



# The Cronan Ranch

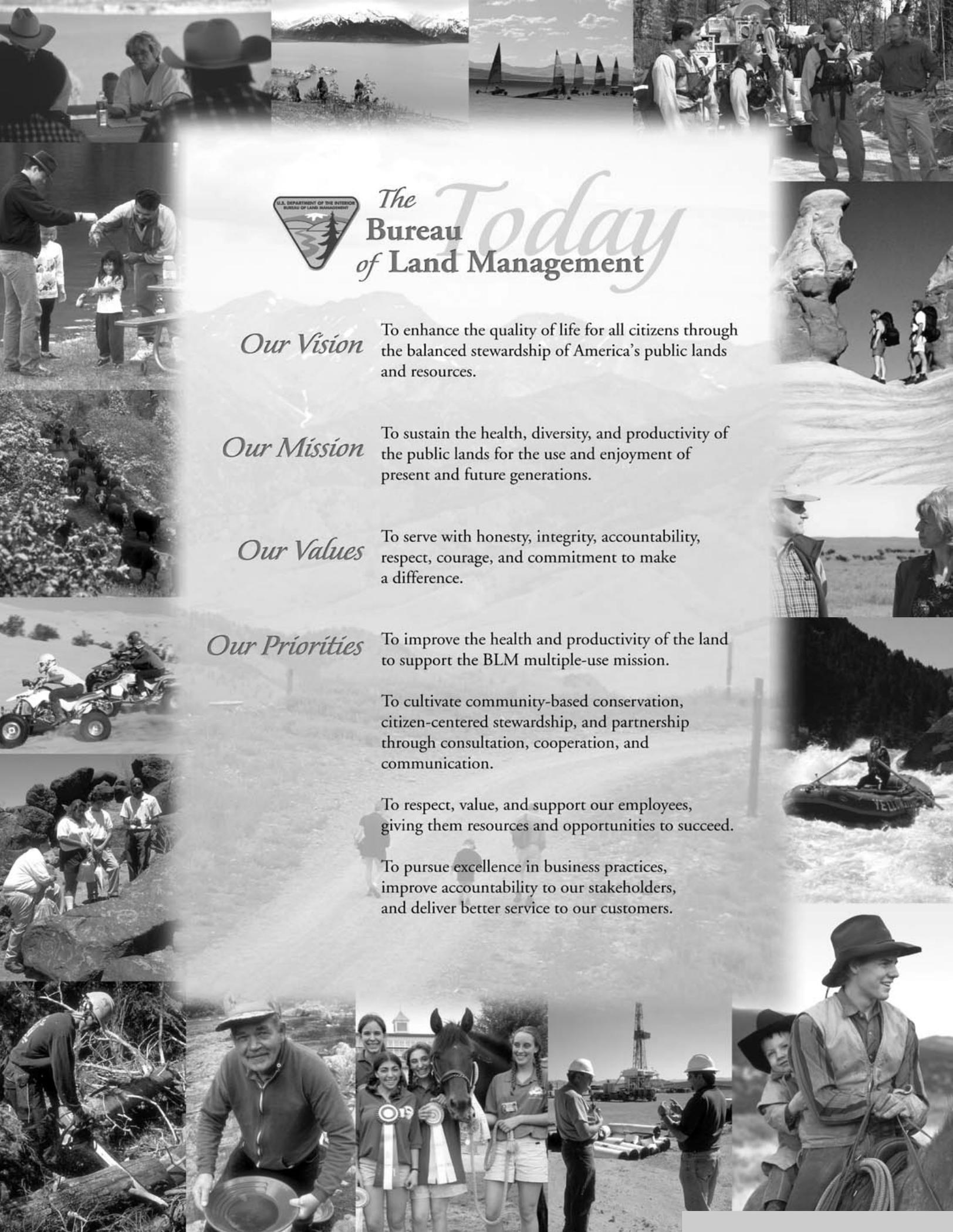
## A Management Plan

Bureau of Land Management  
Folsom Field Office  
February, 2007



Folsom Field Office





# The Bureau of Land Management *Today*

## *Our Vision*

To enhance the quality of life for all citizens through the balanced stewardship of America's public lands and resources.

## *Our Mission*

To sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.

