Comment #144

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0001	TERZICH	CHRIS	SEMPRA UTILITIES

SDG&E would like to ensure that there is coordination of effort between the Eastern San Diego District of the BLM and the El Centro District with regards to the Sunrise Powerlink project and the existing joint EIR/EIS document currently being prepared by BLM El Centro and the California Public Utilities Commission

RESPONSE: The El Centro Field Office manages the BLM-administered lands within the Eastern San Diego County Planning Area.

**Rationale Codes**                      641 Wind Energy

Comment #119

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0171	TISDALE	DONNA	BOULEVARD PLANNING GROUP

Right of Way for 17,616.68 acres granted without public notice or comment

RESPONSE: A ROW was issued for testing and monitoring (meteorological towers). In the application, the applicant advised BLM that they were interested in the potential development of wind resources on 17,616.68 acres. No rights were authorized on those lands beyond testing and monitoring. An environmental assessment of the testing and monitoring ROW application was prepared in accordance with BLM NEPA procedures.

**Rationale Codes**                      815 Scenery, Visual Resources

Comment #80

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0150	VOLKER	STEPHAN C.	LAW OFFICES OF STEPHAN C. VOLKER

The Plan and DEIS Improperly Minimize Degradation of Recreational and Visual Resources in the McCain Valley and Surrounding Areas and Therefore Violate NEPA.

The proposed alternative improperly minimizes the significant degradation of recreation and visual resources in the McCain Valley and surrounding areas and therefore also fails NEPA’s “hard look” test. The DEIS does not adequately consider the impacts of the industrialization of an area that is widely known and frequently visited for its scenic qualities and wilderness activities. In its DEIS, BLM fails to acknowledge that the visitor experience will be substantially diminished by the creation of wind farms throughout the valley.

Additionally, the DEIS fails to accurately portray the loss of unimpaired vistas from many locations around and outside of the McCain Valley. These vast, spectacular visual resources are critically important to residents and visitors alike and will be significantly impaired by the presence of wind turbines, access roads, and electrical transmission lines.

Nighttime vistas, both within and outside of the valley, will also be significantly degraded by flashing, bright lights. Where currently only dark, shadowy ridgelines separate the horizon from the darkness of the night sky, a line of intrusive lights – like a massive airport landing strip spread across the hills – will take its place. The DEIS failed to adequately address this impact both on aesthetic values and on wildlife.

RESPONSE: The BLM Land Use Planning Handbook, H-1601-1 (Appendix C, Section E, item 8) requires BLM to identify existing and potential development areas for renewable energy projects (e.g. wind and solar). In so doing, BLM strives to minimize conflicts between multiple resource uses of the same area such as Visual Resource Management and recreation objectives. Approval of wind energy facilities is an implementation-level decision, rather than an RMP-level decision, and will require site-specific NEPA analysis before any of these actions could be approved. An assessment of impacts to recreation and visual resources would be made at that time.

**Section: Processes**

**Action Code**      10200      Coordination and Consultation with Other Agencies

**Rationale Codes**                      4 Clarity of Information/Presentation

Comment #29

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0151	WEINER	TERRY	DESERT PROTECTIVE COUNCIL

The Desert Protective Council encourages BLM El Centro to be proactive in this management plan in being especially vigilant and protective of the areas of the management area that border on areas administered by other agencies and plan actions and measures that protect the goals and enhance the management plans of the Cleveland National Forest and that conform to the general management plan and goals of Anza-Borrego Desert State Park.

RESPONSE: The scattered nature of BLM-administered land in the Planning Area makes it essential for BLM to collaborate, cooperate, and coordinate with adjacent and intermingled land owners and managers in the development and implementation of this land use plan. Sections 5.1.1 through 5.1.4 discusses how BLM coordinates and consults with the various stakeholders in the Planning Area.

**Rationale Codes**                      530 Off Highway Vehicle Use (OHV)

Comment #87

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0160	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

BLM should... commit to working with the County of San Diego on OHV issues. The County is trying to design an OHV ordinance to address the same issues you have and your input could be helpful.

RESPONSE: Section 5.1.2 of the DRMP/DEIS has been revised to include the following statement: "In addition, BLM cooperates on other issues, as they arise, that are of mutual interest to both BLM and the County of San Diego."

**Section: Processes**

**Action Code**      10300 Coordination and Consultation with Tribes

**Rationale Codes**      40 American Indians/Tribes

Comment #259

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0190	PINTO	HARLAN	EWIIAAPAYYP BAND OF KUMEYAAY INDIANS

The Tribe also renews its re-affirms its previous request for government-to-government consultation with the BLM EI Centro Field Office for implementation of the final adopted RMP/EIS and Alternative.

RESPONSE: BLM has consulted and will continue to consult with the Ewiiapayyp Band of Kumeyaay Indians and all other tribes located or involved in the Planning Area, in accordance with BLM policy.

**Rationale Codes**      160 Agency Rules, Plans, Policies

Comment #53

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0144	COYLE	COURTNEY ANN	HELD-PALMER HOUSE

Ms. Lucas respectfully requests to be consulted on cultural resource surveys, ACEC designation refinements, ACEC plan development and management, restoration and monitoring of acquired properties on and in the vicinity of the Laguna Mountains.

RESPONSE: BLM has consulted and will continue to consult with Ms. Lucas of the

## 5.2 Public Comment Process

Kwaaymii Laguna Band of Indians and all other tribes located or involved in the Planning Area, in accordance with BLM policy.

### **Rationale Codes**                    640 Utility Corridors

Comment #57

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME #
EC-0144	COYLE	COURTNEY ANN	HELD-PALMER HOUSE

Continue and deepen consultation with tribal entities during Final RMP/EIS and Plan implementation processes including the Management Actions described in Table 2-6.

RESPONSE: BLM has consulted and will continue to consult with the tribal entities located or involved in the Planning Area, in accordance with BLM policy.

## **Section: Processes**

### **Action Code**                    10400 Consistency with Other Actions/Agencies

#### **Rationale Codes**                    133 FLPMA

Comment #124

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0171	TISDALE	DONNA	BOULEVARD PLANNING GROUP

This DRMP must be fully consistent/compatible with the Anza Borrego State land use plan and protection of state listed sensitive species and habitat. There can be no conflict. This DRMP conflicts with the current Mtn. Empire Subregional plan for San Diego County under Industrial Goal Policy and recommendations (pg 9) states: #11: Deny future industrial or commercial development which adversely impacts the Mountain Empire Subregional area, such as wind turbine generators, for any of the following reasons: a) Safety of the general public; b) Noise pollution emanating from the site exceeding 65 (decibels) dBs at the property line, as it creates great human discomfort and adversely affects the tranquility of the rural environment; c) Such development may lead to the economic devaluation of contiguous properties (Ex. 12).

RESPONSE: BLM planning regulations in 43CFR1610.3-2 Consistency Requirements state the following: "(a) Guidance and resource management plans and amendments to management framework plans shall be consistent with officially approved or adopted resource related plans, and the policies and programs

contained therein, of other Federal agencies, State, and local governments and Indian tribes, so long as the guidance and resource management plans are also consistent with the purposes, policies and programs of Federal laws and regulations applicable to the public lands,..."

**Section: Processes**

**Action Code**      10500 Influences on Decision Making

**Rationale Codes**              4 Clarity of Information/Presentation

Comment #126

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0171	TISDALE	DONNA	BOULEVARD PLANNING GROUP

Page 4-92 of this DRMP states that "Solar and wind facilities may alter access to some backcountry areas and may adversely impact recreational use of nearby areas as well. Both solar and wind facilities require a number of acres to be withdrawn from other uses, but this is small in comparison to the Planning Area as a whole. Based on informal comments from the public and anecdotal evidence, this is not a significant concern on the part of the user communities."

For the record, the loss of any access to the much-loved McCain Valley area is a major concern and strongly opposed. Where did your anecdotal evidence and informal comments come from? They obviously did not come from this community. It would be interesting to see how and to whom these supposed questions were posed.

RESPONSE: While facilities, such as the area surrounding structures, electrical infrastructure, etc., may be restricted for security and safety reasons (e.g. fencing), the general area would remain available for public use. On BLM-administered lands, a withdrawal removes an area of federal land from settlement, sale, location, or entry under some or all of the general land laws, for the purpose of limiting activities under those laws to maintain other public values in the area or reserving the area for a particular public purpose or program. Withdrawals are also used to transfer jurisdiction over an area of federal land from one department, bureau, or agency to another. To clarify the intent, the term withdrawn has been deleted in cited section and the text revised accordingly.

## 5.2 Public Comment Process

Section 4.18.2.2 has been revised to reflect concerns expressed in public comments both for and against the potential for future wind energy development in the Planning Area.

### **Rationale Codes** 133 FLPMA

Comment #132

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0173	BELENKY	LISA	CENTER FOR BIOLOGICAL DIVERSITY

Thus, to comply with its FLPMA mandate to "take any action necessary to prevent unnecessary or undue degradation of the lands" and "minimize adverse impacts on the natural [and] environmental resources within BLM-administered lands, the BLM must exclude riparian areas from surface disturbance activities,..."

RESPONSE: Section 302(b) of FLPMA begins by stating, "In managing the public lands, the Secretary shall, subject to this Act and other applicable law and under such terms and conditions as are consistent with such law, regulate, through easements, permits, leases, licenses, published rules, or other instruments as the Secretary deems appropriate, the use, occupancy, and development of the public lands, including, but not limited to, long-term leases to permit individuals to utilize public lands for habitation, cultivation, and the development of small trade or manufacturing concerns: ..."

BLM direction is to assure that the "unnecessary or undue degradation" clause does not require either exclusion or avoidance but mitigation (e.g. avoidance, minimization) of the impact to the greatest extent possible by law.

## **Section: Processes**

### **Action Code** 11100 Multiple Use Management Emphasis

### **Rationale Codes** 133 FLPMA

Comment #19

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0150	VOLKER	STEPHAN C.	LAW OFFICES OF STEPHAN C. VOLKER

43 U.S.C.A. § 1701(a)(8). The Plan’s approval of industrial development in the McCain Valley does not satisfy FLPMA because it does not protect the quality of the scenic and environmental values of the valley or preserve the land in its natural condition, and because it reduces and degrades wildlife habitat including Quino checkerspot butterfly habitat.

RESPONSE: 43USC1701.Section 102(a)(7) of FLPMA mandates that BLM-administered lands be managed for “multiple use and sustained yield” and Section 102(a)(8) states that “the public lands be managed in a manner that will protect the quality of scientific, scenic historical, ecological, environmental, air and atmospheric, water resource, and archaeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use.”

Concurrent multiple uses occurring on BLM-administered lands are typically lands and realty actions (such as issuance of a right-of-way), recreational activities, livestock grazing, wildlife habitat management, mineral extraction, etc.

The BLM Land Use Planning Handbook, H-1601-1 (Appendix C, Section E, item 8) requires BLM to identify existing and potential development areas for renewable energy projects (e.g. wind and solar). Approval of wind energy facilities (referred to in the comment as industrial development) is an implementation-level decision, rather than an RMP-level decision, and will require site-specific NEPA analysis before any of these actions could be approved. The NEPA analysis would require evaluation of impacts to wildlife and wildlife habitat prior to site-specific BLM use authorization approval.

**Section: Processes**

**Action Code**      12000 Public Involvement

**Rationale Codes**      10 Persons and Groups

Comment #213

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0148	SPROFERA	CHRIS	

## 5.2 Public Comment Process

Making the document available in El Centro and Jacumba library and not in greater San Diego seems like an attempt to avoid public input.

RESPONSE: According to 40CFR1502.19, the El Centro Field Office published a notice of availability in the Federal Register, distributed copies to applicable federal, state, and local agencies, distributed copies to parties requesting copies. In an attempt to maximize public input, three public meetings were held, including one in downtown San Diego, in which copies were available. A press release identifying the availability of the DRMP/DEIS to the public was also prepared and submitted to media outlets within the Planning Area. Documents were also available both online and from the El Centro Field office and hard copies were also provided to the local libraries within the Planning Area.

### Rationale Codes

### 4 Clarity of Information/Presentation

Comment #192

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0129	CROUSE	SAM	

...you want to shut down this area which is supposed to be open to the public...

RESPONSE: 43USC1701.Section 102(a)(7) of FLPMA mandates that BLM-administered lands be managed for "multiple use and sustained yield". Concurrent multiple uses occurring on BLM-administered lands are typically lands and realty actions (such as issuance of a right-of-way), recreational activities, livestock grazing, wildlife habitat management, mineral extraction, etc. As such, the issuance of a right-of-way, such as authorizing a major utility power line or wind energy generation facility, does not constitute a land disposal action. Land disposal actions constitute removal of land from federal ownership (from the public domain) via sale, exchange, or R&PP lease conveyance. While facilities, such as the area surrounding structures, electrical infrastructure, etc., may be restricted for security and safety reasons (e.g. fencing), the general area would remain available for public use.

**Section: Processes**

**Action Code** 12110 Adequacy/Availability of Information

**Rationale Codes** 4 Clarity of Information/Presentation

Comment #263

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0202	SCHOECK	ARNOLD F.	

1996 EA Westside routes of travel had a detailed breakdown of the routes in the planning area with average widths and lengths.

RESPONSE: The FONSI for the referenced EA was never signed and a decision was never issued for the referenced project. In 2003, the ECFO used that information to prepare a subsequent NEPA document, Environmental Assessment and Draft Plan Amendment for Western Colorado Desert Routes of Travel Designation (DOI BLM 2002c), that only applies to routes on BLM-administered lands in Imperial County. The FONSI and final decision were signed in January 2003.

**Rationale Codes** 246 Water Quality

Comment #8

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0221	BLAZEJ	NOVA	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

The DEIS notes that data collected in 1978 showed that four springs were in excess of, or approaching, the recommended limits of chloride and/or sulfate concentrations for livestock and wildlife consumption (p. 3-20)...Recommendations: The FEIS should include the most recent information on water quality in the Planning Area and determine if the project will exacerbate any water quality issues. The FEIS should include appropriate mitigation measures, as necessary.

RESPONSE: The water quality data included in the DRMP/DIES on four springs in the Planning Area is the most recent available from the USGS.

**Rationale Codes** 340 Specially Listed Species, General/Multiple

Comment #240

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0185	WELLS	MICHAEL L.	DEPARTMENT OF PARKS AND RECREATION, STATE OF CALIFORNIA

Section 3-35, Section 3.7.11 PENINSULAR BIGHORN SHEEP. State Parks recommends updating the population estimate for the Peninsular Ranges in the document from 335 to "almost 800, as of October 2006".

In the section entitled, "Occurrence in Planning Area", we recommend changing the description near the bottom of the page to read "The Carrizo Canyon subpopulation occurs on BLM and State Park lands while the Vallecito Mts. And N. and S. San Ysidros groups occur primarily on Anza-Borrego Desert State Park land."

RESPONSE: Edits completed as requested in Chapter 3.

Comment #241

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0185	WELLS	MICHAEL L.	DEPARTMENT OF PARKS AND RECREATION, STATE OF CALIFORNIA

Section 3-50, 3.7.1.7 Unarmored Three-Spined Stickleback. In section "Occurrence in Planning Area," change ownership from "private" to "State Parks and Fish & Game lands near Scissors Crossing".

RESPONSE: Edit made as requested in Chapter 3.

**Section: Processes****Action Code** 12130 Outreach/Education**Rationale Codes** 10 Persons and Groups

Comment #257

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0186	RICHARDSON	CHRIS E.	

Notice of Intent

Why wasn't I notified of this by mail. When I expressed interest to Chris Knauf.

RESPONSE: BLM apologizes for this oversight. You have been included on the mailing list and will be contacted for all future BLM correspondence regarding this plan.

**Section: Processes****Action Code** 13000 Use of Science; Best Avail. Science**Rationale Codes** 50 Interest Groups

Comment #230

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0175	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

...the Conservation Biology Institute plan for the area of eastern San Diego County. This report, which is titled *Las Californias Linkages* is an important input into the MSCP. It is also a major component of land conservation acquisition efforts of a number of large conservation organizations in the area of the county east of Laguna Mountains. We believe this plan should be reviewed and consulted and included in the evaluation of this MP.

RESPONSE: BLM is one of the leaders of a newly formed binational biodiversity working group, which is bringing together local, state and federal agencies and non-governmental organizations from both sides of the border to coordinate conservation planning in the border region by building on the *Las Californias* effort that was spearheaded by the Nature Conservancy, Conservation Biology Institute and Pronatura, a Mexican non-governmental organization, in 2003. BLM highlights

## 5.2 Public Comment Process

implementation of the *Las Californias Initiative* in other forums such as the Department of Interior Border Field Coordinating Committee and the Border Management Task Forces. A more detailed discussion of the Las Californias Linkages report and BLM's participation in the binational working group has been added to Chapter 5 of the PRMP/FEIS.

### **Rationale Codes**                      237 Paleontological Resources

Comment #253

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0185	WELLS	MICHAEL L.	DEPARTMENT OF PARKS AND RECREATION, STATE OF CALIFORNIA

### Literature Cited

RESPONSE: Rogers (1992) and Jefferson (2006) were consulted during the preparation of the paleontological section. Section 3.10 of the DRMP/DEIS has been revised to include references to these documents.

### **Rationale Codes**                      250 Climate, Weather, and Atmospheric Processes

Comment #102

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0169	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

[Page 3-2] the historical data on rainfall does not provide an accurate context for planning. Data prepared by the County of San Diego Groundwater Hydrologist reviewed rainfall at Campo and Cuyamaca. Rainfall had increased from the late 1800's up to 1940. Since 1940 rainfall has continually been decreasing. Despite one or two large rainfall years in any 10 year period the average rainfall is below the thirty year average used by NOAA in seven of every 10 years. For plants and animals the water available is less than the average. Furthermore a statistical analysis of the rainfall data to factor out the infrequent heavy rain years shows that rainfall is on a continually decreasing trend line. In Campo the current average rainfall is less than 11 inches per year while the 30 year rainfall is 15.7 inches. The long term average often used is over 17 inches.

RESPONSE: The climate section in Chapter 3 of the DRMP/DEIS provides a general overview of existing conditions based on the best available information at the time of preparation. We were unable to locate and verify the information provided in the comment.

However, to address the concerns of the commenter, a discussion of potential effects from extended periods of drought has been added to Unavoidable Adverse Impact Sections 4.4.4 (Water Resources), 4.5.5 (Vegetation Resources), 4.6.7 (Wildlife Resources), 4.7.3 (Special Status Species), 4.8.5 (Wildland Fire), and 4.14.2 (Livestock Grazing) of the DRMP/DEIS.

**Rationale Codes**                      300 Biological Elements General/Multiple Biological

Comment #200

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0147	FULLER	KELLY	

Did PPM or its contractors provide data/information/research for this RMP?

RESPONSE: The biological and environmental documents in preparation by PPM Energy have not yet been submitted to BLM, with the exception of a habitat assessment conducted in 2005 for quino checkerspot butterfly by a USFWS permitted biologist. As this represented current information on this listed species, this habitat assessment was evaluated as part of this planning process. Please note that this same individual also conducted a habitat assessment and focused protocol survey in 2006 as a direct contractor to BLM.

PPM Energy provided a wind potential model that was then revised further based on special designations and critical habitat. This final data were presented in Figure 3-15 of the DRMP/DEIS. In response to this and other comments received, BLM further reviewed the data prepared and presented in the report *Assessing the Potential for Renewable Energy on Public Lands* prepared in 2003 by BLM and U.S. Department of Energy, Energy Efficiency and Renewable Energy. This assessment analyzed the potential for wind energy (and other renewable energy) development on public lands in the western United States. While the screening criteria used in the two reports (BLM and PPM Energy) are not identical, they are comparable with the result that the BLM report identified a larger area of potential wind energy development than PPM Energy identifies. This new data were incorporated into the PRMP/FEIS and used as the basis for identifying the areas that would be made available for potential renewable energy development (e.g., wind and solar). The PRMP/FEIS now also includes these areas as they vary by alternative in Maps 2-26 to 2-29.

**Rationale Codes**                    340 Specially Listed Species, General/Multiple

Comment #63

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0145	STEWART	JOHN	CALIFORNIA ASSOCIATION OF 4 WHEEL DRIVE CLUBS

No study so far conducted has established a causal connection between recreation activities and any perceived declines in the population of any threatened or endangered species known to reside in the Planning Area. At most, the technical data show that some recreational activities, in some areas, have the potential to displace some species on a very local level. This however cannot establish that recreational activities pose a substantial threat to an entire population or subpopulation of a particular plant or animal.

RESPONSE: The Recovery Plan for Bighorn Sheep of the Peninsular Ranges, California published by USFWS (2000) includes a thorough review and analysis of the research available at the time of publication. This document states that “a variety of human activities such as hiking, mountain biking, hang gliding, horseback riding, camping, hunting, livestock grazing, dog walking, and use of aircraft and off-road vehicles have the potential to disrupt normal bighorn sheep behaviors and use of essential resources, or cause bighorn sheep to abandon traditional habitat.” The literature cited in the Recovery Plan are incorporated in the PRMP/FEIS by reference and Section 4.7.12 of the DRMP/DEIS has been revised to summarize this information. Based on the information provided in the recovery plan, the PRMP/FEIS evaluates the potential for recreational activities to impact this listed species. Also note that BLM’s mandate is to ensure that activities on BLM-administered lands results in no adverse modification to critical habitat; thus BLM is required to make land use decisions to protect the critical habitat of listed species.

Comment #105

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0169	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

[Page 3-35] San Diego Natural History Museum has undertaken a series of exhaustive studies of San Diego County flora and fauna. The Bird Atlas published recently is a wonderful resource. Currently work is underway on a Mammal Atlas and a Plant Atlas. This information should be included in your planning...

RESPONSE: Both the San Diego Bird Atlas and the mammal data available from the San Diego Natural History Museum’s website were consulted in developing the

affected environment for the biological resources; however, the information was omitted from citations in the text and from the references section of the DRMP/DEIS. The bird and mammal sections have been reviewed and the citations and references added to the appropriate locations. Also note that any reference based on the previous San Diego Bird Atlas (Unitt 1984), has been reviewed and updated to reflect data included in the most current version (Unitt 2004).

**Rationale Codes**                      500 Recreation: General/Multiple/Other

Comment #205

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0147	FULLER	KELLY	

BLM participated in the Campers in California study in 1999-2000, what did people say on their surveys as to the activities they did in Cottonwood Campground?

RESPONSE: The survey was called “Campers in California Travel Patterns and Economic Impacts 1999-2000” and the information was not gathered by BLM. The state gathered the information and broke it down to reflect various aspects of the California camper. The report did not list activities by specific location but rather listed the most popular activities by agency groups (e.g. federal agencies, State Parks, etc.).

**Rationale Codes**                      530 Off Highway Vehicle Use (OHV)

Comment #68

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0145	STEWART	JOHN	CALIFORNIA ASSOCIATION OF 4 WHEEL DRIVE CLUBS

According to U. S. Forest Service studies conducted by the Southern Research Station, approximately 24% of the public have driven a motor vehicle off of a paved or gravel road at least once in the past year. And, this rate has been increasing with each of the congressionally mandated reports. As such, the need for increased opportunity to accommodate the increased demand for recreation.

RESPONSE: The report that appears to be referenced in the above comment is titled *Off-Highway Vehicle Recreation in the United States, Regions and States: A National Report from the National Survey on Recreation and the Environment (NSRE)* (Cordell et al, 2005). The statistic cited represents the estimated percentage of people over

## 5.2 Public Comment Process

the age of 16 who participated in OHV use across the country between Fall 2003 to Fall of 2004. The report also states that this represents an increase in estimated use of 16.8 percent from the Fall 1999 to Summer 2000 timeframe. Furthermore, California green sticker sales, as published by California State Parks in *Taking the High Road* (California State Parks 2002), there was a 108% increase in green sticker registrations between 1980 and 2002.

BLM did take into consideration the current and future expected recreational use on BLM-administered lands within the Planning Area as part of this planning process. BLM's mission is mandated to allocate land uses under the concept of multiple use management and sustained yield. Through the land use planning process, BLM management decisions strive to balance resource uses with resource protection. Under this mandate, recreation demand, including OHV use in the Planning Area were considered in the land use planning decisions developed for the Plan.

### Rationale Codes

820 Trust and Credibility

Comment #122

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0171	TISDALE	DONNA	BOULEVARD PLANNING GROUP

It has been alleged that, due to a lack of adequate staffing, the BLM relied on the biological and environmental reports developed by PPM Energy for their wind project, as the basis for this RMP Draft EIS. Such a practice is just wrong. We question the legality and ethics of this practice.

RESPONSE: The biological and environmental documents in preparation by PPM Energy have not yet been submitted to BLM, with the exception of a habitat assessment conducted in 2005 for quino checkerspot butterfly by a USFWS permitted biologist. As this represented current information on this listed species, this habitat assessment was evaluated as part of this planning process. Please note that this same individual also conducted a habitat assessment and focused protocol survey in 2006 as a direct contractor to BLM.