## *Our Values*

To serve with honesty, integrity, accountability, respect, courage, and commitment to make a difference.

## *Our Priorities*

To improve the health and productivity of the land to support the BLM multiple-use mission.

To cultivate community-based conservation, citizen-centered stewardship, and partnership through consultation, cooperation, and communication.

To respect, value, and support our employees, giving them resources and opportunities to succeed.

To pursue excellence in business practices, improve accountability to our stakeholders, and deliver better service to our customers.

# **The Cronan Ranch**

## **A Management Plan**



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# **Cronan Ranch**

## **A Management Plan**

### **Description of the Area**

The 1400-acre Cronan Ranch parcel is located along the South Fork of the American River in El Dorado County. It contains varied terrain which ranges from relatively flat to quite steep. Vegetation includes blue oak savannah, foothill woodland, and riparian areas. There are 12 miles of trails for hiking, biking, horseback riding, fishing, bird watching, and other recreation activities. There is a significant population of noxious weeds, especially yellow-star thistle and medusa head. Beaches along the river have long been used by rafters as a lunch spot, with some picnic-related facilities. The previous land owners allowed hunting access. The property has been the location for several Hollywood productions. A private portion of the property, about 60 acres, will be managed by the County.

The parcel borders on State Highway 49 and the South Fork American River, and lies between the Greenwood Creek and Norton Ravine parcels.

### **Present Management Situation**

Prior to acquisition by the BLM, the Cronan Ranch parcel was used since the 1890s for livestock grazing. Following acquisition, the Cronan Ranch became subject to the *South Fork American River Management Plan*, adopted in 2004 (SFARMP), and by stipulations and restrictions posed by the seller, American River Conservancy (ARC), and accepted by the purchaser (BLM). The SFARMP stipulated that newly-acquired parcels would automatically become part of the South Fork American River Special Management Area, subject to management guidelines and planning decisions associated with the nearest, or most similar, Special Management Area parcel of public land, whichever is most appropriate. For the Cronan Ranch, this would be the Greenwood Creek parcel. The SFARMP also stipulated that new parcels would be closed to mineral entry or location under the General Mining laws for a period of 50 years, except in cases of national emergency.

### **Vision Statement**

The Cronan Ranch will be managed to preserve open space for public use and to restore and enhance plant and wildlife habitats. Reasonable public access to the river and the land will accommodate a wide range of uses including but not limited to recreational and educational experiences that are consistent with resource protection. Public land management will respect and protect private property rights, and balance competing uses. Education will be an important aspect of public land management. Cultural resources, including both prehistoric and historic, will be protected and enhanced. The Cronan Ranch will be managed in a fashion that recognizes human needs through a partnership with the BLM, El Dorado County, the community, and other relevant agencies.

## Management Actions

Items and issues not covered in this plan will be guided by the SFARMP, the Sierra MFP, and by general BLM policies as appropriate.

### Bio-diversity

Biodiversity is defined as the full variety of life and its associated patterns and processes. It includes the variety of living organisms, the genetic differences between them, and the communities and ecosystems in which they occur. In general, the more diverse an ecosystem is, the more stable it is. For the South Fork American, this means that a mosaic of all habitat types common to the area and typical of this elevation in the Western Sierra Nevada will be encouraged and maintained. This will include a variety of plant communities in different stages of succession.

1. Develop vegetative management plan for open and wooded areas on the Cronan Ranch.
2. Encourage shade areas with native trees, such as oaks, pines, and willows. Balance management for the different species of plants and animals with consideration for various stages of succession. Do not favor one over the other. Emphasize and encourage ecotones.
3. Maintain and manage for scenic vistas.

### Oak Woodlands

Oaks are very important for influencing vegetation growth patterns and for wildlife. It is the policy of the BLM to encourage, expand, and maintain oak woodlands.

### Riparian Communities

Riparian plant communities are ecologically very important. They are productive for wildlife, and help prevent erosion. All identified perennial and intermittent streams as well as other wetlands (ponds, seeps, springs, etc.) will be managed to maintain, or enhance water quality and biological productivity.

Commercial use of riparian areas by river outfitters will be confined to one area to reduce riparian impacts on other areas. Leveling or other landscape modifications will not be allowed. River outfitters will be allowed to weed-eat lunch areas for their guests.