PPM Energy provided a wind potential model that was then revised further based on special designations and critical habitat. This final data were presented in Figure 3-15 of the DRMP/DEIS. In response to this and other comments received, BLM further reviewed the data prepared and presented in the report *Assessing the Potential for*

*Renewable Energy on Public Lands* prepared in 2003 by BLM and U.S. Department of Energy, Energy Efficiency, and Renewable Energy. This assessment analyzed the potential for wind energy (and other renewable energy) development on public lands in the western United States. While the screening criteria used in the two reports (BLM and PPM Energy) are not identical, they are comparable with the result that the BLM report identified a larger area of potential wind energy development than PPM Energy identifies. These new data were incorporated into the PRMP/FEIS and used as the basis for identifying the areas that would be made available for potential renewable energy development (e.g. wind and solar). The PRMP/FEIS now also includes these areas as they vary by alternative in Maps 2-26 to 2-30.

**Section: Processes**

**Action Code**      14000 Agency Organization, Funding and Staffing

**Rationale Codes**      237 Paleontological Resources

Comment #244

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0185	WELLS	MICHAEL L.	DEPARTMENT OF PARKS AND RECREATION, STATE OF CALIFORNIA

5.2 List of Preparers. No on-staff BLM paleontologic experts or consultants are listed in Table 5-1. Was the author/s of sections 3.30 and 4.10 a qualified paleontologist (see definitions The Society of Vertebrate Paleontology 1991, 1995, 1996, 2007)?

RESPONSE: The Paleontology sections were prepared by BLM field office and district geologists. Table 5-1 was revised to reflect this.

**Section: Processes**

**Action Code** 14130 Fees

**Rationale Codes** 500 Recreation: General/Multiple/Other

Comment #234

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0176	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

"2.3.16.3 Management Actions Common to All Alternatives [Page 2-105]" We want fees collected for use of these facilities. Use translates into maintenance and management. Those that play should pay in relation to the management and maintenance required. We support general fees like the USFS Adventure Pass. All money collected should go back to the facilities and management of the ESDC RMP.

RESPONSE: BLM currently collects and will continue to collect fees at the developed facilities and SRPs within the Planning Area, as described in Section 2.3.16.3 of the DRMP/DEIS. It is BLM policy to allow free access to public lands. Currently it is not BLM policy to require fees for access to public lands outside of designated "fee use areas."

**Section: Processes**

**Action Code** 14200 Staffing General

**Rationale Codes** 4 Clarity of Information/Presentation

Comment #22

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0151	WEINER	TERRY	DESERT PROTECTIVE COUNCIL

The plan to create Special Recreation Management Areas (SRMAs) has merit for the purpose of allowing for more recreational opportunities and for better management of recreation. The caveat we offer in relation to this plan is that BLM EI Centro describe in the Final EIS, exactly how they will be able to manage an increase in camping, hiking, equestrian and other opportunities in this planning area when it is arguable that they do not have the means to provide adequate ranger coverage in this area now, as is evidenced by the lack of control of the presence of non-street legal vehicles outside of the Lark Canyon ORV area. Trash dumping at Table Mt. ACEC and other places continues to be a problem as does target and non-target shooting in unauthorized areas. Please address in detail how BLM EI Centro plans to manage an expansion of

recreational opportunities.

RESPONSE: The BLM Land Use Planning (LUP) Handbook (H1601-1, Appendix C, II. Resource Uses, Section C. Recreation and Visitor Services) requires that SRMAs are established in an RMP. Each SRMA has a distinct, primary recreation-tourism market as well as a corresponding and distinguishing recreation management strategy. Anything not delineated as a SRMA is an extensive recreation management area (ERMA). Management within all ERMAs is restricted to custodial actions only. There are no ERMAs identified in the Planning Area. Therefore, most budget planning for recreational management is directed toward SRMAs. Section 202 of the Federal Land Policy and Management Act of 1976 (FLPMA) states that the Secretary shall, with public involvement and consistent with the terms and conditions of this Act, develop, maintain, and, when appropriate, revise land use plans which provide by tracts or areas for the use of the public lands. Land use plans are developed for the public lands regardless of whether such lands previously have been classified, withdrawn, set aside, or otherwise designated for one or more uses. Section 202 of FLPMA describes in detail how the uses of public lands are determined.

BLM would strive to establish partnerships with interested parties, cooperative agreements, and collaborations with volunteer groups to better facilitate management of recreational opportunities and discourage degradation of environmental resources.

BLM's staffing level is determined through the Congressional budget process. BLM will increase staff as funding becomes available.

**Section: Processes**

**Action Code**      14220 Volunteers

**Rationale Codes**      55 Recreation Groups

Comment #170

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0016	TUFT	WILLIAM	BACKCOUNTRY HORSEMEN OF CALIFORNIA, DEL SOL CHAPTER

Making arrangements with the groups such as the Backcountry Horsemen of California will give you access to many thousands of volunteer hours to help you maintain BLM

lands

RESPONSE: BLM has in the past and will continue to work with interested parties, including the Backcountry Horsemen of California, to provide volunteer opportunities within the Planning Area.

### Section: Alternatives/Options

**Action Code** 21000 Document(s) General (NOI, DIES, Plan)

**Rationale Codes** 4 Clarity of Information/Presentation

Comment #33

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0151	WEINER	TERRY	DESERT PROTECTIVE COUNCIL

Table 2-4 is confusing. For example, what does "Require surface disturbance activities to avoid adverse impacts to special status species habitat" mean?

RESPONSE: The text was revised as follows for clarity: Require that any surface-disturbing activities avoid adverse impacts to special status species habitat.

### Section: Alternatives/Options

**Action Code** 21100 Technical and Editorial (Spelling, Grammar, Consistency)

**Rationale Codes** 4 Clarity of Information/Presentation

Comment #187

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0119	SMITH	ROBERT	

a glossary of acronyms with brief descriptions would have been useful, particularly with regard to the various use designations (SRMA, RMZ, WA, WSA, ACEC)

RESPONSE: Pages AC-1 through AC-8 of the DRMP/DEIS provide a list of

acronyms. The glossary does include a definition for ACEC; however, it inadvertently was combined with Archeological District. This has been rectified in the PRMP/FEIS. Definitions for Wilderness Area (WA), Wilderness Study Area (WSA), Recreation Management Zone (RMZ), and Special Recreation Management Area (SRMA) have been added to the glossary:

**Wilderness Area (WA):** An area formally designated by Congress as part of the National Wilderness Preservation System as defined in the Wilderness Act of 1964 (78 Stat.891), Section 2(c).

**Wilderness Study Area (WSA):** A roadless area or island that has been inventoried and found to have wilderness characteristics as described in section 603 of FLPMA and section 2(c) of the Wilderness Act of 1964 (78 Stat. 891). Source for both of these is BLM’s IMP and Guidelines for Lands Under Wilderness Review (December 1979).

**Recreation Management Zones (RMZ):** Subunits within an SRMA managed for distinctly different recreation products. Recreation products are comprised of recreation opportunities, the natural resource and community settings within which they occur, and the administrative and service environment created by all affecting recreation-tourism providers, within which recreation participation occurs.

**Special Recreation Management Area (SRMA):** A public lands unit identified in land use plans to direct recreation funding and personnel to fulfill commitments made to provide specific, structured recreation opportunities (i.e., activity, experience, and benefit opportunities). Both land use plan decisions and subsequent implementing actions for recreation in each SRMA are geared to a strategically identified primary market—destination, community, or undeveloped.

Comment #65

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0145	STEWART	JOHN	CALIFORNIA ASSOCIATION OF 4 WHEEL DRIVE CLUBS

The DRMP indicates that travel will be on designated routes. However, the DRMP fails to provide definitions of the terms involved with travel management. As such, the

## 5.2 Public Comment Process

following terminology should be included within the glossary:

Route - any motorized, non-motorized, or mechanized transportation corridor. Corridor may either be terrestrial or a waterway. "Roads", "Trails" and/or "ways" are considered routes.

Road - as used herein (a linear route), a transportation facility used primarily by vehicles having four or more wheels, documented as such by the owner, and maintained\*\* for regular and continuous use.

Roadside - a general term denoting the area adjoining the outer edge of the road.

Shoulder - the portion of the roadway contiguous to the travel way for accommodation of stopped vehicles.

Trail (interagency definition) - linear route managed for human powered, stock, or off highway vehicle forms of recreation or for historic or heritage values. Trails are not generally managed for use by four wheel drive or high clearance vehicles.

\*\*Maintenance - the work required to keep a facility in such a condition that it may be continuously utilized at its original or designed capacity and efficiency, and for its intended purpose.

Designated "roads" must be "routes" that can be maintained "...in such a condition that it may be continuously utilized at its original or designed capacity and efficiency, and for its intended purpose." One might conclude that only major, regularly maintained routes qualify as a "road" under this guidance.

Designated "trails" must be "routes" that are "...not generally managed for use by four wheel drive or high clearance vehicles".

RESPONSE: We have considered your comment and have updated the glossary to include definitions of terms in reference to Transportation and Public Access, in accordance with BLM policy and terminology (Roads and Trails Terminology, DOI BLM, November 2006):

Road: A linear route declared a road by the owner, managed for use by low-clearance vehicles having four or more wheels, and maintained for regular and continuous use.

Route: "Routes" represents a group or set of roads, trails, and primitive roads that represents less than 100% of the BLM transportation system. Generically, components of the transportation system are described as routes.

Trail: A linear route managed for human-powered, stock, or off-highway vehicle forms of transportation or for historical or heritage values. Trails are not generally managed for use by four-wheel drive or high-clearance vehicles.

Comment #17

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0150	VOLKER	STEPHAN C.	LAW OFFICES OF STEPHAN C. VOLKER

ES-57. The DEIS states: Alternative E identifies McCain Valley West as Class IV to accommodate renewable energy development.

RESPONSE: In response to public input and concern over the VRM classification of McCain Valley West, this area under the proposed plan alternative (Alternative E [preferred] in the DRMP/DEIS) in the PRMP/FEIS has been reclassified as Class III. The Cottonwood and Lark Canyon campgrounds have been reclassified as VRM Class IV to reflect the developed state of the areas. The statement referenced in the comment has been deleted from the document.

Comment #21

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0151	WEINER	TERRY	DESERT PROTECTIVE COUNCIL

There are some problems with some of the tables in the document. The use of Xs in boxes in several tables, denoting decisions and/or actions by various alternatives, do not seem to be consistent. As a noteworthy example, in Table ES-1, Xs are lacking in some of the boxes and the result is an inconsistency between this table and statements made in other parts of the document.

RESPONSE: The inconsistency between the Executive Summary and the body of the document has been resolved.

5.2 Public Comment Process

Comment #27

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0151	WEINER	TERRY	DESERT PROTECTIVE COUNCIL

There is a sentence at the top of page ES-38 which says; "The development of renewable sources of energy would reduce the use of irreversible/irretrievable energy resources." That sentence needs clarification.

RESPONSE: The statement cited has been revised in Chapter 4 and the Executive Summary to read as follows: "The development of renewable sources of energy could reduce the irreversible/irretrievable commitment of nonrenewable energy resources."

Comment #30

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0151	WEINER	TERRY	DESERT PROTECTIVE COUNCIL

Table 2-2 is confusing. Do you really mean to indicate that tree removal would be prohibited in the no action alternative, but allowed in Alternative C.

RESPONSE: Alternative B, C, D, and E would prohibit the removal of standing trees except for fire management or health and safety reasons, as provided in the second management action in Table 2-2 of the DRMP.

Comment #34

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0151	WEINER	TERRY	DESERT PROTECTIVE COUNCIL

...the table [2-4] indicates that you will not require seasonal closure to vehicles, where appropriate, in sensitive areas or critical habitat in Alternative C. We suggest you change that to a more protective management action in Alternative C.

RESPONSE: The second to last management action in Table 2-4 of the DRMP would require that "critical habitat and recovery areas would be closed to motorized use" under Alternative C which represents a more protective management action.

Comment #37

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0155	GROSSGLASS	MEG	OFF-ROAD BUSINESS ASSOCIATION

In the Executive Summary page ES-7 the Visual Resource Management Allocations table states in Alternative E there will be 0 acres classified as VRM IV yet in on page ES-57 and in Section 2 page 52 it states that the McCain Valley West will be classified as VRM IV to accommodate renewable energy development.

RESPONSE: The table in the Executive Summary has been revised to represent the number of acres proposed for VRM Class IV in Alternative E.

Comment #38

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0155	GROSSGLASS	MEG	OFF-ROAD BUSINESS ASSOCIATION

Page ES-8 the Special Designation table says that in Alternative E ACEC acres will be reduced by approximately 12,000 acres compared to what is currently set aside for ACEC in Alternative A. If you look at the maps that visually display the ACECs by alternative it is obvious that the amount of ACECs in Alternative E (figure 2-5) is far greater than the amount in Alternative A (figure 2-1). Which section is correct?

RESPONSE: The acreages presented on page ES-8 and Table 2-10 of the DRMP/DEIS are correct. Please note that this is also shown visually on Figures 2-1 and 2-5 of the DRMP/DEIS; however, Figure 2-5 is depicted at a larger scale than Figure 2-1 which may account for the concern expressed by the commenter. See Table 2-9 and Maps 2-6 through 2-9 of the PRMP/FEIS for the current depiction of this information.

Comment #41

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0155	GROSSGLASS	MEG	OFF-ROAD BUSINESS ASSOCIATION

In the Executive Summary page ES-13 the Routes of Travel table it states that in the "Lark Canyon Recreation Zone routes limited to 40" or less would be 10 feet wide or 5 feet on each side of center." This table does not have this being proposed for Alternative E yet on page 2-113 it states that Alternative E will include widening these trails.

5.2 Public Comment Process

RESPONSE: The ES summary has been revised to match the potential decisions listed on page 2-113 of the DRMP/DEIS. In addition, the intent with regards to the Lark Canyon OHV Area was to identify a pull-off width that provided the ATVs the ability for safe passing along the route, not to widen the trail to 10-feet. The text (see Table 2-18 of the PRMP/FEIS) has been revised to the following for clarification: "Lark Canyon OHV Area, routes limited to ATVs 40" or less in size would have an average width of 5 feet. Vehicles may pull off of the route a maximum of 40 inches to allow for safe passing."

Comment #82

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0156	SCHWARTZ	WILLIAM	STEPHENSON WORLEY GARRATT SCHWARTZ GARFIELD & PRAIRIE

The RMP/EIS provides only a cursory explanation for downgrading existing Visual Resource Management ("VRM") classifications in McCain Valley and Airport Mesa areas.

RESPONSE: An update of the existing inventory was conducted with a specific focus on the areas that had known high use since the MFP was developed. A range of alternatives was developed based on the results of the inventory update and the priorities identified under which these lands would be managed, consistent with BLM mandate for multiple-use and sustained yield. As indicated in Chapter 4, VRM Class IV would provide an allowance for visual contrast in any future proposals in McCain Valley West.

Comment #222

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0175	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

Herbicides used intelligently and safely and properly are far less costly in terms of man power resources and financial resources. You must change Alternative C to allow herbicides. You must analyze the impacts of not using herbicides.

RESPONSE: The Record of Decision (ROD) for the California Vegetation Treatment Program was approved by the California State Director on November 7, 1988. The decision states that, "In order to accomplish vegetation treatments on public lands in

California and northwestern Nevada BLM managers will be allowed to utilize chemical methods in addition to current manual, mechanical and prescribed fire methods. The chemicals available for use are those with the following active ingredients: amitrole; asulam; atrazine; bromacil; 2,4-D; 2,4-DP; dalapon; dicamba; diuron; fosamine; glyphosate; hexazinone; picloram; simazine; tebuthiuron and triclopyr.”

The ROD is supported by the Final Environmental Impact Statement entitled “California Vegetation Treatment” (August 1988), included an alternative which prohibited the use of herbicides when managing vegetative resources.

Given that the California State Director has already made the decision to use herbicides in managing vegetative resources, Alternative C of the PRMP/FEIS has been revised accordingly.

Comment #223

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0175	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

"Visual Resource Management Allocations Page ES-7

Visual Resource Management (VRM) Class I (acres)	62,296	62,296	62,296	62,296	62,296
VRM Class II (acres)	40,758	41,237	41,961	13,720	32,875
VRM Class III (acres)	0	724	0	0	724
VRM Class IV (acres)	0	0	0	27,038	0

RESPONSE: The inconsistencies between this data and Table 4-9 in the DRMP/DEIS have been corrected in the PRMP/FEIS. Please also note that in response to public input and concern over the VRM classification of McCain Valley West, this area under the proposed plan alternative (Alternative E [preferred] in the DRMP/DEIS) in the PRMP/FEIS has been reclassified as Class III.

Comment #226

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0175	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

5.2 Public Comment Process

Your statement that this would "result in no effect to special status species" should be reconsidered. When you review Alternative E (page ES-56) you make the better statement which is "This would result in beneficial effects to special status species." Please change this statement for C.

RESPONSE: This revision was made as recommended.

Comment #229

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0175	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

"Other related plans (BLM and non-BLM), which the ESDC RMP will be consistent with to the maximum extent possible, are:..." We have concerns about how you will address these related plans which are required for consistency... How will consistency be achieved when the [BLM South Coast RMP] may not be completed for three or four years.

RESPONSE: Consistency will be achieved by implementing BLM planning regulations (43 CFR 1610.3-2 Consistency Requirements), which state the following: "(a) Guidance and resource management plans and amendments to management framework plans shall be consistent with officially approved or adopted resource related plans, and the policies and programs contained therein, of other Federal agencies, State, and local governments and Indian tribes, so long as the guidance and resource management plans are also consistent with the purposes, policies and programs of Federal laws and regulations applicable to the public lands,..."

In reference to the South Coast RMP, which is currently under revision, the ESDC RMP was drafted to be consistent with the existing plan. Chapter 1 was revised to cite the publication date for the existing South Coast RMP as 1994 and currently undergoing revision.

Comment #5

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0220	ANONYMOUS		

"Alternative E identifies McCain Valley West as Class IV to accommodate renewable energy development."

RESPONSE: In response to public input and concern over the VRM classification of McCain Valley West, this area under the proposed plan alternative (Alternative E [preferred] in the DRMP/DEIS) in the PRMP/FEIS has been reclassified as Class III and the quoted sentence removed from the document. The Cottonwood and Lark Canyon Campgrounds have been reclassified as VRM Class IV to reflect the developed state of the areas.

**Rationale Codes**                      131 NEPA

Comment 217

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0174	KLAASEN	LARRY B.	SIERRA CLUB, SAN DIEGO CHAPTER

General comment on the layout of the DEIS, it is very difficult to evaluate each area because it involved going back and forth between Chapters 2, 3, and 4. Information was distributed piecemeal in the various chapters, and at times were inconsistent between the chapters.

RESPONSE: Appendix F-4 of BLM's Land Use Planning Handbook (H-1601-1, Appendix F, page 14) provides the outline or format for both Draft and Final RMP/EISs. This format integrates the requirements of both the BLM Planning Regulations (43 CFR Part 1600) and the CEQ Regulations for Implementing the Procedural Provisions of the NEPA (40 CFR Parts 1500-1508).

**Rationale Codes**                      161 Previous Resource Management Plans &

Comment #4

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0220	ANONYMOUS		

Paragraph 3: "The development of renewable sources of energy would reduce the use of irreversible/irretrievable energy resources." ...Possibly true, but not necessarily true.

5.2 Public Comment Process

RESPONSE: The statement cited has been revised in Chapter 4 and the Executive Summary to read as follows: "The development of renewable sources of energy could reduce the irreversible/irretrievable commitment of nonrenewable energy resources."

**Rationale Codes** 237 Paleontological Resources

Comment #245

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0185	WELLS	MICHAEL L.	DEPARTMENT OF PARKS AND RECREATION, STATE OF CALIFORNIA

Appendix B Laws, Regulations, and Executive Orders. The authorities under which the BLM manages paleontological resources listed in 2.3.10 (page 2-49) are not included in this appendix.

RESPONSE: Appendix B only lists Laws, Regulations and Executive Orders. The three acts listed on page 2-49 are in Appendix B. All others are BLM manuals, handbooks and secretarial orders.

**Rationale Codes** 370 Cultural Resources

Comment #247

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0185	WELLS	MICHAEL L.	DEPARTMENT OF PARKS AND RECREATION, STATE OF CALIFORNIA

Section 3.9, Table 3-5: Cultural Resources. Table 3-5 should be relabeled "Summary of Cultural Resources Previously Recorded within the Planning Area." This table does not reflect the totality of cultural resources located within the Planning Area.

Section 3.9, Figure 3-9: Cultural Resources. Blue areas identify "Surveyed Areas." These areas have only been surveyed incompletely and often at records-only overview level. It is erroneous to state that they have been Surveyed.

RESPONSE: Table 3-5 (now Table 3-6 in the PRMP/FEIS) has been renamed as "Cultural Resources Recorded Within the Planning Area." Figure 3-9 has revised and corrected to accurately display the areas that have been surveyed on BLM-administered lands within the Planning Area (see Map 3-8 in the PRMP/FEIS).

Comment #248

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0185	WELLS	MICHAEL L.	DEPARTMENT OF PARKS AND RECREATION, STATE OF CALIFORNIA

Section 3.9.1: Site Significance. A page from the Paleontology discussion (Page 3-86) is mistakenly included in the Cultural Resources section.

RESPONSE: We have been unable to locate this inconsistency in the master paper and digital copies we have but will make every effort to ensure there are no errors of this sort in the PRMP/FEIS.

**Rationale Codes**                      372 American Indian Values

Comment #246

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0185	WELLS	MICHAEL L.	DEPARTMENT OF PARKS AND RECREATION, STATE OF CALIFORNIA

Section 2.3.9.2: Goals and Objectives. Include goal: "Work with Native American communities to identify cultural resources of critical concern to Native Peoples."

RESPONSE: BLM has consulted with and will continue to consult with the tribal entities located or involved in the Planning Area, in accordance with BLM policy, federal laws, regulations, and executive orders as identified in Section 2.3.9 and Appendix B. Section 5.1.3 of the DRMP/DEIS details the interrelationships and the consultation process BLM undertakes with tribal entities within the Planning Area. This section has been revised to further explain and clarify the process undertaken through the preparation of the plan.

**Rationale Codes**                      373 Historical

Comment #249

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0185	WELLS	MICHAEL L.	DEPARTMENT OF PARKS AND RECREATION, STATE OF CALIFORNIA

Section 3.9.5: Historically Significant Trails System. Discussion of the San Diego and San Antonio Mail Route is in error. The third sentence should read, "The route entered the Planning Area in the south, east of where the community of Ocotillo is today." The sixth sentence should read, "At Oriflamme Canyon, one leg of the route left S-2 and proceeded up the mountains to Cuyamaca and on to San Diego." The seventh sentence should read, "Passengers dismounted from the stages for this portion of the route and proceeded on to San Diego." The eighth sentence should be deleted. The "Jackass Mail" was a label attached to the mail line as ridicule by rival cities in the 1860s and for popularization by researchers in the 1930s.

The discussion of Butterfield Mail is in error. The fifth sentence should read, "The Butterfield followed the San Antonio and San Diego Mail in the southern portion of the Planning Area." The sixth sentence should read, "the Butterfield stage continued north to Warner Spring and on to Los Angeles, whereas the San Antonio and San Diego Mail also went west up Oriflamme Canyon to San Diego."

RESPONSE: Section 3.9.5.1 of the DRMP/DEIS has been revised as requested, with the exception of the first suggested revision. The San Diego and San Antonio Mail Route enters the Planning Area northwest of Ocotillo, and this revision has been made.

**Rationale Codes**                      500 Recreation: General/Multiple/Other

Comment #260

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0202	SCHOECK	ARNOLD F.	

Figure 3-20 confirms the existence of the McCain Valley SRMA and disproves the statement that no SRMA exists in the planning area.

RESPONSE: We appreciate your pointing out this error. Figure 3-20 has been revised to appropriately label this area as the McCain Valley Resource Conservation Area in accordance with the McCain Valley Resource Conservation Recreation Activity Management Plan (1979) (see Map 3-19 in the PRMP/FEIS). In addition, the boundary of the Conservation Area has been revised to be consistent with the boundary depicted in the RAMP. The text in Section 3.17 of the DRMP/DEIS was also revised to accurately label this area.

**Rationale Codes**                      641 Wind Energy

Comment #117

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0171	TISDALE	DONNA	BOULEVARD PLANNING GROUP

Despite the statement in the DRMP’s forward regarding the public scoping process specifically mentioning renewable energy production, transcripts of those two meetings do not include any comment regarding the desire for, or the potential for, renewable energy production.

RESPONSE: The potential for renewable energy production was identified by BLM during internal scoping as required by BLM Land Use Planning Handbook H-1601-1 and the national Energy Policy Act of 2005.

**Section: Alternatives/Options**

**Action Code**                      22000 Alternatives

**Rationale Codes**                      4 Clarity of Information/Presentation

Comment #100

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0167	FILNER	BOB	U.S. HOUSE OF REPRESENTATIVES

Alternatives B, D, and E ... These Alternatives would downgrade the Visual Resource Management (VRM) classifications for Bureau of Land Management lands near Boulevard and Jacumba, which is adjacent to Wilderness Areas, Wilderness Study Areas, and Areas of Critical Concern. The VRM downgrades would present an unwarranted and landscape altering visual contrast...

RESPONSE: An update of the existing inventory was conducted with a specific focus on the areas that had known high use since the MFP was developed. A range of alternatives was developed based on the results of the inventory update and the priorities identified under which these lands would be managed, consistent with BLM mandate for multiple-use and sustained yield. As indicated in Chapter 4, VRM Class IV would provide an allowance for visual contrast in any future proposals in McCain Valley West.

## 5.2 Public Comment Process

The Wilderness Management Policy (DOI BLM 1981b), Chapter II Management Policy for BLM-administered Wilderness, B.9 Buffer Zones and Adjacent Lands, states "No buffer zones will be created around Wilderness Areas to protect them from the influence of activities on adjacent land. The fact that non-wilderness activities or uses can be seen or heard from areas within the Wilderness shall not, of itself, preclude such activities or uses up to the boundary of the Wilderness Area.

When activities on adjacent lands are proposed, the specific impacts on those activities upon the wilderness resource and upon public use of the wilderness area will be addressed in environmental assessments or environmental impact statements as appropriate. Mitigation of impacts from outside wilderness will not be so restrictive as to preclude or seriously impede such activities."

Comment #250

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0185	WELLS	MICHAEL L.	DEPARTMENT OF PARKS AND RECREATION, STATE OF CALIFORNIA

Table ES-1, page ES-7: Wilderness and Wilderness Planning Area Management. Under this section of Table ES-1 no alternatives are "X'ed" for two important categories: 1) "Acquire inholdings from willing owners.", and 2) "Perform restoration treatments where damage has occurred or where it will reduce vehicle incursions." These two management items should be included in the Preferred Alternative (E).

RESPONSE: The Special Designations section of Table ES-1 has been updated to correctly summarize the management actions in Table 2-9 of the DRMP/DEIS.

### Section: Alternatives/Options

**Action Code** 22100 Scope, Issues That Should/Should Not Be Addressed

**Rationale Codes** 3 Adequacy of Analysis

Comment #191

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0122	VU	LENNY C.	SAN DIEGO SPORTS COALITION

There appears to be "scope creep" with the addition of Windmills/Geothermal to the document

RESPONSE: The potential for renewable energy production was identified by BLM during internal scoping as required by BLM Land Use Planning Handbook H-1601-1 and the national Energy Policy Act of 2005. The scope of the document may be broadened as new issues are identified. BLM policy is such that scoping for an EIS-level analysis is an ongoing process, and does not end until just before the draft EIS is submitted for printing.

**Rationale Codes**                      4 Clarity of Information/Presentation

Comment #118

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0171	TISDALE	DONNA	BOULEVARD PLANNING GROUP

Scoping testimony at the Sept. 9, 2004 Eastern San Diego County DRMP meeting (page 43 of transcript) stated that: "...this new plan needs to address and inform the public as to how the area has been or will be added to the CDCA and how the plan will be reconciled with the CDCA guidelines".

RESPONSE: When The MFP was approved in 1981, consideration was being given to adding the Eastern San Diego County Planning Area to the CDCA. This was never implemented and it is not anticipated at this time, therefore this RMP is developed as a stand-alone plan. If Congress were to add Eastern San Diego County Planning Area to the CDCA in the future, a land use plan amendment may be required to resolve any incompatibilities between CDCA guidelines and the approved plan for Planning Area.

**Rationale Codes**                      40 American Indians/Tribes

Comment #92

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0160	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

Nowhere in your discussion did we see any notice of communications with the various Indian tribes about their plans to add at least 100 and maybe as many as 150 more wind turbines in that area and what impact that might have on the planning area.

5.2 Public Comment Process

RESPONSE: Facilities (such as wind turbines) on adjacent non-BLM administered lands would not affect visual resource management decisions on those BLM lands in the Planning Area.

**Rationale Codes** 100 Laws, policies

Let. # LAST NAME FIRST, MI ORGANIZATION NAME

Comment #89

EC-0160 THOMETZ MICHAEL C. MOUNTAIN EMPIRE RESOURCES  
INFORMATION TASKFORCE

It appears that McCain Valley has been selected in advance. Does this not violate the National Energy Policy Act? Please explain if it does not violate the Act.

RESPONSE: BLM is required to identify areas having potential for development of renewable energy in an RMP/EIS development process (BLM H-1601-1, App.C, II, Section E, item 8). As shown in Figure 3-15 of the DRMP/DEIS, McCain Valley is one of those areas (see Map 3-14 of the PRMP/FEIS).

**Rationale Codes** 160 Agency Rules, Plans, Policies

Comment #195

Let. # LAST NAME FIRST, MI ORGANIZATION NAME

EC-0134 JOHNSTON CHRIS

For whatever acreage that is surrendered for wind generation, comparable (equivalent or some percentage) acreage containing forested lands should be purchased by industry and set aside by the BLM.

RESPONSE: This RMP would not result in any decisions that would require compensation. Approval of wind energy facilities is an implementation-level decision, rather than an RMP-level decision, and will require site-specific NEPA analysis before any of these actions could be approved. The NEPA analysis would require evaluation of impacts to biological resources prior to site-specific BLM use authorization approval and identify any appropriate mitigation, which may include habitat compensation, at that time.

**Section: Alternatives/Options**

**Action Code**      22200 Alternative Development Method

**Rationale Codes**                      4 Clarity of Information/Presentation

Comment #218

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0174	KLAASEN	LARRY B.	SIERRA CLUB, SAN DIEGO CHAPTER

1. Alternative C should be the Preferred Alternative. The 5 Alternatives are not flexible enough to create an effective RMP. A new Alternative should be prepared that takes selections from the various alternatives to create a new Alternative.

RESPONSE: Alternative E (Preferred) was developed by taking components from or combining components of the other Alternatives to construct a complete plan alternative. The Alternatives presented in the DRMP were designed to provide a reasonable range of management options.

**Section: Alternatives/Options**

**Action Code**      22610 Preferred Alternative E

**Rationale Codes**                      4 Clarity of Information/Presentation

Comment #43

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0156	SCHWARTZ	WILLIAM	STEPHENSON WORLEY GARRATT SCHWARTZ GARFIELD & PRAIRIE

There is no analysis explaining why the Preferred Alternative is superior to the four other Alternatives discussed in the documents.

RESPONSE: The process of development of the DRMP/DEIS included developing and analyzing land use planning decisions for four different alternatives that represented a range and mix of resource use and resource protection actions. Based on the results of the impact analysis presented in Chapter 4 of the DRMP/DEIS, a fifth alternative, Alternative E (Preferred), was developed and represents what BLM perceives as the best mix of RMP-level decisions from the other four alternatives to satisfy the multiple use and sustained yield mandate of FLPMA.

**Rationale Codes** 160 Agency Rules, Plans, Policies

Comment #270

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0220	ANONYMOUS		

Were the elements of "Preferred Alternative E" selected to satisfy the demands of administrators? National Director Jim Hughes? State Director Michael Pool? Steven Borchard? Vicki Wood? Were the "preferred" elements selected by ReCon Inc., the contract authors of the Draft proposal?

RESPONSE: FLPMA requires that BLM manages resources to meet the multiple use and sustained yield mandate. The BLM Planning Regulations (43 CFR 1610.5-1(b)) state that the authority to approve the RMP is delegated to the State Director. BLM Planning Handbook Appendix C provides requirements for the RMP/EIS content. The BLM ID Team, consisting of field office, district office, state office, and Washington office staff, define what the preferred alternative is to be.

## Section: Alternatives/Options

**Action Code** 22640 Alternative C

**Rationale Codes** 4 Clarity of Information/Presentation

Comment #98

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0160	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

Can you clarify what would be done to improve staging areas for Alternative C?

RESPONSE: In developing a reasonable range of alternatives, under Alternatives B and C, staging areas and access to Special Designation Areas would not be improved or expanded from their current condition (see Table 2-9 of the DRMP/DEIS). Alternatives D and E (Preferred) do provide for the expansion of the staging areas.

**Action Code**      30200 Monitoring, Inventories, Mapping, GIS

**Rationale Codes**                      4 Clarity of Information/Presentation

Comment #83

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0156	SCHWARTZ	WILLIAM	STEPHENSON WORLEY GARRATT SCHWARTZ GARFIELD & PRAIRIE

We must state that the graphics, particularly the maps, in the RMP/EIS are of such small size and large scale as to make accurate calculation of the location of affected lands and adjoining privately-owned lands which may be impacted extremely difficult...

RESPONSE: The calculations were conducted using GIS software to ensure accuracy. To ease the viewing of the data on the graphics, all figures in the PRMP/FEIS have been increased to 11x17 in size and are now located just after the appendices in the PRMP/FEIS.

**Rationale Codes**                      370 Cultural Resources

Comment #50

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0144	COYLE	COURTNEY ANN	HELD-PALMER HOUSE

Cultural Resources. Figure 3-9 depicts the areas within the Plan that have been surveyed and shows that the vast majority of the Plan Area has NOT been surveyed. My client requests that a schedule for surveying with qualified Native American monitors be made part of the RMP. Moreover, Appendix G, providing a chart of the recorded cultural resources on BLM-administered lands in the Plan Area shows that some places have NOT been re-surveyed in over 30 years. A schedule for re-surveying and site monitoring with qualified Native American monitors also should be included as part of the RMP.

RESPONSE: Alternatives B through E include management actions that would maintain current cultural resource data in a geographic information system (GIS) format. The inventory would include a prioritized list L (high/medium/low sensitivity) of areas for future inventory-based on sensitivity and the likelihood of significant, unrecorded sites. Inventory strategies for unsurveyed areas would continually be refined. BLM would continue to manage spiritually significant and traditional cultural properties in consultation with Native American tribes, accommodate tribal access to spiritually significant and traditional cultural properties, and prevent physical damage or intrusions that might impede their use by religious practitioners. Surveys would continue to be

prioritized and scheduled as budget becomes available. BLM has consulted and will continue to consult with the tribal entities located or involved in the Planning Area, in accordance with BLM policy.

## Section: Natural Resources Management

### Action Code 31100 Air Quality Management

Rationale Codes 3 Adequacy of Analysis

Comment #216

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0173	BELENKY	LISA	CENTER FOR BIOLOGICAL DIVERSITY

It omits from the DRMP/DEIS any discussion or calculation of the greenhouse gas emissions from the activities on BLM-administered land within the planning area. Furthermore, the DRMP/DEIS fails to discuss the environmental impacts from the greenhouse gas emissions, most specifically climate change, that would occur under each RMP alternative.

RESPONSE: The California Global Warming Solutions Act of 2006 (AB 32) is one of the first laws in the United States that mandates regulation of greenhouse gases at a state level. In April the United States Supreme Court ruled that the EPA has the authority to regulate greenhouse gases under the Clean Air Act (Massachusetts vs. EPA, 05-1120). California is in the process of implementing AB 32. This includes the Greenhouse Gas Inventory and Mandatory Reporting portion of the Act. Preliminary analysis of Forest and Rangeland emissions indicates that these sources represent approximately 1.2% of the total statewide 1990 greenhouse emissions and concludes that statewide there will be little change from 1990 levels (California Air Resources Board, May 23, 2007). Of the sources evaluated in this Inventory the category of Forest and Rangeland emissions is the most similar to conditions and activities occurring on BLM-administered lands within the Planning Area.

Quantities of greenhouse gas emissions generated by use and maintenance of BLM-administered lands in the Planning Area under Alternatives B through E are anticipated to be equal to or less than those generated under the existing Plan (Alternative A). No new quantifiable generation of greenhouse gas would occur as a result of the RMP-level decisions in this plan; total miles of route designations are the

same as current levels and motorized miles are less or the same in all alternatives. It is assumed that use of the roads on BLM-administered lands in the Planning Area would be the same under Alternatives B through E as under the existing Plan (Alternative A). Furthermore, under all Alternatives (A through E) vegetation enhancement (e.g. restoration of illegal trespass, invasive plant removal, and the elimination of grazing under the Preferred Alternative) may increase the long-term quality or quantity of vegetation which acts as a carbon sink to decrease net emissions. All alternatives (A through E) evaluate the potential for future development of renewable energy resources. The development of renewable sources of energy could reduce the irreversible/irretrievable commitment of nonrenewable energy resources, particularly greenhouse gas generating energy sources. Development of renewable energy resources is an implementation-level decision which would require a site-specific NEPA process before such an action could be approved.

The following information was added to Section 3.2.1: “Current trends of global climate change include temperature increases, and may also include changes in rainfall patterns. Statewide average temperatures are anticipated to increase by between 3 and 10.5 °F by 2100. Total annual precipitation and statewide rainfall patterns are anticipated to change little over the next century; however, it is also possible that the intensity and frequency of extreme storm events could increase (State of California 2006b).”

In order to address potential impacts of climate change on resource management, the discussion above has been added to Section 4.2 and a discussion of potential effects from climate change, particularly extended periods of drought has been added to Unavoidable Adverse Impact Sections 4.4.4 (Water Resources), 4.5.5 (Vegetation Resources), 4.6.7 (Wildlife Resources), 4.7.3 (Special Status Species), 4.8.5 (Wildland Fire), and 4.14.2 (Livestock Grazing) of the DRMP/DEIS.

**Rationale Codes**                      530 Off Highway Vehicle Use (OHV)

Comment #9

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0221	BLAZEJ	NOVA	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

While the air emissions are estimated to be the same for all alternatives (p. 4-6), areas open to Off-Highway Vehicles (OHV) vary among alternatives. This is not accounted for in emissions estimates. The FEIS should document any potential changes in air

emissions from excluding OHV use under Alternative C.

RESPONSE: Emissions from OHV use depend on hours/mileage driven down any road rather than the use allocations. It is anticipated that the reduced available acreage under Alternative C would not reduce the amount of use, but would confine the demand and use to a smaller area.

## Section: Natural Resources Management

### Action Code 31200 Water/Watershed Management

Rationale Codes 100 Laws, policies

Comment #48

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0156	SCHWARTZ	WILLIAM	STEPHENSON WORLEY GARRATT SCHWARTZ GARFIELD & PRAIRIE

The sole source of water for Jacumba is groundwater. As such, any intrusion into the watertable may negatively impact the entire basin. Such impacts would result in severe social, environmental and economic hardship to the citizens of Jacumba. The RMP/EIS fails to analyze or even discuss impacts to the watertable as a result of the proposed changes.

One objective of the RMP/EIS is to make "groundwater, where present, available for beneficial use on public lands" (RMP/EIS pg. 2-11). The BLM identifies an environmental impact common to all alternatives as "increasing the use of surface and groundwater." (RMP/EIS Table 2-22.)

RESPONSE: There are use authorizations that could draw down on the water table as identified in Section 4.4.4, such as wells for grazing or recreation purposes. Any of these uses would be implementation level decisions and addressed on a case-by-case basis in a site-specific NEPA analysis. In addition, as stated in Section 3.4.2 of the DRMP/DEIS, the County of San Diego's Department of Environmental Health Land Use Program regulates the design, construction, maintenance, and destruction of water wells throughout San Diego County to protect San Diego County's groundwater resources. Please also note, as stated in Section 2.3.4, BLM has no direct authority over the groundwater. Rather, the groundwater resource is managed by the California State Water Resources Control Board (SWRCB) and California Department of Water Resources (DWR). BLM works in cooperation with SWRCB and



## Section: Natural Resources Management

### Action Code 31220 Buffers, Riparian

Rationale Codes 4 Clarity of Information/Presentation

Comment #220

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0174	KLAASEN	LARRY B.	SIERRA CLUB, SAN DIEGO CHAPTER

In riparian areas, what is the difference between "avoidance" and "exclusion" areas?

RESPONSE: The definitions of avoidance and exclusion areas have been added to Chapter 2 and the glossary.

## Section: Natural Resources Management

### Action Code 31400 Geology and Cave and Karst Resources

Rationale Codes 252 Air Quality

Comment #10

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0221	BLAZEJ	NOVA	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In addition, asbestos-bearing ultramafic rocks are found in at least 44 of California's 58 counties. Disturbance of rock and soil that contains asbestos can result in the release of asbestos fibers to the air and exposure to the public. Asbestos is a known human carcinogen. The Draft EIS does not indicate whether naturally occurring asbestos (NOA) has been identified on BLM-managed lands within the Planning Area. We raise this concern because of the potential for NOA exposure to OHV users.

RESPONSE: BLM records do not show that asbestos has been found within the planning area. The model for mineralization does not appear to be present based on the geology of the area. If local deposits are found as a result of project site specific analyses, BLM will mitigate activity to reduce or eliminate hazards to public and wildlife health and safety.

**Section: Natural Resources Management****Action Code** 32100 Ecosystem Function**Rationale Codes** 335 Habitat/Vegetation Composition

Comment #11

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0221	BLAZEJ	NOVA	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

This RMP will be in place for 15-20 years and will serve as the baseline for other planning and implementation documents for projects in the area. Therefore, it is important to establish a baseline record of the current ecological situation including the vegetation index. Recommendations: The FEIS should provide a more detailed assessment of existing ecological conditions, including habitat values and functions, as well as a vegetation index that determines rangeland health, as this should form the basis of grazing management decisions. Given that the project will be reliant on adaptive management to respond to changes in wildlife impacts and vegetation and soils impacts, the FEIS should provide a monitoring timeline, identify a funding source, and include a description of how the results will be used to inform future adaptive management plans.

RESPONSE: Part of the RMP process is to identify Rangeland Health Standards. These are presented in Section 2.3.1 of the DRMP/DEIS. In addition, Section 2.3.14.5 presents the Rangeland Guidelines for Grazing Uses by Alternative and the Criteria for Classifying Allotments as Ephemeral. Based on the allotment evaluations, the preferred alternative proposes to make all lands within the Planning Area unavailable for livestock grazing. In accordance with 40 CFR 1505.2(c), a monitoring and enforcement program will be included in the ROD.

**Section: Natural Resources Management****Action Code** 33000 Wildlife/Animals Management**Rationale Codes** 352 Specific Animal Species

Comment #176

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0090	POLINSKY	MARK	

I have personally observed Golden Eagles in this area since 1978 and as recently as 2005. Wind turbines will severely impact any chances they have for the Golden Eagle population in San Diego County to remain stable.

RESPONSE: Approval of wind energy facilities is an implementation-level decision, rather than an RMP-level decision, and will require site-specific NEPA analysis before any of these actions could be approved. The NEPA analysis would require evaluation of impacts to raptors, including the golden eagle, prior to site-specific BLM use authorization approval and identify any appropriate mitigation.

## Section: Natural Resources Management

**Action Code** 33300 Wildlife Structures (Ponds, Waterholes,

**Rationale Codes** 4 Clarity of Information/Presentation

Comment #254

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0186	RICHARDSON	CHRIS E.	

1. What is the source of money used by the BLM to develop water sources and water storage to benefit wildlife?
2. How many such water sources and storage facilities have been developed in the past five years, and how much money was spent for these projects and their maintenance?
3. How many projects still contain water?

RESPONSE:

1. Wildlife waters are normally paid for and managed by California Department of Fish and Game or special user groups.
2. BLM records do not indicate the development of any range improvements within the last 5 years.
3. Several are known to currently contain water. Monitoring of range improvements and wildlife water sources is conducted as staffing and funding allow.

**Section: Natural Resources Management**

**Action Code**      33500 Special Status Animal Species

**Rationale Codes**            160 Agency Rules, Plans, Policies

Comment #231

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0175	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

While we appreciate the listing for Federal State and BLM, we urge you to obtain the list from the County of San Diego to insure you have a complete list. We would also recommend that you consult with the Conservation Biology Institute for their list.

RESPONSE: BLM will continue to coordinate with San Diego County in regards to the 153 sensitive species proposed for coverage in the East County MSCP and will continue to communicate with other entities, as the need or opportunity arises. BLM policy is that BLM management actions focus on federally listed, state listed, and BLM-sensitive species, including Peninsular bighorn sheep and quino checkerspot butterfly; however, BLM does manage the BLM-administered public lands to conserve general wildlife habitat values.

**Section: Natural Resources Management**

**Action Code**      33510 Bighorn Sheep

**Rationale Codes**            4 Clarity of Information/Presentation

Comment #135

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0173	BELENKY	LISA	CENTER FOR BIOLOGICAL DIVERSITY

...the DRMP/DEIS does not even mention the impact that ORV use has/would have on the bighorn, e.g. via noise.

RESPONSE: The Recovery Plan for Bighorn Sheep of the Peninsular Ranges, California published by USFWS (2000) includes a thorough review and analysis of the research available at the time of publication. This document states that “a variety of human activities such as hiking, mountain biking, hang gliding, horseback riding, camping, hunting, livestock grazing, dog walking, and use of aircraft and off-road vehicles have the potential to disrupt normal bighorn sheep behaviors and use of essential resources, or cause bighorn sheep to abandon traditional habitat.” The

## 5.2 Public Comment Process

literature cited in this document are incorporated in the PRMP/FEIS by reference and Section 4.7.12 of the DRMP/DEIS has been revised to summarize this information. Based on the information provided in the recovery plan, the PRMP/FEIS evaluates the potential for recreational activities to impact this listed species.

### Comment #136

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0173	BELENKY	LISA	CENTER FOR BIOLOGICAL DIVERSITY

...asserts that...the actions proposed in the DRMP would have no cumulative effect on the bighorn. DRMP/DIES at 4-32. ...Without assessing the other past, existing and potential future impacts on the bighorn besides those of the DRMP actions, the BLM cannot possible determine whether the DRMP actions would contribute to some cumulatively significant impact.

RESPONSE: As indicated in Section 2.3.7.2.1, the goals and objectives for each species is to promote population increase and protect habitat and to make sure no adverse modification to habitat occurs. BLM management of the area will further protect critical habitat by expanding the In-Ko-Pah ACEC and all BLM-administered lands would be unavailable for livestock grazing. In addition, critical habitat will be either an exclusion area (from renewable energy) or avoidance area (from all other land use authorizations) under Alternatives B, C, and E.

In addition, any future site-specific proposal (e.g. implementation level decisions) will be subject to Section 7 consultation with USFWS to ensure compliance with both the Endangered Species Act and the RMP-level decisions presented in the approved RMP.

The Recovery Plan prepared for this species was developed in cooperation with BLM, USFS, CDFG, CDPR, and Agua Caliente Band of Cahuilla Indians. Given that these land management entities within the range of the species have agreed to meet the goals and objectives of the Plan, there would be no cumulative adverse effect anticipated from activities on the BLM-administered lands within the Planning Area relating to approved RMP. This information has been added to Section 4.7.6.2 of the DRMP/DEIS.

**Rationale Codes** 340 Specially Listed Species, General/Multiple

Comment #239

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0185	WELLS	MICHAEL L.	DEPARTMENT OF PARKS AND RECREATION, STATE OF CALIFORNIA

Bighorn have also been documented to use the water source in Canebrake, bringing bighorn and cattle face to face, increasing the likelihood of disease transmission into the Carrizo Canyon subpopulation of this endangered species.

RESPONSE: Section 3.7.1.1 has been updated to include reference of the use of the water source in Canebrake by bighorn sheep. Section 4.7.1.2 has been updated as follows: "Alternatives A and D would make all current allotments available to grazing. As bighorn sheep have been documented using the water source developed within the Canebrake allotment, grazing in this area could result in a significant impact to bighorn sheep from contact with livestock."

**Section: Natural Resources Management**

**Action Code** 33520 Quino Checkerspot Butterfly

**Rationale Codes** 4 Clarity of Information/Presentation

Comment #137

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0173	BELENKY	LISA	CENTER FOR BIOLOGICAL DIVERSITY

Only a very small portion of the butterfly's critical habitat is located on BLM-administered land within the planning area, the BLM asserts that there would be no adverse impacts on the butterfly from the DRMP actions.

RESPONSE: Section 4.7.1.1 of the DRMP/DEIS has been revised to include the following: "Given the isolation and lack of access to the BLM-administered lands located in quino checkerspot butterfly critical habitat, and given the level of protection afforded to critical habitat under Alternative E, BLM management activities would not adversely impact quino checkerspot butterfly critical habitat under the proposed action."

## Section: Natural Resources Management

### Action Code 33540 Threatened or Endangered

Rationale Codes 3 Adequacy of Analysis

Comment #62

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0145	STEWART	JOHN	CALIFORNIA ASSOCIATION OF 4 WHEEL DRIVE CLUBS

I have reviewed the Draft RMP prepared by BLM and find it defective in its analysis of alleged recreation impacts on threatened and endangered species. Specifically, the Draft RMP fails to support its claims that various recreational activities (e.g. off-highway vehicle use, camping) pose significant threats to the listed species.

RESPONSE: Section 4.7.1.2 of the DRMP/DEIS states that "...human activities could result in disturbance..." as referenced in the USFWS recovery plan (USFWS 2000) which is the most up-to-date and comprehensive review of literature and information related to the Peninsular bighorn sheep. However, for clarification, the following sentence was added to that section: "Human activities include, but are not limited to, hiking, mountain biking, horseback riding, camping, hunting, dog walking, and use of off-road vehicles (USFWS 2000)."