### Threatened or Endangered Species

By law, all plants or animals identified as threatened or endangered by the Federal Government, or as rare or endangered by the State of California, will be given special preference for protection and management. Candidate species for federal or state listing will also be given special attention.

### Noxious Weeds

All known populations of noxious weeds will be treated for eradication or reduced rates of spread. All methods of weed treatment may be considered including manual, mechanical, biological, and chemical methods. Trails will receive priority for treatment, which will include removal of star thistle and poison oak five within five feet of trails where practical. Weed free feed would be required if horses are fed on Cronan Ranch.

Fill dirt, sand/gravel, straw and seed or plants used on the Cronan Ranch will be weed free. Construction equipment will be cleaned prior to entering project areas.

If it is determined that vehicles are causing noxious weeds to increase on the Cronan Ranch, vehicle use may be further reduced.

### Vehicle Access and Use

Motorized vehicle access by visitors will be confined to the Cronan Ranch parking lot.

Exceptions to this rule include: Federal, State, or local officers or employees in the scope of their duties; and members of any organized rescue or fire-fighting force in performance of an official duty; and other persons, such as commercial outfitters and recreational gold dredgers, who have obtained proper authorization from the BLM.

### Commercial Permits

1. Commercial permits will be issued on an annual basis. The BLM shall set a daily use capacity for commercial activity, and, if necessary, will adjust levels of commercial use to reduce environmental impacts. Adjustments will be made, based on monitoring, using adaptive management.
2. The number of commercial permits and users shall be adequate to meet public demand without adverse social and environmental impacts. If necessary, the BLM will reduce the number of permits by not allowing companies to transfer their use of the property when their companies are sold to another party.
3. The BLM will monitor commercial use and adjust the number of permits and/or use as needed, based on monitoring and carrying capacity thresholds.
4. Commercial outfitter sites shall be grouped together in the Permittee Zone. No existing commercial outfitter will be assigned a permanent camp location. Camp location will be rotated on an annual basis. Shade structures will be allowed for food preparation. Picnic tables will be allowed, but will be phased out within five years. All structures will be removed by October 1 each year.
5. Portable toilet facilities shall be phased out and replaced with permanent facilities.
6. From July First until Labor Day, commercial outfitters must have six or more boats on the river to qualify for using support vehicles for lunching purposes. Vehicle speed will be 15 mph.

7. Commercial kayakers will be allowed to take-out, but not put-in on the Cronan Ranch.
8. On a case-by-case basis, the BLM may authorize a put-in/take-out request by a permitted outfitter who has fewer than six boats on the river. Decisions will be consistent with overall vision of the property.

#### Special events/competitive events/organized groups

Special use permits for special events or organized groups may be issued on a case-by-case basis consistent with the overall vision for the parcel.

#### Film Permit Proposals

1. Commercial filming permits may be issued on a case-by-case basis consistent with the overall vision of the property.
2. Monitor all commercial filming activities closely.
3. Pre-prepare a standard Environmental Analysis for commercial filming at the Cronan Ranch that identifies appropriate sites, areas where filming is inappropriate, and mitigation measures.
4. Work with local film commission to help implement a professional film permitting program in conjunction with local government and integrate environmental review into the planning process.
5. The existing structures on the Cronan Ranch from previous films will be removed for public safety reasons.

#### Recreational Gold Dredging

1. Recreational Dredging Permits will be allowed on a case-by-case basis consistent with the guidelines contained in the SFAMP, overall vision for the parcel, and current BLM dredging stipulations.
2. Recreational dredging may be allowed in the public use zones along the river, but not in the Permittee Zone used by commercial operators.
3. Permits will be issued for a two-week period at a specific site. No more than two dredges at a time will be in operation on the Cronan Ranch.
4. Vehicle access for dredgers will be limited – one time in; one time out.

#### Visual Resource Management

1. Manage all lands in the Cronan Ranch parcel as VRM Class II. Changes to the characteristic landscape may be seen, but should not attract the attention of the casual observer.