Rationale Codes 100 Laws, policies

Comment #64

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0145	STEWART	JOHN	CALIFORNIA ASSOCIATION OF 4 WHEEL DRIVE CLUBS

...these same "scientists" and land managers are reluctant... to identify the other threats (e.g., disease, predation) confronting those species.

RESPONSE: Section 4.7.12 of the DRMP/DEIS discusses the potential impacts to Peninsular bighorn sheep from disease due to contact with livestock; potential reduction of water and forage sources from the proliferation of non-native invasive plant species; and a potential increase in predation due to non-native plants providing predator ambush areas.

**Section: Natural Resources Management**

**Action Code 34000 Vegetation Management**

**Rationale Codes** 4 Clarity of Information/Presentation

Comment #95

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0160	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

"Oak woodland: Camping activity beneath oaks could cause soil compaction, which results in decreased water percolation into the soil and lower success of seedlings. Mechanical vegetative management activities (fuel reduction) could result in loss of snags and thinning of trees."

This impact fails to recognize the impact on oak woodlands of grazing activity.

RESPONSE: Section 4.5.3 of the DRMP/DEIS has been revised to add in the potential for grazing activities to result in soil compaction, as well as camping activities. Section 4.5.4 has been revised to specifically identify that Alternatives C and E (preferred) designate all BLM-administered lands unavailable for grazing, thus eliminating the potential for this activity to impact oak woodlands.

**Rationale Codes** 160 Agency Rules, Plans, Policies

Comment #31

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0151	WEINER	TERRY	DESERT PROTECTIVE COUNCIL

To allow collection of some species of cacti and flowering plants and shrubs and not others is too confusing to the general public and the practice would easily lead to trampling of habitat and sensitive species and other abuses. DPC urges BLM EI Centro to prohibit all vegetation gathering except by special permit.

RESPONSE: Section 102(a)(7) of FLPMA mandates that BLM-administered lands be managed for "multiple use and sustained yield". 43 CFR 8365.1-5(b) provides permission of the collection of "reasonable amounts" of plants for non-commercial uses. In order to balance both resource use and resource protection, Section 2.3.5.4.3 of the DRMP/DEIS provides guidance as to what species may or may not be collected and defines reasonable amounts that would be applied to these activities on BLM-administered lands in the Planning Area.

## Section: Natural Resources Management

### Action Code 34100 Wildlife Habitat Management General

Rationale Codes 4 Clarity of Information/Presentation

Comment #26

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0151	WEINER	TERRY	DESERT PROTECTIVE COUNCIL

The Executive Summary of the document refers to range and wildlife management and to "wildlife improvement projects". Please flesh out the particulars of your plans for "wildlife management" in the various alternatives and describe "wildlife improvement projects"

RESPONSE: The following has been added to the glossary: Wildlife improvement projects: these include, but are not limited to the installation of wildlife waters (guzzlers) and habitat restoration. These projects are considered, analyzed, and implemented on a case-by-case basis or as funding becomes available or as applications are received.

Comment #97

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0160	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

"4.7.3.1 Quino Checkerspot Butterfly

Increases in soil nitrogen (from burning fossil fuels, production of fertilizers, and cultivation of nitrogen-fixing crops) could promote invasive non-native plant invasion. Increase in atmospheric carbon dioxide concentration could promote plant growth and photosynthetic rates and increase the chaparral canopy resulting in canopy closure and reduction of habitat favored by the quino checkerspot butterfly. Climate change could contribute to the regional extirpation of populations of quino checkerspot butterfly. Suspicion is that drier winter-spring cycles have altered the host plant availability"

These factors are scientifically accepted. Research is showing that soil nitrogen is having impacts in many areas and the planning area receives nitrogen from the many automobiles in the San Diego area. The impacts of carbon dioxide are also well documented and the subject of substantial research. These issues which are recognized in this section should be discussed throughout the DRMP/DEIS.

RESPONSE: As cited in Section 4.7.3.1 of the DRMP/DEIS, the level of detail included for this species was developed by USFWS as part of the preparation of the Recovery Plan. However, to address this concern, a discussion of potential effects from climate change, such as extended periods of drought, has been added to Unavoidable Adverse Impact Sections 4.4.4 (Water Resources), 4.5.5 (Vegetation Resources), 4.6.7 (Wildlife Resources), 4.7.3 (Special Status Species), 4.8.5 (Wildland Fire), and 4.14.2 (Livestock Grazing) of the DRMP/DEIS.

**Rationale Codes**                    530 Off Highway Vehicle Use (OHV)

Comment #150

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0003	WILSON	M. LYNN	

Lark Canyon was a repository of wildlife ranging from Horny Toads to deer, and bobcats. Presently almost no wildlife is to be found in that area. This drastic change in habitat can only be attributed to OHV traffic.

RESPONSE: As part of this planning process, routes are designated as motorized or non-motorized which will aid in controlling unauthorized OHV traffic by facilitating posting of signs along designated motorized routes. This will allow rangers and law enforcement personnel to better patrol the area and cite infractions.

**Section: Natural Resources Management**

**Action Code**                    34200 Pesticides and Herbicides

**Rationale Codes**                    363 Noxious or Non-native Plants

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0012	HUGHES	BRENDAN	

Comment #163

BLM should have the ability to use herbicide to remove tamarisk in the conservation Alternative.

RESPONSE: The Record of Decision (ROD) for the California Vegetation Treatment Program was approved by the California State Director on November 7, 1988. The decision states that, "In order to accomplish vegetation treatments on public lands in

California and northwestern Nevada BLM managers will be allowed to utilize chemical methods in addition to current manual, mechanical and prescribed fire methods. The chemicals available for use are those with the following active ingredients: amitrole; asulam; atrazine; bromacil; 2,4-D; 2,4-DP; dalapon; dicamba; diuron; fosamine; glyphosate; hexazinone; picloram; simazine; tebuthiuron and triclopyr.”

The ROD is supported by the Final Environmental Impact Statement entitled “California Vegetation Treatment” (August 1988), included an alternative which prohibited the use of herbicides when managing vegetative resources.

Given that the California State Director has already made the decision to use herbicides in managing vegetative resources, Alternative C of the PRMP/FEIS has been revised accordingly.

## **Section: Natural Resources Management**

### **Action Code      34400 Habitat Improvement or Restoration**

**Rationale Codes                      4 Clarity of Information/Presentation**

Comment #24

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0151	WEINER	TERRY	DESERT PROTECTIVE COUNCIL

The Final EIS must specify and describe the nature of these "vegetation protection and enhancement" activities. There is reference to construction and maintenance of "structures". Please indicate what types of structures are being considered.

RESPONSE: Section 4.5.4 of the DRMP/DEIS has been revised to include “(e.g. habitat restoration and riparian area rehabilitation)” to further clarify the proposed protection and enhancement activities.

Structures and facilities referenced in the document are used synonymously and refer to any of the potential improvements on BLM-administered lands within the Planning Area, including but not limited to campgrounds and campground improvements, vault toilets, fencing, trailhead improvements, kiosks, horse corral, and wildlife waters.

**Rationale Codes** 335 Habitat/Vegetation Composition

Comment #203

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0147	FULLER	KELLY	

Other "desired plant communities": mixed riparian woodlands, semi-desert chaparral, mixed conifer woodland, and enriched desert scrub. Would surface-disturbing activities be designed to avoid impacts to these areas? If avoidance was not possible, would these areas be restored to their previously undisturbed or native condition? If the answer is "not" for either of these questions, why not?

RESPONSE: The 7<sup>th</sup> management action listed in Section 2.3.5.1.2 of the DRMP/DEIS that discusses avoidance of riparian areas has been revised to include specific reference to mixed riparian woodland.

**Section: Natural Resources Management**

**Action Code** 34500 Fire and Fuels Management

**Rationale Codes** 370 Cultural Resources

Comment #56

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0144	COYLE	COURTNEY ANN	HELD-PALMER HOUSE

With better communication, archaeological technical support and tribal consultation many of these areas [lost in Cottonwood Canyon and nearby areas during the Pines and Cedar fires] could have been preserved during fire suppression. The Draft RMP/EIS should be amended to reflect efforts to reduce such impacts in the future through improved planning and training for tribal cultural resource preservation in Section 2.3.8.1. Goals and Objectives.

RESPONSE: Under the Cooperative Fire Protection Agreement (Operating Plan) between BLM, USFS, and the San Diego unit of CAL FIRE, the first responder (typically CAL FIRE), is supposed to notify BLM staff in "a timely manner" of fires that occur on or threaten BLM-administered lands. The initial responders function as the representative resource agency advisor; who then contacts technical staff from El Centro who provide the fire responders with appropriate resource information within the first 24-48 hours and provide recommendations on areas to avoid in an effort to protect special status species, cultural resources, and special designation areas. The

resource team would look at areas of expertise, prepare 1-2 page brief (with maps as necessary) for the command team, and provide assistance in making educated decisions. Often, this information is not available during the initial attack of a wildfire, but would be provided for on-going management of the fire. Wildfire responders must balance the sensitivity of the resource with overall risks, such as firefighter public safety, and private property which are the first priorities. Management actions have been added to Sections 2.3.8.2 (Wildland Fire Management) and 2.3.9.2 (Cultural resources Management) of the DRMP/DEIS that identify the use of resource advisors for the purpose of avoiding and minimizing impacts to sensitive resources.

## **Section: Natural Resources Management**

**Action Code**      34510 Wildland Fires General

**Rationale Codes**      819 Health and Safety

Comment #127

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0171	TISDALE	DONNA	BOULEVARD PLANNING GROUP

DRMP opens the door to increased fire potential in an area of red-zoned high-fire danger, and negative impacts to public health and safety.

RESPONSE: The BLM Land Use Planning Handbook, H-1601-1 (Appendix C, Section E, item 8) requires BLM to identify existing and potential development areas for renewable energy projects (e.g. wind and solar). Approval of wind energy facilities is an implementation-level decision, rather than an RMP-level decision, and will require site-specific NEPA analysis before any of these actions could be approved. The NEPA analysis would require evaluation of wildfire potential from the proposed action, a plan of development, appropriate mitigation, and emergency response plan, before an ROW can be approved.

**Section: Natural Resources Management**

**Action Code**      34610 Firewood Collection

**Rationale Codes**            131 NEPA

Comment #133

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0173	BELENKY	LISA	CENTER FOR BIOLOGICAL DIVERSITY

the DRMP/DEIS fails to discuss the environmental consequences of allowing collection of dead, downed wood, and must be amended thereto in order to comply with NEPA's requirement of disclosure of direct, indirect and cumulative environmental impacts of agency actions. 42 U.S.C. Section 4332(C).

RESPONSE: Section 2.3.5.4.3 has been revised to clarify that collection of dead and downed wood under Alternatives B, D, and E, would only be allowed for personal campfire use within the campgrounds and must be hand carried to the campsite. In addition, Section 2.3.5.4.1 of the DRMP/DEIS has been revised so that the goal and objective that states "promote appropriate levels of dead and downed wood on the ground" is specific to the areas outside of the campgrounds. Lastly, Section 4.6.1, which address impacts to wildlife habitat, has been revised to include the following: "The collection of dead and downed wood for personal campfire use in the campgrounds could result in a reduction of this habitat component within the vicinity of the campgrounds. If monitoring indicates potential resource degradation, closure to firewood collection would be implemented using adaptive management. As the collection of dead and downed wood is restricted to the campground areas, this action will not impact the most of the BLM-administered lands within the Planning Area."

**Section: Natural Resources Management**

**Action Code**      34810 Prescribed Fire

**Rationale Codes**            160 Agency Rules, Plans, Policies

Comment #255

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0186	RICHARDSON	CHRIS E.	

If I was notified in August of 1993 that a burn was necessary, why did it take five years before the burn occurred? Does it take that long to get permission from all other entities involved?

RESPONSE: Prescribed burns are conducted at the first available and appropriate opportunity. Delays can occur due to conditions which may include factors such as weather, staff availability, and funding. The referenced burn was conducted at the first available and appropriate opportunity.

## Section: Natural Resources Management

### Action Code 35000 Domestic Livestock Management

Rationale Codes 4 Clarity of Information/Presentation

Comment #183

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0119	SMITH	ROBERT	

Please note that your Table ES-1 (page ES-4) is incorrect in that it indicates that livestock grazing is excluded in Alternative A rather than Alternative E.

RESPONSE: The referenced item in Table ES-1 of the DRMP/DEIS for Alternative A is correct; this summarizes the existing protections for riparian areas, not the overall planning area. The two subsequent potential decisions in this table describe restrictions within riparian areas for Alternatives B through E.

Comment #108

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0169	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

"Table 3-8 illustrates the current grazing activity which occurs only in the McCain Valley Allotment. The following is a description of all of the grazing allotments within the Planning Area"

...eliminate cattle grazing throughout the ESDC area.

RESPONSE: Chapter 3 and Table 3-8 of the DRMP/DEIS describe the Affected Environment (i.e. existing conditions). Management actions pertaining to grazing are presented in Chapter 2, Livestock Grazing Management (see Section 2.3.14 and Table 2-11 of the DRMP/DEIS) which presents the range of alternatives under which acreages within the allotments are evaluated as available or unavailable for grazing.

**Section: Natural Resources Management**

**Action Code 35100 Grazing Management/AUMs**

**Rationale Codes** 4 Clarity of Information/Presentation  
 Lett. # LAST NAME FIRST, MI ORGANIZATION NAME  
 Comment #256  
 EC-0186 RICHARDSON CHRIS E.

[Table 4.13] Question: This section states that the study was based on eleven cattle per 10,000 acres. Is it valid to base the impact of cattle grazing on the ration of eleven cows to such a large acreage?

RESPONSE: 11 cows using 10,000 acres is the current condition on the McCain Valley Tierra Blanca allotment. The impact analysis performed and summarized in Table 4-13 was based on the 8 grazing criteria (Section 2.3.14, and Appendix E) and existing rangeland health assessments. As identified in Table 4-18 of the DRMP/DEIS, the economic impact analysis is based on 63,879 acres averaging 131 head of cattle.

**Rationale Codes** 370 Cultural Resources  
 Comment #238  
 Lett. # LAST NAME FIRST, MI ORGANIZATION NAME  
 EC-0185 WELLS MICHAEL L. DEPARTMENT OF PARKS AND RECREATION, STATE OF CALIFORNIA

It is not clear in the DRMP whether existing grazing allotments will be permanently cancelled, or simply put into an inactive status. State Parks requests that the grazing allotment known as Canebrake be canceled, not simply put into a category of “vacant” or “temporarily inactive.” ...

A high density of archeological sites exists in both the southern and northern Inner Pasture areas, including rock art sites, burial and cremation sites, and village sites. These sites were heavily impacted by cattle grazing in the past.

RESPONSE: The land use planning decisions made in this document are whether lands are available or unavailable for grazing. Under Alternatives C and E (preferred), the allotments would not be cancelled, but would be classified as unavailable for grazing. This means that grazing would no longer be permitted or leased on the

## 5.2 Public Comment Process

allotments. However, permitting grazing for short amounts of time as a means of vegetation management (e.g. fuels reduction for fire prevention) would still be considered on a case-by-case-basis.

**Rationale Codes**                    373 Historical

Comment #189

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0178	PALMER	RICHARD W.	

With a history of over a century of grazing, you might say that cattle have become part of the valley's ecology. I strongly urge that this tradition range use be continued.

RESPONSE: Part of the RMP process is to identify Rangeland Health Standards. These are presented in Section 2.3.1 of the DRMP/DEIS. In addition, Section 2.3.14.5 presents the Rangeland Guidelines for Grazing Uses by Alternative and the Criteria for Classifying Allotments as Ephemeral. Based on the allotment evaluations, the preferred alternative proposes to make all lands within the Planning Area unavailable for livestock grazing. This means that grazing would no longer be permitted or leased on the allotments. However, permitting grazing for short amounts of time as a means of vegetation management (e.g. fuels reduction for fire prevention) would still be considered on a case-by-case-basis.

## Section: Natural Resources Management

**Action Code**                    35200 Allotments

**Rationale Codes**                    4 Clarity of Information/Presentation

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0173	BELENKY	LISA	CENTER FOR BIOLOGICAL DIVERSITY

Comment #140

The DRMP/DEIS notes that the Canebrake allotment is "currently undergoing the grazing permitting process." DRMP/DEIS at 3-111... the DRMP/DEIS does not mention when the current leases/permits on the McCain Valley -- In-Ko-Pah and -- Tierra Blanca allotments will expire, which would be useful background information and should be included.

RESPONSE: The leases on both the McCain Valley In-Ko-Pah and McCain Valley Tierra Blanca allotments will expire in 2010. The referenced section has been updated to include this information.

**Section: Natural Resources Management**

**Action Code**      36000 Mining and Mineral Exploration

**Rationale Codes**      160 Agency Rules, Plans, Policies

Comment #251

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0185	WELLS	MICHAEL L.	DEPARTMENT OF PARKS AND RECREATION, STATE OF CALIFORNIA

The development and/or extraction of "locatable mineral deposits" should also be excluded from designated Critical Habitat areas to maximize the opportunity for listed species recovery. This action would make the DRMP consistent with its goal in Section 2.3.7, Special Status Species Management, which states, "Land use plan decisions would be consistent with BLM's mandate to protect and recover species listed under the ESA and would be consistent with objectives and recommended actions in approved recovery plans."

RESPONSE: The only way for BLM to exclude the development or extraction of a mineral deposit from critical habitat would be to recommend that the area be withdrawn from mineral entry. Only the Secretary of Interior may approve a withdraw lands less than 5,000 acres in size and for areas larger than 5,000 acres, Congressional approval is required. This proposed withdrawal was evaluated under Alternative C.

**Rationale Codes**      238 Mineral Resources

Comment #193

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0133	CHAMBERLAIN	BARBARA	THE COMMITTEE FOR RESPONSIBLE GROWTH

Alternative C protects WSA and ACEC from mineral entry.

RESPONSE: BLM does not have the authority to withdraw BLM-administered lands

from mineral entry. As stated in Table 2-14 of the DRMP/DEIS, BLM would propose withdrawal of both designated ACECs and WSAs from mineral entry. However the actual withdrawal decision/approval lies with the Secretary of the Interior when the proposed withdrawal is less than 5,000 acres. Withdrawal of 5,000 acres or more requires Congressional approval.

## Section: Natural Resources Management

### Action Code 36200 Leasable (Oil, Gas)

Rationale Codes 4 Clarity of Information/Presentation

Comment #45

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0156	SCHWARTZ	WILLIAM	STEPHENSON WORLEY GARRATT SCHWARTZ GARFIELD & PRAIRIE

In order to allow for meaningful review of the potential impacts of the proposed changes, please identify the locations of existing geothermal wells and the potential for future drilling activities.

RESPONSE: Please see Section 3.16.3 and Figure 3-18 of the DRMP/DEIS which discuss the geothermal potential. There are currently no geothermal wells or pending applications for geothermal leasing present on BLM-administered lands within the Planning Area.

Rationale Codes 160 Agency Rules, Plans, Policies

Comment #44

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0156	SCHWARTZ	WILLIAM	STEPHENSON WORLEY GARRATT SCHWARTZ GARFIELD & PRAIRIE

The RMP/EIS discounts impacts from geothermal leasing because "there are no geothermal leases or applications for leases within the Planning Area" despite the classification of 80,240 acres as prospectively valuable for geothermal resources. This analysis fails to address reasonably foreseeable significant impacts as a result of the BLM's new Geothermal Resources Leasing Regulations, effective June 1, 2007.

RESPONSE: Neither the classification of 80,240 acres as prospectively valuable for geothermal resources, the Energy Policy Act of 2005 (Public Law 109-58), nor the new BLM geothermal regulations under 43 Code of Federal Regulations (CFR) Part 3200 mandate that Resource Management Plans such as the Eastern San Diego County RMP include a reasonably foreseeable development scenario for, in this case, geothermal resources. The classification of the lands as prospectively valuable, as opposed to being classified as a Known Geothermal Resource Area, as defined under 43 CFR 3200.1, suggests that development of these lands for geothermal resources would most likely be in the form of direct utilization, such as aquaculture, greenhouse, and spas.

Based upon the documented temperatures (80-100 F) of the thermal waters in and around the communities of Jacumba, Agua Caliente, and Vallecitos (Hodgson and Youngs 2002), the utilization of the resources would most likely be considered under the direct use portion of the 43 CFR Part 3200 regulations. Direct use facilities, unlike powerplants and ancillary facilities including cooling towers, production and injection wells, and transmission lines, which would require adequate NEPA analysis and documentation before processing, tend to generate fewer environmental impacts, and therefore may be permitted under a geothermal direct use lease with appropriate mitigation.

The direct use leasing regulations allow for very small acreage to be incorporated under a lease, utilizing only the minimal amount of acreage to be developed. In this light, these resources are available for utilization as long as the plan does not preclude leasing. As a result, the direct use facilities which may be considered in this area are anticipated to require minimal NEPA documentation and may be permitted with minimal need for mitigation. Therefore, unlike the consideration for geothermal resources which may be of sufficient heat as to be utilized for electrical generation, the low temperature potential for geothermal resources within Eastern San Diego County RMP does not warrant the development of a reasonably foreseeable development scenario, nor potential impact analysis at this level. Again, the lands within the Plan will remain available for geothermal leasing, at both the full development level (electrical production) and the direct use level unless specifically prohibited in the Plan.

## Section: Natural Resources Management

**Action Code** 36600 Energy Resources/ Alternative Energy Development

**Rationale Codes** 3 Adequacy of Analysis

Comment #206

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0147	FULLER	KELLY	

The stated cost of \$720,000 per MW for equipment is outdated. People who work in the industry have told me the current cost is closer to \$1.5 to 2 million per MW, and that turbine prices have increased 60% in the last two years.

RESPONSE: An estimated total cost for installed wind-powered electrical generation of \$1.5 to \$2.0 million per MW is probably a more reasonable estimate of current costs per MW than the \$900,000 per MW reported by the BLM in a 2005 study (*Final Programmatic Environmental Impact Statement on Wind Energy Development on BLM-Administered Lands in the Western United States* [DOI BLM 2005a]). SDG&E recently purchased development rights for a proposed 250-megawatt wind generation project in La Rumorosa, Mexico. SDG&E has estimated a total investment of about \$400 million at project completion, yielding a per MW cost of about \$1.6 million. Chapter 3 has been updated to include this cost per MW.

The higher per MW cost for wind power generation would imply a higher threshold for significant economic impact of about \$750 million (500 MW). This threshold would represent 10% of the 4,813 MW regional peak demand forecast by SDG&E for 2015 (SDG&E, "Sunrise Powerlink Transmission Project: Purpose and Need," Vol. 2, December 14, 2005). The resulting economic impacts are generally seen as positive in terms of employment and income generation, as well as reduced dependence on imported fossil fuels for electricity generation within the region. Chapter 4 has been updated to include the 4,813 MW forecast regional peak demand.

However, any proposed site-specific wind energy development facility on BLM-administered land would be required to submit a project-specific Plan of Development (POD) and must contact appropriate agencies, property owners, and other stakeholders. A POD must analyze the economic impacts based on the parameters of the proposed project and must address potentially sensitive land uses and issues, rules that govern wind energy development locally, and land use concerns specific to

the region. Additional mitigation measures would be applied in the form of stipulations in an ROW authorization (DOI BLM 2005a).

**Rationale Codes**

4 Clarity of Information/Presentation

Comment #16

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0150	VOLKER	STEPHAN C.	LAW OFFICES OF STEPHAN C. VOLKER

The DEIS also do not give the reader an accurate sense of how much land will be withdrawn from public use and put to industrial use. The Plan states:

Solar and wind facilities may alter access to some backcountry areas and may adversely impact recreational use of nearby areas as well. Both solar and wind facilities require a number of acres to be withdrawn from other uses, but this is small in comparison to the Planning Area as a whole. Based on informal comments from the public and anecdotal evidence, this is not a significant concern on the part of other user communities.

DEIS, p. 4-92 through 4-93.

RESPONSE: The BLM Land Use Planning Handbook, H-1601-1 (Appendix C, Section E, item 8) requires BLM to identify existing and potential development areas for renewable energy projects (e.g. wind and solar). Approval of renewable energy facilities is an implementation-level decision, rather than an RMP-level decision, and will require site-specific NEPA analysis before the development of a renewable energy facility could be approved. The NEPA analysis would evaluate a specific project design and identify project-specific access restrictions.

While facilities, such as the area surrounding structures, electrical infrastructure, etc., may be restricted for security and safety reasons (e.g. fencing), the general area would remain available for public use. On BLM-administered lands, a withdrawal removes an area of federal land from settlement, sale, location, or entry under some or all of the general land laws, for the purpose of limiting activities under those laws to maintain other public values in the area or reserving the area for a particular public purpose or program. Withdrawals are also used to transfer jurisdiction over an area of federal land from one department, bureau, or agency to another. To clarify the intent, the term withdrawn has been deleted in cited section and the text revised

accordingly.

Comment #112

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0169	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

[Page 3-132] The inclusion of wind energy sites in ACECs and critical habitat for federally listed species (or any other T&E species) makes no sense. (See bottom of page 3-133.) Please explain why your analysis justified this decision.

RESPONSE: Chapter 3 describes the Affected Environment (i.e. existing conditions). The section cited is an assessment of the existing locations of wind energy potential based on a model that eliminated Wilderness and Wilderness Study Areas, but did not eliminate ACECs and Critical Habitat. Chapter 3 does not include management actions of where renewable energy development would be considered or excluded. Management actions pertaining to renewable energy are presented in Chapter 2, Lands and Realty Section under Renewable Energy (see Section 2.3.18.2.4 and Table 2-21 of the DRMP/DEIS) and presents the range of alternatives where ACECs and critical habitat are evaluated as either avoidance or exclusion areas for renewable energy under certain alternatives.

Comment #115

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0171	TISDALE	DONNA	BOULEVARD PLANNING GROUP

Planning process for renewable energy proposals and grid connections is being piecemealed rather than being properly coordinated jointly:

RESPONSE: The PRMP/FEIS is a programmatic level document to which site-specific implementation or project-related NEPA analysis would be tiered.

The CEQ, in its direction to reduce paperwork, developed regulations directing agencies to tier environmental analyses as identified in 40CFR1500.4(i): Using program, policy, or plan environmental impact statements and tiering from statements of broad scope to those of narrower scope, to eliminate repetitive discussions of the

same issues (Secs. 1502.4 and 1502.20). The CEQ regulations (40CFR1508.28) define tiering as follows:

Tiering refers to the coverage of general matters in broader environmental impact statements (such as national program or policy statements) with subsequent narrower statements or environmental analyses (such as regional or basinwide program statements or ultimately site-specific statements) incorporating by reference the general discussions and concentrating solely on the issues specific to the statement subsequently prepared. Tiering is appropriate when the sequence of statements or analyses is:

- a. From a program, plan, or policy environmental impact statement to a program, plan, or policy statement or analysis of lesser scope or to a site-specific statement or analysis.

**Rationale Codes**                      61 Local Citizens/Communities

Comment #84

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0160	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

we would like to have an explanation of why the PPM energy proposals were never noticed to the public. There were no hearings or notices that PPM had an interest in wind energy development in this area. It is our understanding that the law requires the public to be involved from the very beginning. That was not the case. Residents only found out about this about a year after the exploration leases were granted.

RESPONSE: A ROW was issued for testing and monitoring (meteorological towers). In the application, the applicant advised BLM that they were interested in the potential development of wind resources. No rights were authorized on those lands beyond testing and monitoring. An environmental assessment of the testing and monitoring ROW application was prepared in accordance with BLM NEPA procedures.

**Rationale Codes**                      161 Previous Resource Management Plans &

Comment #3

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0220	ANONYMOUS		

The study was actually done by PPM Energy, and they are the ones who ignored ACEC's and critical habitat in their study, apparently with BLM approval and support.

## 5.2 Public Comment Process

RESPONSE: Chapter 3 only describes the Affected Environment (i.e. existing conditions). The section cited in the comment from the DRMP/DEIS is an assessment of the existing locations of wind energy potential based on a model prepared by PPM Energy, which eliminated non-BLM-administered lands and Wilderness and Wilderness Study Areas only. Renewable energy development is prohibited from WAs by congressional designation and WSAs by failure to meet the non-impairment policy.

Please note that in response to public input and concern over using data provided by PPM Energy, BLM has revised this analysis and used the report *Assessing the Potential for Renewable Energy on Public Lands* prepared in 2003 by BLM and U.S. Department of Energy, Energy Efficiency, and Renewable Energy as the basis for identifying wind energy potential and areas that would be made available for potential wind energy projects. This assessment analyzed the potential for wind energy (and other renewable energy) development on public lands in the western United States. While the screening criteria used in the two reports (BLM and PPM Energy) are not identical, they are comparable with the result that the BLM report identified a larger area of potential wind energy development than PPM Energy identifies. These new data were incorporated into the PRMP/FEIS and used as the basis for identifying the areas that would be made available for potential renewable energy development (e.g., wind and solar). The PRMP/FEIS now also includes these areas as they vary by alternative in Maps 2-26 to 2-30.

Authorization of renewable energy development in critical habitat is evaluated through a range of alternatives as determined by ECFO and as presented in Chapter 2 and analyzed in Chapter 4.

Wind energy development in ACECs is prohibited by the ROD for the Implementation of a Wind Energy Program and Associated Land Use Plan Amendment (DOI BLM 2005f). Based on this ROD, ACECs have been identified as areas excluded from future renewable energy development under Alternatives B, C, D, and E. Table 2-21 of the DRMP/DEIS has been revised accordingly.

**Rationale Codes**                      520 Recreational Enjoyment

Comment #166

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0014	SHURTLEFF	ARTHUR B.	

I am concerned about the installation of any wind generating machines in McCain Valley, since it might restrict hunting opportunities.

RESPONSE: The DRMP/DEIS would not restrict hunting as that is under the jurisdiction of CDFG. Additionally, approval of wind energy facilities is an implementation-level decision, rather than an RMP-level decision, and would require site-specific NEPA analysis before any such actions could be approved. While facilities (such as the area surrounding structures, electrical infrastructure, etc.) may be restricted for security and safety reasons, the general area would remain available for public use.

**Rationale Codes**                      641 Wind Energy

Comment #174

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0083	RITTINER	LEE	

Also how close would the wind turbines being proposed be to the one we see on I-8?

RESPONSE: Approval of wind energy facilities is an implementation-level decision, rather than an RMP-level decision. Upon receipt of an application for a wind energy facility project, BLM would require a site-specific NEPA analysis before such an action could be approved. The NEPA analysis would evaluate a specific project design.

Comment #177

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0092	CARRICK	MATTHEW	

I just read the article about the wind towers proposed for McCain Valley.

RESPONSE: Approval of wind energy facilities is an implementation-level decision, rather than an RMP-level decision, and would require site-specific NEPA analysis before such an action could be approved.

5.2 Public Comment Process

**Rationale Codes** 643 Solar

Comment #196

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0136	RUSSELL	LOUISE	

I urge the BLM to explore local, smaller scale alternative energy sources, such as photovoltaic.

RESPONSE: There are no solar energy sites and to date, there have been no inquiries for solar development on BLM lands within the Planning Area. Based on current technology, solar potential is likely discounted due to lack of large open flat spaces, topography, vegetative cover, boulders, and/or excluded areas due to critical habitat, and VRM classes. BLM would evaluate applications submitted for solar energy development on BLM-administered lands within the Planning Area where renewable energy is not excluded.

**Rationale Codes** 819 Health and Safety

Comment #208

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0147	FULLER	KELLY	

The RMP needs to be reworked to address concerns about increased fire risk, flicker effects if near people (such as near the campgrounds in this RMP would reclassify as VRM III and thus eligible for wind energy development), stray voltage, and ice throw. The BLM's own Wind Energy Policy guidelines acknowledge these risks, so they should be included in the RMP.

RESPONSE: Approval of wind energy facilities is an implementation-level decision, rather than an RMP-level decision, and would require site-specific NEPA analysis before any of these actions could be approved. An assessment of impacts to health and safety issues and concerns would be made at that time.

**Rationale Codes** 900 Economic Conditions and Values,

Comment #201

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0147	FULLER	KELLY	

"The development of renewable sources of energy would reduce the use of irreversible/irretrievable energy resources." (e.g., ES-60) How does the BLM know that developing renewable energy on the land it administers would reduce the use of fossil fuel energy rather than just be in addition to it? ...As a result, substituting "might" or "may" for "would" in the sentence would be more accurate.

RESPONSE: The statement cited has been revised in Chapter 4 and the Executive Summary to read as follows: "The development of renewable sources of energy could reduce the irreversible/irretrievable commitment of nonrenewable energy resources."

**Rationale Codes**                      930 Net Public Benefit and Agency Accounting  
 Comment #113

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0169	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

"Renewable Energy. Renewable energy ROWS on BLM lands are generally for solar or wind energy sites." most of the money would not be spent here while money or labor for recreation management activities, which is mostly performed by local residents would stay here. These considerations should be entered into the equation for establishing priorities and making decisions on the various uses requested for the management area.

RESPONSE: Any future wind or solar energy facilities on BLM land are likely to generate very little economic impact (benefit) for the local community. Most of the initial cost of equipment and maintenance is likely to be associated with equipment and materials purchased from outside of San Diego County and construction and maintenance labor sourced from outside of the local community. BLM establishes priorities for land uses based on laws, regulations, and policies pertaining to all resource values existing in the Planning Area in accordance with the BLM's multiple use and sustained yield mandate.

**Rationale Codes**                      935 Agency Funding and Expenses  
 Comment #93

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0160	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

We have discussed the problem of law enforcement and it would seem reasonable,

especially in the case of wind energy, some of those revenues be returned in the area for law enforcement and improving the recreational facilities.

RESPONSE: Current regulation requires that revenues from renewable energy ROWs go into the General Fund of the National Treasury. The monies from the General Fund are appropriated by Congress.

## Section: Natural Resources Management

### Action Code 36700 Paleontological Resources Management

Rationale Codes 3 Adequacy of Analysis

Comment #242

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0185	WELLS	MICHAEL L.	DEPARTMENT OF PARKS AND RECREATION, STATE OF CALIFORNIA

Areas with four different paleontological sensitivity levels are defined (page 2-49, 3-85, 3-86) and plotted within the Planning Area (Figure 3-10). However, specific criteria used to evaluate the resource content and sensitivity of these areas is not provided, and the definitions are unsatisfactory.

2.3.10 Paleontological Resource Management. The document states that the paleontological potential of all lands within the Planning Area are based on "existing maps" (page 2-49). A reference to these maps is not provided.

A paleontologic sensitivity map is included in Final Anza-Borrego Desert State Park General Plan (DPR 2005). However, this source does not list geologic formations, the basis of the sensitivity units described.

RESPONSE: BLM's mission is mandated to allocate land uses under the concept of multiple use management and sustained yield. Multiple use does not mean that all uses can occur on each parcel of public land, but that through the land use process, BLM can manage to balance resource values. More detailed information would be

utilized in assessing impacts at the implementation level decision making process for site-specific projects or when applications for site-specific projects are received and analyzed. The EIS adequately categorizes, by general geological site characterization the potential for paleontological resource impacts to meet land use planning decisions. Where site specific assessments of projects are known to impact paleontological resources having scientific value, the value of these resources will be weighted against the need for the project, within the scope of BLM's responsibilities under the FLPMA and other enabling acts.

A reference to Map 3-9 has been added to Section 2.3.10 in the PRMP/FEIS to inform the reader of the location of the existing map.

While specific geologic units are not noted on Map 3-9 in the PRMP/FEIS, the map does indicate general geologic rock types that occur in the planning and the potential for these types to contain paleontological resources. For land use planning purposes, these general descriptions are sufficient for multiple use decisions. Where project specific actions are analyzed, BLM is mandated under the NEPA and FLPMA to assess the paleontological resources for impact analyses.

**Rationale Codes**

4 Clarity of Information/Presentation

Comment #243

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0185	WELLS	MICHAEL L.	DEPARTMENT OF PARKS AND RECREATION, STATE OF CALIFORNIA

A proactive program of resource assessment, specimen recovery and conservation is employed by other governmental agencies such as NPS at Hagerman Fossil Beds NM and John Day Fossil Beds NM, and by State Parks CDD (Jefferson 2001). What are the BLM plans to mitigate these negative natural impacts?

RESPONSE: The land use plan provides general and site specific information available at the time to make land use allocation decisions based on resource conflict and impact analysis. However, the plan does not abrogate the Bureau's responsibility to fully analyze site specific impacts associated with an individual project. BLM protocols during site-specific analysis may require characterizing, cataloging and or collection of scientifically important paleontological resources.

## 5.2 Public Comment Process

When scientifically significant resources are identified during these processes, the BLM will consult with appropriate agencies and scientific community members to develop appropriate mitigation to assure the public interest is served.

### **Section:** Natural Resources Management

#### **Action Code** 37100 Cultural Resources Management General

**Rationale Codes** 40 American Indians/Tribes

Comment #55

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0144	COYLE	COURTNEY ANN	HELD-PALMER HOUSE

Restoration of affected areas [cultural resources in and around Cottonwood Canyon lost during the Pines and Cedar fires] of tribal significance remains to be done and my client requests to initiate consultation on such activities.

RESPONSE: BLM will consult with Ms. Lucas of the Kwaaymii Laguna Band of Indians on this issue as requested.

**Rationale Codes** 100 Laws, policies

Comment #49

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0144	COYLE	COURTNEY ANN	HELD-PALMER HOUSE

...2) the Religious Freedom Restoration Act (RFRA) should be referenced at Section 2.3.9.

RESPONSE: This act has been added to Section 2.3.9 and Appendix B.

**Rationale Codes** 372 American Indian Values

Comment #51

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0144	COYLE	COURTNEY ANN	HELD-PALMER HOUSE

Finally, Section 3.9.2 "Prehistoric Context" should be revised to also include the

commonly held tribal view that local tribes were created in their geographical areas, evolved technologies over time and are not divided into artificial temporal periods.

RESPONSE: The Prehistoric Context section of the DRMP/DEIS (Section 3.9.2) addresses the archaeological evidence and archaeological models developed within the region. Tribal creation accounts are not generally addressed in an RMP/EIS.

Comment #215

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0010	SINGLETON	DAVE	NATIVE AMERICAN HERITAGE COMMISSION

Lack of surface evidence of archaeological resources does not preclude their subsurface existence...Lead agencies should include provisions for discovery of Native America human remains or unmarked cemeteries in their mitigation plans.

RESPONSE: Standard BLM practice requires projects to be subject to archaeological monitoring when there is reasonable expectation of the existence of subsurface deposits. The likelihood of subsurface cultural deposits is determined by a qualified archaeologist. BLM complies with NAGPRA, as identified in Section 2.3.9 of the DRMP/DEIS.

**Rationale Codes**                      373 Historical

Comment #221

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0010	SINGLETON	DAVE	NATIVE AMERICAN HERITAGE COMMISSION

Contact the appropriate California Historic Resources Information Center (CHRIS). Please contact the Sate Office of Historic Preservation for the CHRIS Information Center nearest you (916/653-7278). The record search will determine:

- If a part or the entire (APE) has been previously surveyed for cultural resources.
- If any known cultural resources have already been recorded in or adjacent to the APE.
- If the probability is low, moderate, or high that cultural resources are located in the APE.

## 5.2 Public Comment Process

-If a survey is required to determine whether previously unrecorded cultural resources are present.

If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.

RESPONSE: BLM requested from the NAHC a list of tribes to contact and the tribes were notified by mail and phone of this planning process and invited to participate in consultation.

### **Section: Natural Resources Management**

**Action Code**      37120 History

**Rationale Codes**                      4 Clarity of Information/Presentation

Comment #58

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0144	COYLE	COURTNEY ANN	HELD-PALMER HOUSE

...the Introductory paragraphs on pages 1-5 and 3-1 should be modified to state that the tribes were the first residents of this area instead of referring to them passively as only discovered by settlers encountering them while colonizing the coast.

RESPONSE: The introductory paragraphs on pages 1-5 (Section 1.2) and 3-1 of the DRMP/DEIS have been revised as follows: Small bands of Kumeyaay and Mountain Cahuilla Indians resided in this area. Early Spanish, Mexican, and American pioneers and settlers traversed the region on their way to developing coastal population centers.

**Section: Natural Resources Management****Action Code** 37200 Native American General**Rationale Codes** 3 Adequacy of Analysis

Comment #48

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0144	COYLE	COURTNEY ANN	HELD-PALMER HOUSE

1) Planning Criteria Number 8 referencing the potential use of cultural properties should also reference accommodating tribal cultural, ceremonial and sacred uses; ... 3) Table 2-5 "Use Allocations for Cultural Properties" needs significant revision regarding what is properly categorized as Scientific, Public and Traditional uses from a tribal perspective and lacks lines for ceremonial, scared, traditional cultural and cultural landscape properties, 4) tribal landscape and traditional uses should take priority over scientific and public uses, and 5) Section 4.9 "Impacts on Cultural Resources" is written almost solely from an archaeological standpoint and does not reflect tribal views including that: scientific study (objectifying a culture), accidental discoveries through ground disturbance (causing damage) and post fire exposure (increasing vandalism) are therefore not necessarily beneficial.

RESPONSE: Heritage resource use categories are articulated in the BLM Land Use Planning Handbook (Bureau of Land Management 2005:Appendix C:9). These particular categories cannot be altered at the regional or local level however the actual allocation of a site or sites into specific use categories can be based on many factors, including consultation with local tribes. The BLMs mission is to make every attempt at achieving a reasonable balance between preservation of natural and heritage resources on the one hand and the competing interests of various user groups on the other. Traditional Native American uses, including gathering plant materials, ceremonial, and religious uses, are placed under the category of traditional use.

## Section: Natural Resources Management

### Action Code 39200 Visual Resources Management

Rationale Codes 4 Clarity of Information/Presentation

Comment #90

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0160	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

Is it not public law that BLM must protect the Quality of scenic values on public lands? We thought VRM classification is supposed to address the public's concerns about open spaces and natural vista. We do not see this in your actions. How can you make these decisions without knowing what type of facility might be placed?

RESPONSE: FLPMA mandates multiple-use and sustained yield. An update of the existing inventory was conducted with a specific focus on the areas that had known high use since the MFP was developed. A range of alternatives was developed based on the results of the inventory update and the priorities identified under which these lands would be managed, consistent with BLM mandate for multiple-use and sustained yield.

Comment #91

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0160	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

We also wonder about the decision in the Table Mountain area to change the visual resource class from Class II to Class III. It would appear this is again a predetermined decision to open up the area for geothermal exploration and development. Why is this being changed? What is the justification for changing the visual resource management class for Airport Mesa?

RESPONSE: The DRMP/DEIS in Table 4-9, p. 4-55, identifies the Table Mountain (non-ACEC and non-WSA lands) as VRM Class II for all alternatives. The ACEC portion of Table Mountain is also VRM Class II and the WSA portion is VRM Class I for all alternatives.

The DRMP/DEIS identifies the Airport Mesa would be designated as Class II under Alternatives A and C, Class III under Alternatives B and E, and Class IV under Alternative D. VRM Class III is the most appropriate designation for the Airport Mesa area located within and adjacent to the existing utility corridor.

Comment #106

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0169	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

Please request a detail[ed]... survey and evaluation of the McCain Valley area for visual resources.

RESPONSE: The original VRM inventory, as well as the VRM Classifications, in the existing 1981 MFP, was completed by BLM staff. In an effort to update the VRM data, the contractor was tasked to conduct several tasks that included on-the-ground visual observations of the varying levels of increased use, surface disturbance impacts, and other cultural modifications that have occurred since 1981.

In McCain Valley, the area in the vicinity of Lark Canyon Campground and the adjacent OHV staging area, is an example of an area where achieving VRM Class II objectives (see Section 2.3.11.1 in the DRMP/DEIS) no longer possible without some trail closures and revegetation/restoration of the area. This is because the extent of existing surface area disturbance, especially when compared to the relatively undisturbed adjacent areas, does attract attention of the casual observer, especially since much of it is highly visible from the McCain Valley Road. This area could be managed as Class IV, where “major modifications of the existing character of the landscape can occur” and where the “level of change to the characteristic landscape can be high.” With increased management and some restrictions on OHV use, this area could also be managed as Class III, the objective of which is to partially retain the character of the landscape,” and where “activities may attract attention, but should not dominate the view of the casual observer.”

During the design process of any proposed activity or element, a visual analysis stage is included. The analysis stage involves determining whether the potential

## 5.2 Public Comment Process

visual impacts from proposed surface-disturbing activities or developments will meet the management objectives established for the area, or whether design adjustments will be required. A visual contrast rating process is used for this analysis, which involves comparing the project features with the major features in the existing landscape using the basic design elements of form, line, color, and texture. This process is described in BLM Handbook H-8431-1, Visual Resource Contrast Rating. The analysis can then be used as a guide for resolving visual impacts. Once every attempt is made to reduce visual impacts, BLM managers can decide whether to accept or deny project proposals. Managers also have the option of attaching additional mitigation stipulations to bring the proposal into compliance.

### Comment #7

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0220	ANONYMOUS		

How much time she spent in McCain Valley, if any; if she was given a tour, and whether her tour was confined to a drive-through, or whether she had actually been off the road into the areas that she was willing to downgrade from VRM II to VRM III and IV?

RESPONSE: The original VRM inventory, as well as the VRM Classifications, in the existing 1981 MFP, were completed by BLM staff. In an effort to update the VRM data, the contractor was tasked to conduct on-the-ground visual observations of the varying levels of increased use, surface disturbance impacts, and other cultural modifications that have occurred since 1981. The proposed decisions on VRM Classifications under various alternatives were based on BLM staff's field observations and knowledge of existing conditions and activities, as well as BLM's review of the data collected by the contractor for the VRM classification update.

**Rationale Codes**                      160 Agency Rules, Plans, Policies

### Comment #181

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0116	GONZALEZ	CECILIO	

I strongly oppose Alternatives B,D, & E and the proposed downgrading of Visual Resource

Management (VSR) Classification for the McCain Valley area, McCain Valley West, Lark

Canyon/Cottonwood Campgrounds, and the Airport Mesa Area, from Class II to Class III

or

IV "to accommodate renewable energy development". BLM is required to protect the quality of scenic values on public lands. (43 U.S.C. 1701)

RESPONSE: In response to public input and concern over the VRM classification of McCain Valley West, this area under the proposed plan alternative (Alternative E [preferred] in the DRMP/DEIS) in the PRMP/FEIS has been reclassified as Class III and the quoted sentence removed from the document. The Cottonwood and Lark Canyon Campgrounds have been reclassified as VRM Class IV to reflect the developed state of the areas.

Proposed VRM Classifications under different alternatives is based upon the existing visual character and level of cultural modification of the land in comparison to the 1981 classification and to the relative visual intactness of the adjacent lands. Even if these areas were classified as Class II or III, management activities and cultural modifications are not precluded. Rather, the BLM VRM Design Techniques for Mitigating Visual Impacts would be applied as they are for all surface disturbing projects, in order to minimize impacts to vegetation and landform, and to minimize visual contrast in form, line, color and texture.

Comment #210

EC-0148 SPROFERA CHRIS

[existing conditions are] fire rings and four vault toilets nestled under trees. This is not sufficient to cause a downgrading of visual resources. The visual resource rating of Lark Canyon should remain at level II.

RESPONSE: VRM Classifications are decisions made only by BLM staff. In an effort to update the VRM data, the contractor was tasked to conduct on-the-ground visual observations of the varying levels of increased use, surface disturbance impacts, and other cultural modifications that have occurred since 1981. The results of this visual survey update showed that the Lark Canyon Campground exhibited a very high level of surface disturbance, as characterized by the lack of vegetation in much of this area. Also, it is important to point out that evaluating the extent of cultural modification considers more than individual elements, such as fire rings and toilets.

## 5.2 Public Comment Process

The extent of surface disturbance is a primary and significant factor, especially when it is compared to adjacent vegetated areas. When use areas with no vegetative cover are compared to such adjacent areas, the level of visual contrast is high, and very evident to even the casual observer.

### **Rationale Codes**                      641 Wind Energy

Comment #190

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0178	PALMER	RICHARD W.	

The visual resource management classifications as they apply to McCain Valley should not be relaxed or lands down graded to lower classifications. If anything they should be strengthened. I'm totally opposed to the possibility of wind turbines dominating the hill tops and defining the valley skyline.

RESPONSE: In response to public input and concern over the VRM classification of McCain Valley West, this area under the proposed plan alternative (Alternative E [preferred] in the DRMP/DEIS) in the PRMP/FEIS has been reclassified as Class III. The Cottonwood and Lark Canyon Campgrounds have been reclassified as VRM Class IV to reflect the developed state of the areas.

Proposed VRM Classifications under different alternatives is based upon the existing visual character and level of cultural modification of the land in comparison to the 1981 classification and to the relative visual intactness of the adjacent lands. Even if these areas were classified as Class II or III, management activities and cultural modifications are not precluded. Rather, the BLM VRM Design Techniques for Mitigating Visual Impacts would be applied as they are for all surface disturbing projects, in order to minimize impacts to vegetation and landform, and to minimize visual contrast in form, line, color and texture.

In addition, Lark Canyon Campground/staging area, Cottonwood Campground, and Lark Canyon OHV area have all been identified as exclusion areas for renewable energy development (e.g. wind and solar) under Alternatives B,C, and E.

**Rationale Codes**                      815 Scenery, Visual Resources

Comment #156

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0004	STRAND	MICHELE	

The area would be better served if the BLM took the time and money to upgrade the area (like replacing informational signs at the overlook areas), rather than downgrade our VSR classification...

RESPONSE: The BLM Land Use Planning Handbook (H-1601-1, Section I, I) directs BLM to: "Designate VRM management class for all areas of BLM land, based on an inventory of visual resources and management considerations for other land uses. VRM management classes may differ from VRM inventory cases, based on management priorities for land uses (see BLM Handbook H-8410-1 for a description of VRM classes." While replacing informational signs could be very beneficial and could encourage a higher level of stewardship of scenic and other resources, the addition of signs does not directly impact the VRM Classification. VRM Classification is management-driven and based on objectives that prescribe the level of landscape modification that either exists now, or is desired for the future condition.