## Camping

1. Organized group camping will require a Special Recreation Use Permit.
2. Camping for commercial outfitters will remain unchanged from present. Outfitters must notify BLM for overnight use. Commercial operators may use vehicular access to support camping activities.
3. General public camping will require Recreation Use Permits. Motorized vehicle access to campsites will not be allowed. Recreation use permits with camping fees will be collected at self-service kiosks within the camping zones.
4. BLM will designate camping zones. Specific campsites will not be designated, and may be selected by campers within camping zones. Camping along the river will be within 250 feet of the river to minimize impacts to uplands.
5. Campfire permits will be required. Campfires may be prohibited during high fire hazard times of the year; these restrictions will be posted. Campfires will only be allowed in BLM-provided fire-rings.
6. Locate seasonal campsites for use when fire danger is minimal.
7. Campsites will be accessible only by non-motorized transportation.

## Cultural Resources

1. Where practical, cultural sites will be interpreted for public use and enjoyment with an emphasis on interpreting sites associated with the Gold Rush of 1849, on the Cronan Ranch
2. Barbed wire may be removed, subject to review by a BLM archaeologist for potential historical value.

## Rights of Way

Requests for the granting of a right-of-way over Federal land for various purposes, including access roads, power lines, water lines, or telephone lines, will be considered on a case-by-case basis, and evaluated for conformity to management goals and objectives. Applications for a right-of-way must be made to the BLM.

This is the Federal equivalent of an easement under state law. Unlike easements, which are attached to a deed, rights-of-way are assigned to an individual for a specified time period, usually 30 years. There is an annual fee, based on the amount of land contained in the right-of-way. A right-of-way can be transferred to another person, should the holder sell their property.

A right-of-way will not be approved unless it is consistent with the Vision Statement, and the appropriate Visual Resources Management class.

## Trails

1. Year round trails will accommodate hikers, bicyclists, and equestrians. These trails

will be at least five feet wide where possible. The long-term goal of a trail system from Greenwood Creek to Salmon Falls will continue to be vigorously pursued. Trails linking private property to the Cronan Ranch will be considered for closure, maintenance or improvement on a case by case basis. The trails will be open all year; a trail monitoring plan will be developed to insure the integrity of the system is maintained. Temporary closures of certain trails may be necessary from time to time to prevent resource damage and overuse.

2. Trails will be designed using accepted Best Management Practices (BMP) and professional design.
3. Maintenance of existing trails is higher priority than designing and constructing new trails.
4. To prevent the spread of noxious weeds, bicyclists and equestrians will be asked to stay on the trails at all times.

#### Facilities

1. Develop non-potable water source at the trailhead with hose bib.
2. Develop or designate helicopter Landing Zone.
3. Provide picnic facilities adjacent to the parking lot and information kiosk.
4. Provide permanent restroom facilities at the parking lot, and on the beach.

#### Recreational Use of Firearms

1. Target shooting is prohibited on the Cronan Ranch.

#### Hunting

1. Hunting is restricted to deer and turkey in the fall season, deer during the summer archery-only season, quail, and mourning doves. There will be no hunting for bear, squirrels, rabbits, jackrabbits, waterfowl, furbearers, or non-game species. Information on hunting seasons will be posted on the information kiosk in the staging area of the parking lot.
2. Hunting weapons will be limited to the use of bow and arrows, smoothbore shotguns, and to muzzleloaders after fire season is declared over.



# United States Department of the Interior



## BUREAU OF LAND MANAGEMENT

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### **Cronan Ranch Management Plan (CA 180-06-26) Decision Record / Finding of No Significant Impact January 2007**

## **1.0 Introduction and Background**

The recently acquired Cronan Ranch parcel has become part of the *South Fork American River Management Plan* (SFARMP) area. As outlined in that plan, newly acquired parcels such as the Cronan Ranch would have site-specific management plans developed that would complement and fit under the larger umbrella of the SFARMP. Therefore, an extensive community based planning effort took place that resulted in the draft Cronan Ranch Management Plan. The draft plan was available for a formal 30-day public comment period. Based on information in the draft plan, the project record, recommendations from BLM specialists, consultation with California Department of Fish and Game and public comments, the following constitutes my decision on the various components of the draft Cronan Ranch Plan.

## **2.0 Decision and Rationale**

### **2.1 Alternatives Considered but not Selected**

Normally, a draft management plan prepared by a federal agency will include alternative actions, one of which will be identified as the proposed alternative. The Cronan Ranch Management Plan, however, is not solely a federal product; it was largely developed by citizens working in partnership with the BLM in a public forum. Because of this unconventional approach that considers many different options as the proposed alternative is being designed, the typical set of alternatives was not developed for this project.