Comment #194

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0133	CHAMBERLAIN	BARBARA	THE COMMITTEE FOR RESPONSIBLE GROWTH

We think that the recreation areas should NOT be down graded visually. Instead these areas should be repaired and maintained in a better condition, OHV users should be able to enjoy their hobby in a beautiful, natural setting. Lark Canyon and Mc Cain Valley are extremely scenic.

RESPONSE: The BLM Land Use Planning Handbook (H-1601-1, Section I, I) directs BLM to: "Designate VRM management class for all areas of BLM land, based on an inventory of visual resources and management considerations for other land uses. VRM management classes may differ from VRM inventory cases, based on management priorities for land uses (see BLM Handbook H-8410-1 for a description of VRM classes." For the most part, these areas do have very high scenic qualities. Certain areas that have moderate to high levels of surface disturbance or other cultural modifications can no longer be managed in accordance with the Visual

5.2 Public Comment Process

Resource Management Objectives prescribed by the 1981 Management Framework Plan. In these cases the VRM Classification that most closely meets the existing desired (and feasible) future condition has been identified for each alternative.

**Section: Natural Resources Management**

**Action Code**      39500 Enforcement (Law/Policy Enforcement)

**Rationale Codes**      500 Recreation: General/Multiple/Other

Comment #151

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0003	WILSON	M. LYNN	

Unless BLM intends to have Rangers constantly patrolling the area for OHV violations, such desecration can only get worse under Alternative E (Preferred).

RESPONSE: BLM's staffing level is determined through the Congressional budget process. BLM will increase staff as funding becomes available.

Comment #209

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0178	PALMER	RICHARD W.	

The B.L.M. has no one in the camp [Cottonwood Campground] to supervise their visitor's behavior or activities.

RESPONSE: As of the 2007 season there are camp hosts residing at the Cottonwood Campground from May through September. This information has been added to Section 3.17.1.2 of the PRMP/FEIS.

**Section: Access and Transportation System Management**

**Action Code**            40000 Transportation System Mgmt (General Access, Multiple)

**Rationale Codes**            201 Environmental Quality and Ecosystem Integrity  
 Comment #160

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0011	BRANSFORD	JACK	SAN DIEGO COUNTY WILDLIFE FEDERATION

"...adequate recreational access should always be routinely provided to the public - except where countermanded by verifiable scientific or safety based reasons that are justifiable." This statement should be embedded as a planning objective...all planning decisions that affect recreational opportunities, especially the related travel network, whether for new roads, or old roads, should be predicated on considerations for both recreational uses and preservation of the public lands as determined by verifiable scientific or safety based data that must be made available to the public.

RESPONSE: The goals and objectives used in describing both RMP-level and Implementation-level decisions are provided in Section 2.3.17.1.1 of the DRMP/DEIS. Route decisions are made in accordance with the FLPMA mandate for multiple use and sustained yield.

**Section: Access and Transportation System Management**

**Action Code**            40120 Motorized/OHV only

**Rationale Codes**            4 Clarity of Information/Presentation  
 Comment #143

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0173	BELENKY	LISA	CENTER FOR BIOLOGICAL DIVERSITY

The DRMP/DEIS completely fails to describe the extent of the current unauthorized ORV use off designated trails and at unauthorized times.

RESPONSE: One of the desired outcomes of the planning effort is to identify and

## 5.2 Public Comment Process

designate individual routes of travel. A major goal and objective of the Transportation and Public Access Section of the DRMP/DEIS (Section 2.3.17.1.1), is to reduce and halt the unauthorized proliferation of motorized and non-motorized recreation trails on BLM-administered lands within the Planning Area. Issuance of the ROD will enhance BLM's ability to sign designated routes, restore damaged areas, and enforce the route designations.

### Comment #267

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0213	STOVIN	ED	SAN DIEGO OFF-ROAD COALITION

Section 4.17.3 says "Alternatives A, B, D, and E would maintain the same OHV area designations and thus would not result in a cumulative effect to OHV use in the region." Yet in section 4.17.2, table 4-16 shows alternatives B and E with 92.75 miles of motorized routes of travel and alternatives A and D with 108.65 miles of motorized route of travel. This contradicts section 4.17.3 statement that there would not be a cumulative effect to OHV use in the region. Which routes of travel would be lost in plans B and E compared with plans A and D? The DEIS and DRMP does not say. If the mileage is known, certainly the routes are also known.

RESPONSE: Section 4.17.3 has been revised as follows to include a discussion of cumulative impacts from the Routes of Travel designations:

Alternatives A, B, D, and E would maintain the same OHV area designations while Alternative C would increase the acreage of closed areas from 61,712 acres to 74,314 acres. Alternatives B, C, and E would reduce the mileage of motorized routes of travel. This would represent a 15 percent decrease of motorized routes of travel under Alternatives B and E, and a 28 percent decrease of motorized routes of travel under Alternative C. Under Alternatives B, C, and E, implementation could result in a cumulative loss of OHV routes in the region and a cumulative increase for some other recreational activities, e.g., birding, hiking.

To view how the routes vary by alternative, please see Maps 2-19 to 2-22 in the PRMP/FEIS. All maps are now printed at 11x17 for easier viewing of the data.

**Rationale Codes** 815 Scenery, Visual Resources

Comment #86

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0160	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

In Lark Canyon OHV area riders have gone outside the bounds of the facility. We do not condone at and we know that the great majority of OHV riders also do not condone this. But the damage and degradation done to area surrounding the OHV area should not be an excuse to downgrade the visual resources. On those areas the RMP should contain recommendations and guidelines for improved and increased enforcement with larger fines.

RESPONSE: One of the desired outcomes of the planning effort is to identify and designate individual routes of travel. A major goal and objective of the Transportation and Public Access Section of the DRMP/DEIS (Section 2.3.17.1.1), is to reduce and halt the unauthorized proliferation of motorized and non-motorized recreation trails on BLM-administered lands within the Planning Area. Issuance of the ROD will enhance BLM's ability to sign designated routes, restore damaged areas, and enforce the route designations. Increased signage, boundary markers, monitoring and enforcement of regulations could decrease the rate of future degradation of visual resources in the Lark Canyon OHV area.

**Section: Access and Transportation System Management**

**Action Code** 40320 Route Designation

**Rationale Codes** 4 Clarity of Information/Presentation

Comment #211

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0148	SPROFERA	CHRIS	

Section 4.17.3 says "Alternatives A, B, D, and E would maintain the same OHV area designations and thus would not result in a cumulative effect to OHV use in the region." Yet in section 4.17.2, table 4-16 shows alternatives B and E with 92.75 miles of motorized routes of travel and alternatives A and D with 108.65 miles of motorized routes of travel. This contradicts section 4.17.3 statement that there would not be a cumulative effect to OHV use in the region. Which routes of travel would be lost in plans B and E compared with plans A and D?

## 5.2 Public Comment Process

RESPONSE: Section 4.17.3 has been revised as follows to include a discussion of cumulative impacts from the Routes of Travel designations:

Alternatives A, B, D, and E would maintain the same OHV area designations while Alternative C would increase the acreage of closed areas from 61,712 acres to 74,314 acres. Alternatives B, C, and E would reduce the mileage of motorized routes of travel. This would represent a 15 percent decrease of motorized routes of travel under Alternatives B and E, and a 28 percent decrease of motorized routes of travel under Alternative C. Under Alternatives B, C, and E, implementation could result in a cumulative loss of OHV routes in the region and a cumulative increase for some other recreational activities, e.g., birding, hiking.

To view how the routes vary by alternative, please see Maps 2-19 to 2-22 in the PRMP/FEIS. All maps are now printed at 11x17 for easier viewing of the data.

### Comment #212

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0148	SPROFERA	CHRIS	

Table 2-19 says alternatives B - E would enlarge Lark Canyon Recreation Zone routes now limited to 40" or less to 10 feet wide. Why would the BLM want to make these routes 10 feet wide?

RESPONSE: The intent with regards to the Lark Canyon OHV Area was to identify a pull-off width that provided the ATVs the ability for safe passing along the route, not to widen the trail to 10-feet. The text (see Table 2-19) has been revised to the following for clarification: "Lark Canyon OHV Area, routes limited to ATVs 40" or less in size would have an average width of 5 feet. Vehicles may pull off of the route a maximum of 40 inches to allow for safe passing."

### Comment #258

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0188	MCGARVIE	JIM	SAN DIEGO OFF-ROAD COALITION

The DRMP discussed "acres" of land with "open," "limited" and "closed" designation but does not provide information as to the impact of the proposed changes on existing

routes in the planning area.

RESPONSE: Table 2-17 of the PRMP/FEIS, presents the OHV management area designations. Alternative A displays the current acres that are designated as open, closed and limited. The only change the RMP proposes would be in Alternative C, which further closes the ACECs to OHV use. Under this alternative all routes within the ACECs would no longer be available for motorized use. Selection of any of the other alternatives would not result in any additional change to the OHV Management Area designations.

The RMP is also designating individual routes of travel as motorized or non-motorized as an implementation-level decision in the Record of Decision. Table 2-19 provides the miles of routes of travel and Maps 2-19 to 2-22 of the PRMP/FEIS illustrate the proposed locations as they vary by alternative.

**Rationale Codes**                      160 Agency Rules, Plans, Policies

Comment #40

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0155	GROSSGLASS	MEG	OFF-ROAD BUSINESS ASSOCIATION

In the executive Summary page ES-13 the Routes of Travel table it states that “Travel within the rest of the planning area will be limited to designated routes. We believe that travel within the planning area should be limited to existing routes not just designated routes.

RESPONSE: BLM LUP Handbook (H 1601-1 Appendix C, II. Resources Uses, Section D, subsection Implementation Decisions) requires the identification of specific areas, roads, and/or trails that will be available for public use and specification of the limitations placed on the use. This guidance is further refined by 43 CFR 8340.0-5(g) to designate each route as motorized or non-motorized with any applicable limitations.

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Comment #111

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0169	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

We want to have consideration of routes for closing, opening or classifying as limited access to be a separate distinct part of the planning process.

RESPONSE: The designation of routes, while a separate and distinct part of the planning process, is being done concurrently with the development of the RMP and the decisions for individual route designations will be included in the ROD for the RMP.

**Rationale Codes**                      400 Roads and Trails, Trans System

Comment #149

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0003	WILSON	M. LYNN	

There were a few trails which had been graded in by a contractor under the auspices of the BLM. Those trails are now only a part of dozens of trails with the additional ones being gouged out by OHV vehicles.

RESPONSE: BLM LUP Handbook (H 1601-1 Appendix C, II. Resources Uses, Section D, subsection Implementation Decisions) requires the identification of specific areas, roads, and/or trails that will be available for public use and specification of the limitations placed on the use. This guidance is further refined by 43 CFR 8340.0-5(g) to designate each route as motorized or non-motorized with any applicable limitations. In addition, a major goal and objective of the Transportation and Public Access Section of the DRMP/DEIS (Section 2.3.17.1.1), is to reduce and halt the unauthorized proliferation of motorized and non-motorized recreation trails on BLM-administered lands within the Planning Area.

Comment #165

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0014	SHURTLEFF	ARTHUR B.	

I would support the preferred Alternative E provided that the roads that are now open to vehicular traffic remain open

RESPONSE: BLM LUP Handbook (H 1601-1 Appendix C, II. Resources Uses, Section D, subsection Implementation Decisions) requires the identification of specific areas, roads, and/or trails that will be available for public use and specification of the limitations placed on the use. This guidance is further refined by 43 CFR 8340.0-5(g) to designate each route as motorized or non-motorized with any applicable limitations.

**Rationale Codes**                      530 Off Highway Vehicle Use (OHV)

Comment #148

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0003	WILSON	M. LYNN	

The DRMP/DEIS says that such vehicles will be required to use only designated trails and cannot park more than 25 feet off such trails.

RESPONSE: The referenced 25 foot distance is part of the range of alternatives described in this table. Under Alternatives C and E, motorized vehicles would be allowed to pull off 25 feet from the edge of a designated route; under Alternative B, motorized vehicles would be allowed to pull off 100 feet from the edge of a designated route; under Alternatives A and D motorized vehicles would be allowed to pull off 300 feet from the edge of a designated route. Furthermore, within Lark Canyon OHV Area, routes limited to ATVs 40" or less in size would have an average width of 5 feet, and these vehicles may pull off of the route a maximum of 40 inches to allow for safe passing.

Comment #66

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0145	STEWART	JOHN	CALIFORNIA ASSOCIATION OF 4 WHEEL DRIVE CLUBS

The DRMP would apparently limit full-sized four wheel drive recreation to designated "roads" that receive regular maintenance so they may be continuously utilized at its original designed capacity and intended purpose. The DRMP presents a problem in that the un-maintained, rugged roads that are currently very popular for this activity will necessarily be designated "trails" and therefore, closed to full-sized four wheel drive vehicles.

RESPONSE: The last item in Table 2-18 has been revised to: "BLM routes would be inspected and some may be maintained on a periodic basis." For example, the main access to McCain Valley is maintained to provide access for low-clearance vehicles.

As described in Section 2.3.17.2, routes will be designated as motorized or non-motorized and shown in Maps 2-19 to 2-22 in the PRMP/FEIS. The only limitations on vehicle size on motorized routes on BLM-administered lands in the Planning Area is in the Lark Canyon OHV area.

## Section: Access and Transportation System Management

**Action Code** 41000 Route Management General

**Rationale Codes** 4 Clarity of Information/Presentation

Comment #42

Lett. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0155	GROSSGLASS	MEG	OFF-ROAD BUSINESS ASSOCIATION

On page 2-113 in the Routes of Travel table it states that in Alternative A (currently) motorized vehicles may be allowed to pull off 300 feet from the edge of a designated route. In Alternative E it states that motorized vehicles may be allowed to pull off 25 feet from the edge of a designated route. We strongly disagree with this change. 25 feet is not enough room to safely pull off a trail for larger vehicles, like full size trucks and SUVs, and not hinder traffic flow.

RESPONSE: The majority of roads within the County are 10 to 12 feet in width. The

25-foot pull off distance accommodates at least two full-sized vehicle widths and should provide for safe passing of traffic.

Comment #262

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0202	SCHOECK	ARNOLD F.	

in Chapter 4 is that the Lark Canyon routes of travel average 6 feet in width. In the Executive Summary one learns that the with for these trails will be increased to 10 feet. But the maximum width the routes were built to was 5 feet...Instead the RMP is going to widen the route without any rationale to 10 feet for routes limited to trail bikes and quads. So rather than correct a problem, the RMP will increase the impacts by 200%

RESPONSE: The 6 foot width referenced in Chapter 4 is an average width that encompasses all OHV routes within the Planning Area. The text has been revised to read 5-7 feet on average to encompass route variability.

The intent with regards to the Lark Canyon OHV Area was to identify a pull-off width that provided the ATVs the ability for safe passing along the route, not to widen the trail to 10-feet. The text (see Table 2-18 of the PRMP/FEIS) has been revised to the following for clarification: "Lark Canyon OHV Area, routes limited to ATVs 40" or less in size would have an average width of 5 feet. Vehicles may pull off of the route a maximum of 40 inches to allow for safe passing."

Comment #268

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0213	STOVIN	ED	SAN DIEGO OFF-ROAD COALITION

Table 2-19 says alternatives B - E would enlarge Lark Canyon Recreation Zone routes now limited to 40" or less to 10 feet wide.

RESPONSE: The intent with regards to the Lark Canyon OHV Area was to identify a pull-off width that provided the ATVs the ability for safe passing along the route, not to widen the trail to 10-feet. The text (see Table 2-18 of the PRMP/FEIS) has been revised to the following for clarification: "Lark Canyon OHV Area, routes limited to ATVs 40" or less in size would have an average width of 5 feet. Vehicles may pull off of the route a maximum of 40 inches to allow for safe passing."

## Section: Recreation Management

**Action Code** 50000 Recreation Management, General/Multiple

**Rationale Codes** 4 Clarity of Information/Presentation

Comment #185

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0119	SMITH	ROBERT	

[Please] modify the management plan to clarify the availability of the planning area for hiking, bird-watching, hunting and horse-back riding. Such as:

"Hiking, bird-watching, hunting, and horse-back riding are generally allowed in the planning area unless excluded in the specific areas by the management plan."

RESPONSE: The introductory language in Section 2.3.16 has been revised to include the following language: "The public lands are managed to maintain a variety of recreational opportunities. These include, but are not limited to, camping, OHV use, equestrian use, target shooting, hunting, mountain biking, hiking and backpacking, wildflower and wildlife viewing, birdwatching, rock climbing, photography, astronomy, rock hounding, and pleasure touring."

**Rationale Codes** 900 Economic Conditions and Values,

Comment 207

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0147	FULLER	KELLY	

In the tables on recreation, exactly how were the recreation dollars figures derived? There is not enough information given to be able to judge their accuracy.

RESPONSE: The recreational data for BLM land were provided by the BLM El Centro Field Office from the Recreation Management Information System (RMIS) as cited in Section 3.19.5.1 and 4.18.4 of the DRMP/DEIS. Recreational use data for BLM land was available for FY2004-2005 (the most current available data at the time of writing this report). The RMIS provides recreational use data for the Carrizo Overlook (day use), Cottonwood Campground, Lark Canyon Campground, and dispersed recreational use of McCain Valley. Recreational use and spending data for the much larger Eastern San Diego County Planning Area was based on the CIC Research, Inc., "2005 San Diego County Visitor Profile and Economic Impact Study," July 2006. This study was prepared by CIC Research, Inc., under contract to the San Diego

Convention and Visitors Bureau. The 2005 study was based on 3,400 visitor intercept interviews conducted throughout San Diego County and 1,200 telephone interviews conducted with San Diego County households.

**Section: Recreation Management**

**Action Code** 50100 Special Recreation Management Areas,

**Rationale Codes** 4 Clarity of Information/Presentation

Comment #141

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0173	BELENKY	LISA	CENTER FOR BIOLOGICAL DIVERSITY

The definitions of the three types of SRMAs (community, destination, and undeveloped) are not well explained and differentiated, which they should be. DRMP/DEIS at 2-85,86.

RESPONSE: Recreation Management Areas, Section 2.3.16.1 of the DRMP/DEIS, has been revised to include the following descriptions:

An SRMA allocated to have a “Undeveloped” strategy is one where national, regional, and/or local recreation-tourism visitors, communities, or other constituents *value* the area for the distinctive kinds of dispersed recreation produced by the vast size and largely open, undeveloped character of their recreation settings found there. BLM’s recreation management actions are geared toward sustaining the distinctive undeveloped recreation setting characteristics. Major investments in facilities are excluded from these SRMAs, however, major investments in visitor *services* are authorized both to sustain those distinctive setting characteristics and to maintain visitor freedom to choose where to go and what to do, all in response to demonstrated demand for undeveloped recreation.

An SRMA allocated to have a “Destination” strategy is one where national or regional recreation-tourism visitors and other constituents value that area as a recreation-tourism destination. Major investments in facilities and visitor assistance are authorized within these SRMAs. Here, recreation management actions are geared toward meeting public demand for specific activity, experience, and benefit opportunities related to tourism. These opportunities are produced through

5.2 Public Comment Process

maintenance of prescribed natural resource setting character and by structuring and implementing management, marketing, monitoring, and administrative actions accordingly.

An SRMA allocated to have a “Community” strategy is one where a community or communities are dependent on the area’s recreation and/or related tourism use, growth, and/or development. Major investments in facilities and visitor assistance are authorized within these SRMAs. Here, recreation management actions are geared toward meeting local community demand for specific activity, experience, and benefit opportunities. These opportunities are produced through maintenance of prescribed natural resource and/or community setting character and by structuring and implementing management, marketing, monitoring, and administrative actions accordingly.

In addition, definitions of the following terms have been added to the glossary: SRMA, ERMA, community recreation-tourism market, destination recreation-tourism, undeveloped recreation-tourism market.

**Rationale Codes**                      620 Adjacent State Lands

Comment 23

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0151	WEINER	TERRY	DESERT PROTECTIVE COUNCIL

In regard to the formation of the SRMAs, please show how the uses planned in the areas to Anza-Borrego Desert State Park (ABDSP) are consistent with the ABDSP General Plan and protection of the Carrizo Gorge Wilderness and other State Park Resources.

RESPONSE: BLM planning regulations in 43 CFR 1610.3-2 Consistency Requirements state the following: “(a) Guidance and resource management plans and amendments to management framework plans shall be consistent with officially approved or adopted resource related plans, and the policies and programs contained therein, of other Federal agencies, State, and local governments and Indian tribes, so long as the guidance and resource management plans are also consistent with the purposes, policies and programs of Federal laws and regulations applicable to the public lands,…”

**Rationale Codes** 900 Economic Conditions and Values,  
 Comment #171

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0018	SHANNON	LINDA	

Please include in Alt. C, the Boulevard/Jacumba Destination Special Recreation Management Area, to enhance the goal of a tourist-based economy.

RESPONSE: The “Boulevard Destination SRMA” described in chapter 2 of the DRMP has been retitled the “Boulevard/Jacumba Destination SRMA”. The primary market strategy for this SRMA has been revised to include tourism in accordance with the BLM Land Use Planning Handbook, H-1601-1 Appendix C, Section II Resource Uses, C Recreation and Visitor Services.

**Section: Recreation Management**

**Action Code** 51000 Recreation Opportunity Spectrum

**Rationale Codes** 160 Agency Rules, Plans, Policies  
 Comment #142

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0173	BELENKY	LISA	CENTER FOR BIOLOGICAL DIVERSITY

In the section 3.17 of the DRMP/DEIS, the BLM discusses the use of the Recreation Opportunity Spectrum (hereinafter "ROS") as a tool to provide recreation management planning for the future and inventory current recreational uses. There are two major ambiguities with respect to the ROS that must be clarified. First, it is not clear what formulation of the ROS the BLM is using in the DRMP/DEIS. The glossary defines the six ROS categories as they have traditionally been used. Since the inception of ROS, the ROS has included six classes as defined in 1979 by Roger N. Clark and George H. Stankey that have been used by both the U.S. Forest Service and BLM for decades for classifying existing and desired recreation environments along a continuum ranging from primitive, low-use, and inconspicuous administration to urban, high-use, and a highly visible administrative presence. Included among the spectrum is the class Semi-Primitive Non-Motorized. However, the ROS as described in Appendix J of the DRMP/DEIS is devoid of this class and has altered the names and descriptions of all six categories.

RESPONSE: The BLM Land Use Planning Handbook (H-1601-1) states that the ROS is one of the existing tools for classifying recreation environments. BLM did discuss ROS definitions during the development of the recreation management sections of the DRMP/DEIS, however, it was decided that the ROS would not be used in planning for the future. Future planning for Recreation Management was conducted according to the BLM Land Use Planning Handbook (H-1601-1, Appendix C) which directs the BLM to identify Special Recreation Management Areas (SRMAs) and Extensive Recreation Management Areas (ERMAs), with Recreation Management Zones (RMZs) within each SRMA. Future Recreation Resource Management decisions are described in Section 2.3.16.1 of the DRMP/DEIS.

For accuracy, the mention of ROS in Section 3.17 of the DRMP/DEIS has been deleted along with Appendix J, "Categories and Definitions for ROS".

## Section: Recreation Management

### Action Code 52000 Motorized Recreation Management

Rationale Codes 3 Adequacy of Analysis

Comment #36

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0155	GROSSGLASS	MEG	OFF-ROAD BUSINESS ASSOCIATION

"Taking the High Road", a study released in 2002 by the OHMVR Division, states that "since 1980 the amount of land available to recreate on for green sticker vehicles (OHV) has shrunk 48 percent in our deserts alone, while green sticker registrations have increased 108 percent since 1980." There are almost 1 million green sticker vehicles registered in the state of California and, as of April 2, 2007 there are 91,929 registered green sticker vehicles in San Diego County alone.

RESPONSE: The report that appears to be referenced in the above comment is titled *Off-Highway Vehicle Recreation in the United States, Regions and States: A National Report from the National Survey on Recreation and the Environment (NSRE)* (Cordell et al, 2005). The statistic cited represents the estimated percentage of people over the age of 16 who participated in OHV use across the country between Fall 2003 to Fall of 2004. The report also states that this represents an increase in estimated use of 16.8 percent from the Fall 1999 to Summer 2000 timeframe. Furthermore, California green sticker sales, as published by California State Parks in *taking the High Road* in 2002, there was a 108% increase in green sticker registrations between

1980 and 2002.

BLM did take into consideration the current and future expected recreational use on BLM-administered lands within the Planning Area as part of this planning process. BLM's mission is mandated to allocate land uses under the concept of multiple use management and sustained yield. Through the land use planning process, BLM management decisions strive to balance resource uses with resource protection. Under this mandate, recreation demand, including OHV use in the Planning Area were considered in the land use planning decisions developed for the Plan.

**Rationale Codes**     935     Agency Funding and Expenses  
 Comment #123

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0171	TISDALE	DONNA	BOULEVARD PLANNING GROUP

Page 5-4 in this DRMP notes that BLM receives grants from the OHV Division of California Dept of Parks and Recreation "for maintenance, enhancement, and enforcement of recreational riding areas, including Lark Canyon". Is there a certain amount specifically designated for Lark Canyon? What is the average expenditure made at Lark Canyon for maintenance, enhancement, and enforcement?

RESPONSE: This is an incorrect statement and has been removed from the document. Funding for maintenance, law enforcement, and enhancement comes from fees collected in the area and funding from Congress. Annual expenditures vary based on availability of appropriated funding.

**Section: Recreation Management**

**Action Code**     52100 Recreational Access and OHV General

**Rationale Codes**     520 Recreational Enjoyment  
 Comment #169

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0016	TUFT	WILLIAM	BACKCOUNTRY HORSEMEN OF CALIFORNIA, DEL SOL CHAPTER

Motorized vehicles ... deserve to have a reasonable amount of public lands set aside for their use and their rights must be considered.

RESPONSE: The DRMP/DEIS provides a designated OHV area (Lark Canyon) which is limited to vehicles of 40” or less in width. Other routes would be available for use and vary by alternative as presented in Section 2.3.17.2 of the DRMP/DEIS, Implementation-Level Decisions: Routes of Travel.

## Section: Recreation Management

### Action Code 54400 Hunting/Shooting Fishing

Rationale Codes 4 Clarity of Information/Presentation

Comment #186

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0119	SMITH	ROBERT	

In the discussion of the McCain Valley RMZ on page 2-97, hunting is not listed as a primary activity, when in fact, it is one of the major recreational activities in McCain Valley

RESPONSE: The text in Section 2.3.16 has been revised to include hunting in the list of examples of recreational activities in the introduction of the recreation resource management section, and to identify hunting as a primary activity for each RMZ.

Comment #228

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0175	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

[Page ES-46] Hunting needs to be discussed here and BLM should make it clear hunting is a primary use for these lands.

RESPONSE: Page ES-46 is the impact analysis. The following information was added into the Recreation Management section of Table ES-1 which describes the potential decisions evaluated in the plan: “The public lands are managed to maintain a variety of recreational opportunities. These include, but are not limited to, camping, OHV use, equestrian use, target shooting, hunting, mountain biking, hiking and backpacking, wildflower and wildlife viewing, birdwatching, rock hounding, and pleasure touring.”

Comment #235

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0178	PALMER	RICHARD W.	

Noticeably lacking in the draft plan and statement is the impact of hunters taking deer and other game in areas designated as wilderness and critical habitat.

RESPONSE: Hunting is an activity that is licensed and regulated by California Department of Fish and Game. Since BLM does not issue authorizations to hunt, the analysis of impact to game populations from hunting is outside the scope of the DRMP/DEIS. All hunters issued permits by CDFG are required to comply with all public access regulations as described in the Transportation and Public Access Section 2.3.17 of the DRMP/DEIS.

**Rationale Codes**                      160 Agency Rules, Plans, Policies

Comment #204

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0147	FULLER	KELLY	

Will deer hunting still be allowed if wind energy is developed in McCain Valley? Will quail hunting still be allowed if wind energy is developed in McCain Valley?

RESPONSE: Approval of wind energy facilities is an implementation-level decision, rather than an RMP-level decision, and will require site-specific NEPA analysis before any of these actions could be approved. While facilities (such as the area surrounding structures, electrical infrastructure, etc.) may be restricted for security and safety reasons, the general area would remain available for public use, including hunting.

**Rationale Codes**                      350 Wildlife/Animals

Comment #104

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0169	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

[Page 3-33] One important and glaring omission is the presence of wild turkeys in the area. This species has become a major factor in hunting recreation for many people in the County.

5.2 Public Comment Process

RESPONSE: Section 3.6.3 Priority Wildlife Species Habitat, Game animals was revised to read as follows: "Mule deer and quail occur in the semi-desert, mixed, and chamise chaparral communities. Wild turkey also occur in a variety of habitats throughout the Planning Area. Hunting is popular in the areas where these species occur."

**Rationale Codes**                      520 Recreational Enjoyment

Comment #164

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0014	SHURTLEFF	ARTHUR B.	

Under Primary Activities there is no mention on hunting as an activity

RESPONSE: The text in Section 2.3.16 has been revised to include hunting in the list of examples of recreational activities in the introduction of the recreation resource management section, and to identify hunting as a primary activity for each RMZ.

Comment #173

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0083	RITTINER	LEE	

I just saw this in the San Diego Union-Tribune's online edition. I hunt many of these areas covered by this future plan. What would be the results on hunting these area with the different proposals?

RESPONSE: The DRMP/DEIS would not restrict hunting as that is under the jurisdiction of CDFG. Additionally, approval of wind energy facilities is an implementation-level decision, rather than an RMP-level decision, and would require site-specific NEPA analysis before any such actions could be approved. While facilities (such as the area surrounding structures, electrical infrastructure, etc.) may be restricted for security and safety reasons, the general area would remain available for public use.

**Section: Recreation Management**

**Action Code**      54500 Recreational Target Shooting

**Rationale Codes**              520 Recreational Enjoyment

Comment #158

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0006	HANSEN	C. E.	

Open areas previously used for shooting if possible

RESPONSE: All BLM-administered lands within the Planning Area are available for target shooting, with the exception of the McCain Valley RMZ and Table Mountain RMZ. However, the legal pursuit of game is allowed on BLM-administered lands throughout the Planning Area, subject to CDFG regulations.

**Section: Recreation Management**

**Action Code**      54600 Dispersed Camping

**Rationale Codes**              160 Agency Rules, Plans, Policies

Comment #184

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0119	SMITH	ROBERT	

I disagree with the elimination of the 14 day camping limitation in Alternative E (Table ES-1, page ES-12)

RESPONSE: This is not proposed for elimination in Alternative E and Table ES-1 has been corrected.

**Section: Recreation Management**

**Action Code** 54700 Equestrian/Pack Animals (Horses, Burros, Llamas)

**Rationale Codes** 520 Recreational Enjoyment

Comment #168

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0016	TUFT	WILLIAM	BACKCOUNTRY HORSEMEN OF CALIFORNIA, DEL SOL CHAPTER

As a horseman I am concerned that [BLM] may decide to close large tracts of land and restrict our access... [to] horse and mule users...

RESPONSE: The RMP would not close large tracts of land or restrict access to equestrian users of the BLM-administered lands within the Planning Area. As seen in the last paragraph of page 2-112 of the DRMP/DEIS, "non-motorized" routes would be open to biking, hiking, and equestrian use.

**Section: Recreation Management**

**Action Code** 54900 Other Recreational Uses

**Rationale Codes** 4 Clarity of Information/Presentation

Comment #94

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0160	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

What about photography, rock climbing, watching butterflies, wildflower viewing, star gazing and other astronomy, scenic overlooks, geology study and appreciation, meditation in a natural beautiful quiet scenic setting to name just a few.

RESPONSE: The introduction to the Recreation Resource Management Section 2.3.16 has been revised as follows to include a representative list of activities enjoyed by public users of the BLM-administered lands: "The public lands are managed to maintain a variety of recreational opportunities. These include, but are not limited to, camping, OHV use, equestrian use, target shooting, hunting, mountain biking, hiking and backpacking, wildflower and wildlife viewing, birdwatching, rock climbing, photography, astronomy, rock hounding, and pleasure touring."

**Section: Recreation Management**

**Action Code**      54930 Other Wildlife Dependent Recreation

**Rationale Codes**      245 Water Quantity

Comment #225

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0175	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

This should be changed to allowing construction of new wildlife waters on a case by case basis. We need to support wildlife which is one of the attractions for people recreating in these lands. Water is crucial to wildlife in this area and there are limited supplies of water and many of these are greatly reduced in flow or are absent much of the year due to the long periods of drought

RESPONSE: The DRMP/DEIS evaluates a range of alternatives. Alternative C identifies no new construction of wildlife waters while Alternatives B, D, and E (preferred), the construction of new wildlife waters would be allowed on a case by case basis.

**Section: Recreation Management**

**Action Code**      56000 Recreation Permitting

**Rationale Codes**      160 Agency Rules, Plans, Policies

Comment #261

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0202	SCHOECK	ARNOLD F.	

Will SRPs be based limited organized groups? Will certain types of groups be exempt from obtaining an SRP? Will SRPs be issued only during certain seasons?

RESPONSE: Special Recreation Permits (SRP) will be issued in accordance with BLM policy and 43 CFR 2930 regulations, as identified in Section 2.3.16.3 of the DRMP/DEIS: "Collect Special Recreation Permits (SRP) fees for commercial activities and organized group events on a case-by-case basis to provide for a wide range of recreation opportunities within the Planning Area."

## Section: Lands and Realty Actions

### Action Code 61000 Utility Corridors

Rationale Codes 4 Clarity of Information/Presentation

Comment #85

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0160	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

What is the probable size of such a corridor and has the route for this corridor or multiple corridors been determined? To properly analyze the impact on our area of the renewable energy potential we need to know, in addition to the footprint of the actual site-specific development, the route and size of the transmission lines. Will you provide this information and will it be included in the analysis before a decision is made?

RESPONSE: The designation of utility corridors is the RMP-level decision. Within the Planning Area, one utility corridor was identified with the intent that all major utility rights-of-way traversing the planning area be located only within this corridor. This corridor is described in Sections 2.3.18.4 and 3.15.1.1 of the DRMP/DEIS. Although major utility rights-of-way traversing the planning area must be located within a utility corridor, ROWs for individual transmission lines less than 161 kV are not required to be placed within a utility corridor. Approvals of wind energy facilities as well as their detailed designs or layout are implementation-level decisions, rather than RMP-level decisions. Upon receipt of an application for such projects, BLM would require a site-specific NEPA analysis before any of these actions could be approved.

Comment #109

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0169	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

"Designation of additional east-west corridors will be difficult since any corridors to the north would have to cross Anza-Borrego Desert State Park, which in the past has refused to consider corridors. The International Boundary precludes a corridor further to the south."

Your DRMP/DEIS is strangely silent on the issue of utility corridors.

RESPONSE: The BLM Land Use Planning Handbook, H-1601-1 (Appendix C,

Section E, item 7) provides that the designation of utility corridors is the RMP-level decision. Within the Planning Area, one utility corridor was identified with the intent that all major utility rights-of-way traversing the planning area be located only within this corridor. This corridor is described in Sections 2.3.18.4 and 3.15.1.1 of the DRMP/DEIS.

**Rationale Codes**                      640 Utility Corridors

Comment #145

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0001	TERZICH	CHRIS	SEMPRA UTILITIES

In its Final Scoping Notice [for the Sunrise Powerlink project], an alternative is being studied which traverses BLM land outside of the draft plan-identified corridor just west and outside of the Carrizo Gorge Existing and Proposed Wilderness Areas. It may be appropriate to include this alternative route in the Eastern San Diego Resource Management Plan at least as a contingent corridor, study corridor or other similar designation and/or include a discussion about this route or routes that affect the San Diego Management Plan Area.

RESPONSE: The BLM Land Use Planning Handbook, H-1601-1 (Appendix C, Section E, item 7) provides that the designation of utility corridors is the RMP-level decision. Within the Planning Area, one utility corridor was identified with the intent that all major utility rights-of-way traversing the planning area be located only within this corridor. Several of the currently proposed alternatives for the Sunrise Powerlink do conform with this corridor designation. The issuance of a major utility ROW, such as for the Sunrise Powerlink, is an implementation level decision and must either conform to the RMP or would require an amendment to the RMP before approval.

Comment #147

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0002	TERZICH	CHRIS	SEMPRA UTILITIES

It should be noted that SDG&E's existing 69kV transmission lines 637, 629, and 6923 appear to traverse BLM Lands covered by the Eastern San Diego Draft Resource Management Plan, as shown as separate e-mail attached maps. SDG&E would recommend that these lines also be included as utility corridors in recognition of their current use as well as to cover the possibility of upgrading to higher voltage lines in the event of system upgrades or to accommodate new renewable energy source projects such as wind, solar or geothermal which may be constructed in the future.

## 5.2 Public Comment Process

RESPONSE: ROWs for individual transmission lines less than 161 kV are not required to be placed within a utility corridor. Any future upgrade proposal of transmission lines not located within the designated utility corridor to greater than 161 kV would require a land use plan amendment and considered on a case-by-case basis, as the need arises.

### Comment #152

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0003	WILSON	M. LYNN	

While representatives of BLM deny that there are plans to put a wind farm in McCain Valley, it is curious that Alternative E (Preferred) specifically allows for transmission corridors. While the fact that there may be no plans *currently* under consideration, it is plain that such plans are contemplated or provisions for transmission corridors would not be a part of the discussion...such transmission corridors will contain construction sites and roads for the installation, and maintenance, of towers to carry high tension lines.

RESPONSE: The BLM Land Use Planning Handbook (H-1601-1, Appendix C, II Resource Uses, E. Lands and Realty Item 6) requires an RMP identify utility corridors traversing the area. The 1981 MFP designated a utility corridor that runs east-west on the south side of Interstate 8. In accordance with BLM policy, the RMP would continue this utility corridor designation. A utility corridor contains one or more major utility transmission lines that are greater than 161 kV.

## Section: Lands and Realty Actions

**Action Code**      62000 Rights of Way

**Rationale Codes**      640 Utility Corridors

### Comment #81

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0156	SCHWARTZ	WILLIAM	STEPHENSON WORLEY GARRATT SCHWARTZ GARFIELD & PRAIRIE

Sunrise Powerlink is San Diego Gas & Electric's ("SDG&E") electric transmission line proposed to be constructed between the Imperial Valley and San Diego. Although the exact route of the transmission line has yet to be determined, the RMP/EIS completely disregards the impact such a new transmission line may have on both geothermal and wind energy development.

RESPONSE: Regardless of where the Sunrise Powerlink Transmission line project may be located, there would be no effect on geothermal or wind energy potential development areas. Areas of potential are directly related to the location of the resource (i.e. geothermal and wind), thus the RMP only identifies those areas that support the potential for energy development.

**Section: Lands and Realty Actions**

**Action Code**      66000 Land Actions or Tenure

**Rationale Codes**              620 Adjacent State Lands

Comment #110

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0169	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

"The 1981 Eastern San Diego County MFP suggested that there may be some merit in adjusting boundaries between Anza-Borrego Desert State Park and BLM lands."...However we think in the new RMP a significant element of the plan should be the pursuit of adjusting boundaries to better manage the land by both the state Park and by BLM... We request that this be discussed in more detail as to opportunities and costs and the impact on the RMP since rationalization affects many parts of the RMP.

RESPONSE: Currently there are no discussions or expressed interest in disposing of any lands (through sale or exchange) to the State Parks or other government entities; however, BLM is open to evaluate this potential as the need arises. Any future disposal of lands to the State Parks, or other government entities, would require a plan amendment if the lands are not currently identified for disposal in the PRMP/FEIS.

**Section: Lands and Realty Actions**

**Action Code**      66100 Acquisitions

**Rationale Codes**              4 Clarity of Information/Presentation

Comment #52

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0144	COYLE	COURTNEY ANN	HELD-PALMER HOUSE

Recent Acquisitions. Please clarify whether the recent acquisitions by BLM in the

## 5.2 Public Comment Process

Cottonwood Canyon area are reflected in the Draft RMP/EIS. Have such properties been surveyed for tribal cultural resources including human remains?

RESPONSE: The DRMP/DEIS addresses all BLM-administered lands, including the recent acquisitions in the Cottonwood Canyon area, as reflected in Figure 1-1. Portions of the lands in the Cottonwood Canyon area have been inventoried for cultural resources.

**Rationale Codes**                      630 Private Property/Inholdings

Comment #54

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0144	COYLE	COURTNEY ANN	HELD-PALMER HOUSE

Explain why no boxes are marked for acquiring in holdings from willing owners in Table ES-1, Special Designations... If this is because it is a Management Action Common to All Alternatives, that should be made clear in the text.

RESPONSE: This has been corrected to correspond to Table 2-8 of the PRMP/FEIS.

## Section: Lands and Realty Actions

**Action Code**                      66200 Disposals

**Rationale Codes**                      600 Agency Lands

Comment #162

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0012	HUGHES	BRENDAN	

Alternative C does not dispose of any federal land. ..I don't believe that the federal government should be selling its land.

RESPONSE: FLPMA (43 USC 1701, Section 102(a)) states "the Congress declares that it is the policy of the United States that-(1) the public lands be retained in Public ownership, unless as a result of the land use planning procedure provided for in this Act, it is determined that the disposal of a particular parcel will serve the national interest." BLM disposes of land in several ways: selling of the land, exchanging the

land with other land owners, and R&PP lease and conveyance.

**Section: Special Area Designations**

**Action Code** 70000 Designations/Management (General)

**Rationale Codes** 4 Clarity of Information/Presentation

Comment #107

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0169	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

"Figure 3-12 shows the Special Designations in the Planning Area"

An ACEC expansion would appear to provide a more rational management structure for BLM lands in this area.

RESPONSE: Figure 3-12 of the DRMP/DEIS describes the special designations as they currently exist. The descriptions of plan alternatives as presented in Section 2.3.13.4 of the DRMP/DEIS does provide a range of alternatives that includes the expansion of both ACECs under several alternatives (see also Table 2-9 and Figures 2-6 through 2-9 of the PRMP/FEIS). Note that the total acreage under Alternatives B and E is lower than that shown for Alternative A, which is a result of removing the overlap between the ACEC and Wilderness Areas or Wilderness Study Areas. Please also note that under Alternatives B, C, and E, the In-Ko-Pah ACEC has been expanded to incorporate the Peninsular bighorn sheep critical habitat located to the south of the ACEC. This omission was an oversight and this revision achieves the original intention of the BLM.

Comment #139

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0173	BELENKY	LISA	CENTER FOR BIOLOGICAL DIVERSITY

...the preferred alternative removes the Carrizo Gorge Wilderness and Carrizo Gorge WSA from the In-Ko-Pah ACEC. DRMP/DEIS at 2-64,65.

RESPONSE: The acreage of existing ACEC which overlaps Wilderness Areas or

## 5.2 Public Comment Process

Wilderness Study Areas would be removed from ACEC designation since a double designation as an ACEC provides no additional protection then that afforded by the WA and WSA designations. The reason for the current overlapping designations is that the ACEC designations were made by BLM before Congress designated the WAs and WSAs.

**Rationale Codes**                      500 Recreation: General/Multiple/Other

Comment #188

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0119	SMITH	ROBERT	

A table indicating what types of public uses are allowed in each of the area designations [(SRMA, RMZ, WA, WSA, ACEC)] would also be useful

RESPONSE: The types of public uses and authorizations within Special Designations, SRMAs, and RMZs, are presented in Chapter 2 of the DRMP/DEIS.

**Rationale Codes**                      815 Scenery, Visual Resources

Comment #125

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0171	TISDALE	DONNA	BOULEVARD PLANNING GROUP

The proposed downgrade of the VRM classifications to accommodate industrial wind and geothermal facilities with their starkly intrusive, landscape and viewshed altering profiles are in no way compatible with the adjacent Carrizo Gorge Wilderness Area, Carrizo Gorge and Table Mountain Wilderness Study Areas, the In-Ko-Pah Mountains and Table Mountain Areas of Critical Environmental Concern, the Pacific Crest Trail, and locally impacted private rural properties.

RESPONSE: The Wilderness Management Policy (DOI BLM 1981b), Chapter II Management Policy for BLM-administered Wilderness, B.9 Buffer Zones and Adjacent Lands, states "No buffer zones will be created around Wilderness Areas to protect them from the influence of activities on adjacent land. The fact that nonwilderness activities or uses can be seen or heard from areas within the Wilderness shall not, of itself, preclude such activities or uses up to the boundary of the Wilderness Area.

When activities on adjacent lands are proposed, the specific impacts on those activities upon the wilderness resource and upon public use of the wilderness area will be addressed in environmental assessments or environmental impact statements as appropriate. Mitigation of impacts from outside wilderness will not be so restrictive as to preclude or seriously impede such activities.”

The authorization of a wind energy or geothermal facility is a subsequent implementation-level decision (rather than an RMP-level decision) and the NEPA process for any future applications for wind energy or geothermal must comply with this Wilderness Management Policy. The same policy would be applied to ACECs and other Special Designation areas, such as the Pacific Crest National Scenic Trail.

**Section: Special Area Designations**

**Action Code**      71000 Wilderness

**Rationale Codes**            100 Laws, policies

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
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Comment #175

EC-0084	WAGNER	CARMEN	
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Why are they opening up important Wilderness for Profit?

RESPONSE: Wilderness Area: An area formally designated by Congress as part of the National Wilderness Preservation System as defined in the Wilderness Act of 1964 (78 Stat.891), Section 2(c). In accordance to the Wilderness Act and BLM policy that Wilderness Areas are closed to all developmental activities, subject to valid existing rights existing at the time of Congressional Designation.

Comment #59

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0145	STEWART	JOHN	CALIFORNIA ASSOCIATION OF 4 WHEEL DRIVE CLUBS

There are concerns with the management prescription where WA (Wilderness Areas) and WSA (Wilderness Study Areas) appear to be grouped into the same management prescription: restrictive and all managed as wilderness.

## 5.2 Public Comment Process

RESPONSE: BLM must manage designated Wilderness Areas in accordance with the Wilderness Act of 1964 (78 Stat. 891) and Wilderness Study Areas in accordance with BLM's Interim Management Policy and Guidelines for Lands Under Wilderness Review (H-8550-1).

### Comment #61

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0145	STEWART	JOHN	CALIFORNIA ASSOCIATION OF 4 WHEEL DRIVE CLUBS

"no Federal lands shall be designated as 'wilderness areas' except as provided for in [the Wilderness Act] or by a subsequent Act." Id. Section 1131 (a). ... To this end, the Wilderness Act removed the federal agency discretion to establish de facto administrative wilderness areas, a practice the executive branch had engaged in for over forty years.

RESPONSE: FLPMA of 1976 Section 603 requires BLM to inventory and make recommendations to the Congress, areas suitable for designation as Wilderness. In 1996, the State of Utah, Utah School Institutional Trust Land Administration, and the Utah Association of Counties (collectively Plaintiffs) filed suit challenging the Bureau of Land Management's (BLM) authority to re-inventory lands for possible wilderness study area designation in Utah (Utah v. Norton). A settlement to this suit was reached in April 2003 between the Department of the Interior and the Plaintiffs. Consistent with BLM policies for the identification, management and protection of multiple uses, terms of the settlement have been applied Bureau-wide.

BLM is a multiple use agency committed to the balanced stewardship of public lands. The policies stemming from the settlement acknowledge that Congress established a deadline for BLM's authority to designate Wilderness Study Areas (WSAs) which are then managed under the non-impairment provisions of Section 603 of the Federal Land Policy and Management Act (FLPMA). Although Congress ended BLM's authority to designate WSAs in 1993, BLM retains its Section 201 FLPMA authority to inventory resources or other values, including areas with wilderness characteristics such as naturalness, or those that offer solitude and are conducive to primitive, unconfined recreation. Through its land use planning process, BLM will consider all available information to determine the mix of resource use and protection that best serves the FLPMA multiple use mandate.

Following expiration of the Section 603(a) process, there is no general legal authority for the BLM to designate lands as WSAs for management pursuant to the non-impairment standard prescribed by Congress for Section 603 WSAs. FLPMA land use plans completed after April 14, 2003 will not designate any new WSAs, nor manage any additional lands under the Section 603 non-impairment standard.

**Rationale Codes**                      160 Agency Rules, Plans, Policies

Comment #25

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0151	WEINER	TERRY	DESERT PROTECTIVE COUNCIL

The DPC opposes use of motorized vehicles in the 2 wilderness areas for construction or maintenance of any sort. We support strict adherence to the stipulations of the Wilderness Act, which allows the use of motorized equipment in wilderness for emergencies only...

The DPC opposes vehicular use by CDFG personnel to game water facilities for operation and maintenance activities in Wilderness Areas. We also oppose the construction of artificial water sources in wilderness.

RESPONSE: Section 103(f) of the California Desert Protection Act of 1994 which states "Management activities to maintain or restore fish and wildlife populations and the habitats to support such populations may be carried out within wilderness areas designated by this title and shall include the use of motorized vehicles by the appropriate State agencies." This allows CDFG to use mechanized equipment to maintain wildlife waters in the Wilderness.

Comment #232

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0175	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

We believe you should discuss the current efforts to designate additional area in the planning area as wilderness.

RESPONSE: BLM does not have the authority to designate new Wilderness or Wilderness Study Areas. In the event that additional lands are designated as

## 5.2 Public Comment Process

Wilderness by Congress within the Planning Area, the BLM-administered lands within the newly designated wilderness would be managed in accordance with the designation authority. Section 2.3.13.1.1 of the DRMP/DEIS has been revised to include this language.