#### No Action Alternative

Under this alternative, the Cronan Ranch would continue to be managed under the guidelines established for the closest parcel of BLM land along the South Fork American River, as specified in the *South Fork American River Management Plan*, and under conditions of purchase, as specified by the seller, the American River Conservancy. Present levels of management would continue, no new developments would be provided or allowed, and access would remain at current levels and condition. This alternative provides no site-specific guidance and does not take into consideration unique conditions, features, and public uses of the newly acquired lands. Therefore, it was not selected.

## Unmodified Community-Based Planning Alternative

This alternative consists only of items and issues discussed and agreed upon by the community-based planning group in a public forum, with no additions or modifications by BLM staff. The results of the community-based planning process, while impressive, were not complete. Several issues and other planning items were not addressed by the group because of time constraints. Also, several issues were discussed but no consensus was reached. Therefore, because it was incomplete, this alternative was not selected.

### **2.2 Decision**

I have considered all comments, oral and written, made in response to the draft Cronan Ranch Management Plan and Environmental Assessment, as well as comments received throughout the planning process. Based on this review and on consultation with my staff, I have decided to approve the draft Cronan Ranch plan with the following modifications:

- All hunting will be done with bow and arrows, muzzleloaders, or shotguns firing shot or slugs. Center-fire weapons with rifled barrels using any type of powder are prohibited.
- Muzzle loading (black powder) weapons may be used for hunting only after the BLM declares fire season over.
- Hunters will not be required to register at the parking lot kiosk. Instead, signs indicating that it is hunting season will be clearly posted at trailheads and parking lots.

The Cronan Ranch Management Plan has been modified to reflect these changes and provide greater clarification on some issues.

It is my decision to include the Cronan Ranch Management Plan as a chapter in the South Fork American River Management Plan, adopted in July, 2004.

### **2.3 Rationale**

Comments on the draft plan fell generally into two categories: hunting and vehicle access. The following rationale summarizes the reasoning behind my decisions regarding hunting and vehicle access in the Cronan Ranch. More detailed responses to public comments on these topics and more can be found in the attached document, *Cronan Ranch Management Plan - BLM Responses to Public Comments*.

#### Hunting

Because of a trail system that was largely in place when BLM acquired the property, the Cronan Ranch is a popular destination for equestrians, mountain bikers, and hikers. The use of firearms with a long range, such as rifles, at any time of the year as well as firearm use of any type during the busiest times of the year in this popular recreation area is unsafe. Furthermore, during community based planning, many non-hunters stated that they experience anxiety when hunters

are nearby. Given the proximity of nearby BLM lands such as the Norton Ravine parcel where firearm use is permitted and appropriate, adverse impacts to hunters is not expected.

Firearms for hunting will be limited to muzzleloaders or shotguns only, using shot for birds and slugs for deer. This is because projectiles fired from a shotgun don't travel as far or as fast as bullets from a center fire weapon with a rifled barrel, thus reducing the probability of an accident.

Projectiles from muzzle loading weapons also have lower velocity, but there is an inherent fire danger posed by the use of black powder, and possibly other, similar propellants. This danger is decreased rapidly by the arrival of rain in the fall. Therefore, muzzle loading weapons will be permitted for hunting after the end of the fire season.

Archery hunting with bow and arrows will also be allowed during the late summer and fall archery season.

### Vehicle Access

Because of all the grantors' focus on habitat protection, California's focus on low impact recreation and ARC's focus on trail use (as opposed to river use), BLM decided it would not be appropriate to allow unlimited vehicle access through Cronan Ranch. Outfitters are allowed very limited access in order to reduce the need for lunch/camp boats (thus reducing boat congestion on the river). BLM believes that limited access will not jeopardize the habitat values for which the property was acquired. On the other hand, unlimited vehicle access would likely increase noxious weeds, erosion, and wildlife disturbance as well as degrade the recreational experience for hikers and equestrians. Therefore, private boaters will not be allowed vehicular access to the river.

Most of the guidance contained in the Cronan Ranch plan came directly from public consensus after public debate in a series of public meetings. It is my decision to respect the time and effort of interested citizens by approving the results of their work.