Comment #266

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0212	SCHORADT	BRENT	CALIFORNIA WILDERNESS COALITION

Impact to scenic views and wilderness experience in two adjacent wilderness areas

RESPONSE: The Wilderness Management Policy (DOI BLM 1981b), Chapter II Management Policy for BLM-administered Wilderness, B.9 Buffer Zones and Adjacent Lands, states “No buffer zones will be created around Wilderness Areas to protect them from the influence of activities on adjacent land. The fact that nonwilderness activities or uses can be seen or heard from areas within the Wilderness shall not, of itself, preclude such activities or uses up to the boundary of the Wilderness Area.

When activities on adjacent lands are proposed, the specific impacts on those activities upon the wilderness resource and upon public use of the wilderness area will be addressed in environmental assessments or environmental impact statements as appropriate. Mitigation of impacts from outside wilderness will not be so restrictive as to preclude or seriously impede such activities.”

The authorization of a wind energy facility is a subsequent implementation-level decision (rather than an RMP-level decision) and the NEPA process for any future applications for wind energy must comply with this Wilderness Management Policy.

**Rationale Codes**                      641 Wind Energy

Comment #179

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0095	CALHOUN	VICTORIA	

Please do not put turbines in more of our wilderness

RESPONSE: Wilderness Area: An area formally designated by Congress as part of the National Wilderness Preservation System as defined in the Wilderness Act of 1964 (78 Stat.891), Section 2(c). In accordance to the Wilderness Act and BLM policy that Wilderness Areas are closed to all developmental activities, subject to valid existing rights existing at the time of Congressional Designation.

Comment #180

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0096	ENNS	ROBERT E.	

Hands off this .. wilderness areas you are supposed to protect, not ruin!

RESPONSE: Wilderness Area: An area formally designated by Congress as part of the National Wilderness Preservation System as defined in the Wilderness Act of 1964 (78 Stat.891), Section 2(c). In accordance to the Wilderness Act and BLM policy that Wilderness Areas are closed to all developmental activities, subject to valid existing rights existing at the time of Congressional Designation.

**Section: Special Area Designations**

**Action Code**      71100 Study Areas

**Rationale Codes**                      4 Clarity of Information/Presentation

Comment #28

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0151	WEINER	TERRY	DESERT PROTECTIVE COUNCIL

Rather than allowing recreational motorized vehicles and other motorized equipment on "existing ways" within the WSAs and on the boundary roads of WSAs, we encourage the BLM to exclude motorized activity from WSAs as the best means of protecting the wilderness qualities of the plants, soil, waters and air quality of the WSAs from degradation.

RESPONSE: Section 603 (c) of FLPMA requires BLM to assure that ongoing management actions in WSAs do not "... impair their suitability for preservation as

5.2 Public Comment Process

wilderness.” Management to the nonimpairment standard does not mean that the lands will be managed as though they had already been designated as wilderness. For example, some uses that could not take place in a designated wilderness area may be permitted under the Interim Management Policy (IMP) because they are only temporary uses that do not create surface disturbance or involve permanent placement of structures (BLM Handbook H-8550-1 – Interim Management Policy For Lands Under Wilderness Review).

As indicated in Implementation Level Decisions: Routes of Travel section of the PRMP/FEIS, routes of travel in WSAs would be limited to non-mechanized and non-motorized use except for administrative purposes.

**Rationale Codes**                      100 Laws, policies

Comment #67

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0145	STEWART	JOHN	CALIFORNIA ASSOCIATION OF 4 WHEEL DRIVE CLUBS

For instance, the agency's Interim Management Policy for lands under wilderness review (the "IMP") authorizes travel along "ways" even in Wilderness Study Areas (WSAs) meeting certain conditions. Many of these 'ways', whether they exist within WSA's or BLM lands are popular and legitimate 'routes' utilized by public lands visitors for full sized 4x4 OHV recreation. ...Planning guidance must recognize this history and allow for the incorporation of legal 'ways' into comprehensive travel management plans.

RESPONSE: Section 603 (c) of FLPMA requires BLM to assure that ongoing management actions in WSAs do not “... impair their suitability for preservation as wilderness.” Management to the nonimpairment standard does not mean that the lands will be managed as though they had already been designated as wilderness. For example, some uses that could not take place in a designated wilderness area may be permitted under the Interim Management Policy (IMP) because they are only temporary uses that do not create surface disturbance or involve permanent placement of structures (BLM Handbook H-8550-1 – Interim Management Policy for Lands Under Wilderness Review).

As indicated in Implementation Level Decisions: Routes of Travel section of the PRMP/FEIS, routes of travel in WSAs would be limited to non-mechanized and non-

motorized use except for administrative purposes.

**Rationale Codes**                      160 Agency Rules, Plans, Policies

Comment #39

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0155	GROSSGLASS	MEG	OFF-ROAD BUSINESS ASSOCIATION

By closing existing routes of travel in the 5 WSAs you are essentially making a wilderness area without congress formally designating it as wilderness.

RESPONSE: Section 603 (c) of FLPMA requires BLM to assure that ongoing management actions in WSAs do not "... impair their suitability for preservation as wilderness." Management to the nonimpairment standard does not mean that the lands will be managed as though they had already been designated as wilderness. For example, some uses that could not take place in a designated wilderness area may be permitted under the Interim Management Policy (IMP) because they are only temporary uses that do not create surface disturbance or involve permanent placement of structures (BLM Handbook H-8550-1 – Interim Management Policy for Lands Under Wilderness Review).

As indicated in Implementation Level Decisions: Routes of Travel section of the PRMP/FEIS, routes of travel in WSAs would be limited to non-mechanized and non-motorized use except for administrative purposes.

Comment #138

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0173	BELENKY	LISA	CENTER FOR BIOLOGICAL DIVERSITY

By allowing even limited use of motor vehicles or other mechanized transport within the WSAs as ... is proposed under each alternative, the wilderness characteristics of the WSAs are likely to degrade instead of being preserved. This is incongruous with the non-impairment standard set forth for WSAs in FLPMA.

RESPONSE: Section 603 (c) of FLPMA requires BLM to assure that ongoing management actions in WSAs do not "... impair their suitability for preservation as wilderness." Management to the nonimpairment standard does not mean that the

## 5.2 Public Comment Process

lands will be managed as though they had already been designated as wilderness. For example, some uses that could not take place in a designated wilderness area may be permitted under the Interim Management Policy (IMP) because they are only temporary uses that do not create surface disturbance or involve permanent placement of structures (BLM Handbook H-8550-1 – Interim Management Policy for Lands Under Wilderness Review).

As indicated in Implementation Level Decisions: Routes of Travel section of the PRMP/FEIS, routes of travel in WSAs would be limited to non-mechanized and non-motorized use except for administrative purposes.

### **Rationale Codes**                      400 Roads and Trails, Trans System

Comment #60

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0145	STEWART	JOHN	CALIFORNIA ASSOCIATION OF 4 WHEEL DRIVE CLUBS

Closing those routes of travel and applying rehabilitation actions is in fact changing the land characteristic before the lands can be properly evaluated for their true wilderness characteristics.

RESPONSE: Section 603 (c) of FLPMA requires BLM to assure that ongoing management actions in WSAs do not "... impair their suitability for preservation as wilderness." Management to the nonimpairment standard does not mean that the lands will be managed as though they had already been designated as wilderness. For example, some uses that could not take place in a designated wilderness area may be permitted under the Interim Management Policy (IMP) because they are only temporary uses that do not create surface disturbance or involve permanent placement of structures (BLM Handbook H-8550-1 – Interim Management Policy for Lands Under Wilderness Review).

As indicated in Implementation Level Decisions: Routes of Travel section of the PRMP/FEIS, routes of travel in WSAs would be limited to non-mechanized and non-motorized use except for administrative purposes.

**Section: Special Area Designations**

**Action Code** 73000 ACECs (RNAs, ONAs, Etc.)

**Rationale Codes** 160 Agency Rules, Plans, Policies

Comment #265

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0212	SCHORADT	BRENT	CALIFORNIA WILDERNESS COALITION

Carrizo Gorge and the Sawtooth Mountain potential wilderness (see maps enclosed).

CWC requests that the proposed ACEC in Alt E be extended south so that it includes all of the Carrizo Gorge Potential Wilderness as shown on the attached map. The DEIS fails to contain alternatives that includes the entire Carrizo Gorge potential wilderness as an Area of Critical Environmental Concern.

RESPONSE: In the event that additional lands are designated as Wilderness by Congress within the Planning Area, the BLM-administered lands within the newly designated wilderness would be managed in accordance with the designation authority. Section 2.3.13.1.1 of the DRMP/DEIS has been revised to include this language. BLM Manual Section 1613 - Areas of Critical Environmental Concern, subsection .06, policy states that "An ACEC designation will not be used as a substitute for wilderness suitability recommendations." In accordance with this policy, BLM is not permitted to designate an ACEC as a "placeholder" for the potential future designation of Wilderness.

Comment #1

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0220	ANONYMOUS		

Double protection -- under both ACEC and WSA -- is better than single protection under either one. Therefore, the BLM is doing the land and the citizenry a disservice by attempting to end ACEC status for thousands of acres in and around McCain Valley and the In-Ko-Pah Mountains. There is a reason it was placed under that protective status, and that reason has not gone away.

RESPONSE: The acreage of existing ACEC which overlaps Wilderness Areas or

5.2 Public Comment Process

Wilderness Study Areas would be removed from ACEC designation since a double designation as an ACEC provides no additional protection then that afforded by the WA and WSA designations. The reason for the current overlapping designations is that the ACEC designations were made by BLM before Congress designated the WAs and WSAs.

**Rationale Codes** 710 Potential for Special Designation

Comment #35

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0154	MARSHALL	JOE	JACUMBA COMMUNITY SERVICES DISTRICT

The areas I am concerned with are the O'Neill Valley and the De Anza Springs Resort (also referred to in BLM documents as the Airport Mesa area) be designated by the BLM as an Area of Critical Environmental Concern.

I am particularly concerned about the following issues:

a) Impacts to groundwater. Adverse impacts from geothermal energy production could include depletion and contamination of important groundwater resources. This is of great concern, as the country town of Jacumba is entirely dependent upon groundwater.

b) Impacts to local hot springs. Jacumba, historically known as "Jacumba Hot Springs," would also be adversely affected if geothermal activity were to affect the flow and temperature of the area's unique underground hot springs.

c) Incompatibility with residents. Industrial development, including energy facilities and infrastructure, is inconsistent with the residential and rural character of the Jacumba area and would have an adverse impact on existing residents and small businesses.

RESPONSE: An ACEC (Area of Critical Environmental Concern) is defined as an area within the public lands where special management attention is required to prevent irreparable damage to important historic, cultural, or scenic values, or other natural systems or processes, or to protect life and safety from natural hazards.

43 CFR 1610.7-2 states that in order to be a potential ACEC, both of the following criteria shall be met:

1. Relevance. There shall be present a significant historic, cultural, or scenic value; a fish or wildlife resource or other natural system or process; or natural hazard.

2. Importance. The above described value, resource, system process, or hazard shall have substantial significance and values. This generally requires qualities of more than local significance and special worth, consequence, meaning, distinctiveness, or cause for concern. A natural hazard can be important if it is a significant threat to human life or property.

BLM explored the idea of creating an ACEC on BLM-administered lands within the Planning Area in the vicinity of Jacumba at Airport Mesa. BLM reviewed existing data on the cultural, historic, visual and biological resources in the area to determine if any met the Relevance and Importance criteria. There is an existing utility corridor with a 500kv transmission line passing through BLM lands south of Interstate 8 that BLM plans to continue to utilize. Also being along the international border, Airport Mesa is strategically important to the US Border patrol for enforcement of the border areas.

This area is also very important for recreational target shooting. Based on current information, Airport Mesa does contain resource cultural, historic, visual and biological resource values, however the area does not meet the Relevance and Importance criteria needed for ACEC designation. Special management attention is not required to accomplish the level of protection necessary for this area.

Comment #131

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0172	CALLAHAN	JAMES M.	JACUMBA SPONSOR GROUP

request that the greater Jacumba area be designated by the BLM as an "Area of Critical Environmental Concern" or ACEC.

## 5.2 Public Comment Process

We are particularly concerned about the following issues:

a) Impacts of geothermal energy production. The environmental study (EIS) does not adequately address the potential impacts of geothermal leasing despite its finding that 80,240 acres of land around the Jacumba area are "prospectively valuable for geothermal resources." These potential impacts include effects on groundwater, visual and community impacts.

b) Impacts to groundwater. Adverse impacts from geothermal energy production could include depletion and contamination of important groundwater resources. This is of great concern, as the country town of Jacumba is entirely dependent upon groundwater.

c) Impacts to local hot springs. Jacumba, historically known as "Jacumba Hot Springs," would also be adversely affected if geothermal activity were to affect the flow and temperature of the area's unique underground hot springs.

d) Incompatibility with residents. Industrial development, including energy facilities and infrastructure, is inconsistent with the residential and rural character of the Jacumba area and would have an adverse impact on existing residents and small businesses.

e) Negative affect on tourism and the local economy. Tourism, which is vital to the town of Jacumba, could be adversely affected by impacts to the hot springs and the installation of industrial uses such as energy facilities. Jacumba is located on historic Highway 80, which was recently designated by the State of California as a State Historic Highway. The town's economic revitalization strategy is based in great part on increasing tourism along Highway 80 in the future.

f) Visual impacts. As a historically significant community, Jacumba should be protected from visual impacts of energy generation facilities that are inconsistent with the character of the community.

g) Insufficient study of impacts to Jacumba. The EIS contains insufficient analysis or

study of these potential environmental, social and economic impacts in our area.

h) Lack of public information and citizen participation. Our Sponsor Group had only one week to review and respond to the RMP/EIS. Further study and public input should be sought by the BLM.

RESPONSE: An ACEC (Area of Critical Environmental Concern) is defined as an area within the public lands where special management attention is required to prevent irreparable damage to important historic, cultural, or scenic values, or other natural systems or processes, or to protect life and safety from natural hazards.

43 CFR 1610.7-2 states that in order to be a potential ACEC, both of the following criteria shall be met:

1. Relevance. There shall be present a significant historic, cultural, or scenic value; a fish or wildlife resource or other natural system or process; or natural hazard.

2. Importance. The above described value, resource, system process, or hazard shall have substantial significance and values. This generally requires qualities of more than local significance and special worth, consequence, meaning, distinctiveness, or cause for concern. A natural hazard can be important if it is a significant threat to human life or property.

BLM explored the idea of creating an ACEC on BLM-administered lands within the Planning Area in the vicinity of Jacumba at Airport Mesa. BLM reviewed existing data on the cultural, historic, visual and biological resources in the area to determine if any met the Relevance and Importance criteria. There is an existing utility corridor with a 500kv transmission line passing through BLM lands south of Interstate 8 that BLM plans to continue to utilize. Also being along the international border, Airport Mesa is strategically important to the US Border patrol for enforcement of the border areas.

This area is also very important for recreational target shooting. Based on current information, Airport Mesa does contain resource cultural, historic, visual and biological resource values, however the area does not meet the Relevance and Importance criteria needed for ACEC designation. Special management attention is not required to accomplish the level of protection necessary for this area.

### Section: Special Area Designations

**Action Code** 74000 National Scenic Roads, Trails and Backcountry Byways

**Rationale Codes** 4 Clarity of Information/Presentation

Comment #233

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0175	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

We believe the planning should include discussion with and consultation with PCTA and coordination to protect the objectives of the trail.

RESPONSE: BLM does not manage the Pacific Crest NST. Management authority lies with the U.S. Forest Service in accordance with Public Law 90-43; October 2, 1968. As 15 miles of the trail occur on BLM-administered lands within the Planning Area, BLM coordinates with the USFS in accordance with an MOU.

### Section: Special Area Designations

**Action Code** 76000 Other Special Designations

**Rationale Codes** 815 Scenery, Visual Resources

Comment #155

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0004	STRAND	MICHELE	

Old Highway 80 has just been designated an historic route

RESPONSE: A short discussion has been added to Section 3.9.5 to reflect this

comment.

**Section: Social and Economic**

**Action Code 81000 Social/Economic Analysis**

**Rationale Codes** 4 Clarity of Information/Presentation

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
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Comment #224

EC-0175	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE
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If the Planning Area is 533,000 acres it is one fifth (1/5) of San Diego County (2,727,000 acres) not one fourth. Also if BLM is managing 103,303 acres we calculate that at 19.4% of the 533,000 acres.

RESPONSE: The referenced information from Section 3.19.1.1 of the DRMP/DEIS has been updated to state: "Within the 533,000-acre Planning Area the BLM has about 103,000 acres under its management. Therefore, the Planning Area represents about one-fifth of San Diego County, and the acreage under BLM's control represents about one-fifth (about 19%) of the Planning Area or about 4 percent of the total acreage within San Diego County."

**Rationale Codes** 800 Social Conditions/Values General (Including

Comment 2

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
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EC-0220	ANONYMOUS		
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I was unable to find any discussion of the lifestyles and values of the residents of Boulevard, Live Oak Springs, Jacumba, and vicinity, which are the only places in the planning area that will suffer a severe impact from the changes written into the Draft RMP.

RESPONSE: Specific demographic data for the communities of Boulevard and Jacumba have been added to Section 3.19.1.1 of the DRMP/DEIS. A general description of the current population of residents within the Planning Area has been added to Section 3.19.1.

## 5.2 Public Comment Process

Note that any site-specific projects proposed in the vicinity of these communities would require a separate NEPA analysis at the time the specific action is proposed, which would include analysis of any Social Justice issues affiliated with the specific project.

### **Rationale Codes**                      850 Demographics

Comment #130

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0171	TISDALE	DONNA	BOULEVARD PLANNING GROUP

According to San Diego MLS real estate website, Boulevard and Jacumba have a per capita income of \$17,213 (see attached MLS printout for Boulevard 91905 and Jacumba 91934) (Ex. 10).

The San Diego Association of Government page shows a median household income for Boulevard 91905 at \$39,886, with a population including 437 Hispanic, 624 white, 74 American Indian, and 51 listed as other. Only 40% of the adult population, 25 and older, graduated high school. Boulevard's poverty rate is 25 percent (SANDAG population and housing 2000 (Census) - 2006 (estimates)(Ex. 19).

San Diego County fares better overall with a median per capita income of \$22,296, a poverty rate of 12.6 percent, and an adult high school graduate rate of 82.6 percent (US Census Bureau, Census 2000 Demographic Profile Highlights-San Diego County, CA - Fact Sheet) (Ex. 20).

RESPONSE: The above comments that residents of the Boulevard community have generally lower incomes, higher rates of poverty, less education, and higher unemployment rates than the rest of the County of San Diego are correct. However, the median estimated household income for Boulevard was \$50,919 as of January 1, 2006 not \$39,886 as reported above (SANDAG; ZIP=91905). The median countywide household income was \$64,737 as of January 1, 2006. The median ages of the Boulevard and Jacumba residents are older than the County population as is stated in Section 3.19.1.1.1 of the DRMP/DEIS, with a significantly larger proportion of the population over 65 years of age (13% and 18%, v. 11%). The Boulevard and Jacumba residents include a significantly larger proportion of American Indians than the County (6% and 7%, v. 0.5%). The Boulevard and Jacumba communities also reported a poverty rate of about twice the countywide rate (25% and 22% v. 13%). This demographic and poverty information has been included in the PRMP/FEIS.

**Section: Social and Economic Setting**

**Action Code** 83000 Environmental Justice

**Rationale Codes** 4 Clarity of Information/Presentation

Comment #129

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0171	TISDALE	DONNA	BOULEVARD PLANNING GROUP

Environmental Justice is an issue that needs to be addressed not ignored:...

RESPONSE: In general, the alternatives evaluated in the DRMP/DEIS would affect residents throughout San Diego County. BLM’s environmental justice determination is that none of the proposed alternatives would result in a disproportionate significant adverse impact on any low-income and/or minority communities within the region. Section 4.19.1 of the DRMP/DEIS has been revised to include this determination.

**Section: Social and Economic Setting**

**Action Code** 84000 Border Related Issues

**Rationale Codes** 862 Resource Damage

Comment #96

Let. #	LAST NAME	FIRST, MI	ORGANIZATION NAME
EC-0160	THOMETZ	MICHAEL C.	MOUNTAIN EMPIRE RESOURCES INFORMATION TASKFORCE

4.5.5 Unavoidable Adverse Impacts (pg. 4-17). Does the heavy volume of illegal immigrant traffic moving through portions of the planning area qualify as an unavoidable adverse impacts? Does it constitute law enforcement activity? While the issue of Homeland Security and illegal immigrants is barely mentioned in the planning document those issues should be addressed.

RESPONSE: The unavoidable adverse impacts from border issues have been added to the impacts sections for Soil Resources (Section 4.3.3), Water Resources (Section 4.4.4), Vegetative Resources (Section 4.5.5), Wildlife Resources (Section 4.6.7), Special Status Species (Section 4.7.3), Cultural Resources (Section 4.9.3), Visual Resources (Section 4.11.5), and Special Designations (Sections 4.12.1.3, 4.12.2.2, 4.12.4.3). A discussion of border –related issues is already included in the Wildland Fire Management Section 4.8.1.5.

## *5.2 Public Comment Process*

In addition, Impacts to Public Health and Safety, Section 4.13, has been revised to further clarify international border issues.

## 5.3 List of Preparers

Though individuals have primary responsibility for preparing sections of the PRMP/FEIS, the document is an interdisciplinary team effort. In addition, internal review of the document occurs throughout preparation. Specialists at the BLM's field office, state, and Washington office levels review the analysis and supply information, as well as provide document preparation oversight. Contributions by individual preparers may be subject to revision by other BLM specialists and by management during internal review.

**TABLE 5-1  
LIST OF PREPARERS**

<b>Name</b>	<b>Job Title</b>	<b>Years of Expertise</b>	<b>Primary Responsibility</b>
<b>BLM-EI Centro Field Office</b>			
Beal, Jabe	Park Ranger	2	Recreation; Routes of Travel
Dreyfuss, Erin	Environmental Protection Specialist	3	Grazing; Vegetation; NEPA Coordination
Johnson, John	Wilderness Coordinator	3	Wilderness; Special Designations; Visual Resources
Kastoll, Lynda	Realty Specialist	28	Lands and Realty
Meeks, Dallas	Outdoor Recreation Planner	13	Recreation; Routes of Travel
Self, Linda	Realty Specialist	17	Land Tenure
Simmons, Carrie	Field Office Archaeologist	4	Cultural Resources
Steward, Daniel	Resources Staff Chief	4	Wildlife; Vegetation; GIS Support
Taylor, Gary	NEPA Coordinator	20	NEPA Coordination
Todd III, Walter "Buzz"	Field Office Geologist	20	Mining; Geology; Paleontology
Wood, Vicki	Field Manager	10	Management Oversight
Zale, Thomas	Associate Field Manager	28	Project Coordination
<b>BLM-California Desert District Office</b>			
LaPre, Larry	District Wildlife Biologist	27	Wildlife
Dalton, John	Resource Management Specialist	15	Planning; Review
Queen, Rolla	District Archaeologist	28	Cultural Resources
Roholt, Chris	Wilderness/NLCS Coordinator	28	Wilderness; Special Designations
Stein, Alan	Deputy District Manager, Resources	33	Planning; Review

**TABLE 5-1  
LIST OF PREPARERS (CONT.)**

<b>Name</b>	<b>Job Title</b>	<b>Years of Expertise</b>	<b>Primary Responsibility</b>
<b>BLM-California Desert District Office (cont.)</b>			
Waiwood, Robert	District Geologist; Mineral Examiner	33	Mineral Resources; Paleontology
<b>BLM-California State Office</b>			
Ilano, Eliseo	Planning and Environmental Coordinator	8	Planning; Review
McGinnis, Sandra	Planning and Environmental Coordinator	17	Planning, Review
Willoughby, John	State Botanist	30	Priority and Special Status Plants; Native American Plant Collection
<b>BLM-South Coast Prescribed Fire Module</b>			
Gannon, James	South Coast Fuels Crew	12	Wildland Fire Management
<b>BLM-Palm Springs-EI Centro Fire Management Zone</b>			
Howe, Clayton R.	Fire Mitigation Education Specialist	31	Wildland Fire Management
<b>RECON Environmental, Inc. and Associates</b>			
Benn, Candie	Client Care Program Manager	20	Client Liaison
Blocker, Eija	Production Specialist	18	Editing, Formatting, and Production of Deliverables
Fromer, Paul	Environmental and Conservation Planner	26	Principal in Charge
Hull, Warren L. "Skip"	Director of Economic Analysis, CIC Research, Inc.	30	Economic Analysis
Johnson, Cheryl	Environmental Planner	6	Writer/Editor; Air, Soil, Water Resources
Loeffler, Wendy	Senior Biologist	13	Project Manager; Writer/Editor; Biological Resources
Morales, Susy	Wildlife Biologist	12	Writer/Editor; Wildlife
Simmons, Gregg	Manager, Simmons Environmental and Natural Resource Consulting, LLC	31	Environmental Planner and Technical Advisor
Taylor, Drew	GIS Analyst	3	GIS and Graphic Support
Underwood, Jackson	Archaeologist	22	Cultural Resources
Woods, Lori Jones	Environmental Planner, Landscape Architect	27	Visual Resources