## **2.4 Conclusion**

The Cronan Ranch will be managed for multiple use and sustained yield as required by law, and in conformance with the South Fork American River Management Plan and the Sierra Planning Area Management Framework Plan as amended. Under the Federal Land Policy and Management Act, there is a wide range, or continuum, of possible management actions which can be chosen to achieve the twin objectives of Multiple Use and Sustained Yield. In this case, the interested community in the Cronan Ranch area was given the opportunity of determining the point along that management continuum which best suits their community. By doing this, the BLM has recognized the role of local customs, culture and economics in Public Land Management.

Implementation of the Cronan Ranch Management Plan will result in the continuation of a valuable and important experiment in community-based planning. It is important to clarify the context in which this plan is being decided.

Stewardship of the public lands is always a public matter. This plan is an attempt to give the public a greater voice in helping determine the future of their lands. In this case, the scales of decision-making were tipped in favor of the customs and culture of the local community, and those who have a personal interest in the Cronan Ranch, within the constraints of law and policy. This experiment is timely and worthwhile. Its success or failure will be determined in the years ahead.

With the addition of the 1,400-acre Cronan Ranch, the South Fork American River Management Plan area covers approximately 5,560 acres in eight planning units along the 21-mile stretch of the South Fork between Chile Bar and Salmon Falls Bridge. This pattern of public land ownership and management will provide the citizens of the United States with a superb opportunity for outdoor recreation in a historic setting for many years to come.

### **3.0 BLM Strategic Plan**

This project will promote a number of goals in BLM's Strategic Plan for 2004-2008:

*Resource Protection: Improve, Restore, and Maintain the Health of Watershed and Landscapes.* The project will prevent or reduce erosion (EA p. 14), treat noxious weeds (EA p. 12) and maintain or expand oak woodlands (EA p. 13).

*Resource Use: Protect Cultural and Natural Heritage Resources.* The project will protect and interpret gold rush era historic sites (EA p. 14).

*Recreation: Enhance the Quality of Recreational Opportunities and Improve Access.* The project will provide hiking and equestrian trails as well as river access by boats to the Cronan Ranch. Toilet facilities will also be improved.

### **4.0 Consultation and Coordination**

The only known federally listed species known to occur in the Cronan Ranch area in the threatened bald eagle. Implementation of the Cronan Ranch plan would have no effect on the bald eagle; therefore, consultation with the US Fish and Wildlife Service was not necessary. As projects are proposed and analyzed at the site specific scale in the Cronan Ranch parcel, consultation will be initiated as necessary.

### **5.0 Public Involvement**

Public involvement has been an integral part of this project in the form of community based planning, which occurred in the form of many meetings at various locations over a number of months. More than 200 individuals took part in these meetings, many attending more than one planning session. During community based planning, the Cronan Ranch management plan took form and included, to the extent possible given the confines of law and BLM regulations, the

wishes of the public. Further public involvement included scoping for this project which began in August 2005 and the 30-day formal public comment period which occurred in August and September 2006 and resulted in 24 letters of comment. The two major concerns expressed in the comment letters were hunting and vehicle access to the river. Detailed responses to all the substantive comments received are included in the attached document, *Cronan Ranch Management Plan -BLM Responses to Public Comments*.

## **6.0 Finding of No Significant Impact (FONSI)**

### **6.1 Plan Consistency**

Based on information in the draft plan and EA, the project record, recommendations from BLM specialists, consultation with California Department of Fish and Game and public comments, I conclude that the decisions in this Decision Record are consistent with the 1983 Sierra MFP (as amended). This decision is also consistent with the Endangered Species Act; the Native American Religious Freedom Act; other cultural resource management laws and regulations; Executive Order 12898 regarding Environmental Justice; and Executive Order 13212 regarding potential adverse impacts to energy development, production, supply and/or distribution.

### **6.2 Finding of No Significant Impact**

On the basis of the EA, community based planning, and public comments regarding the Cronan Ranch Management Plan, it is my determination that the decision stated above will not result in significant impacts to the quality of the human environment. Anticipated impacts are within the range of impacts addressed by the Sierra MFP. Thus, the Cronan Ranch Management Plan does not constitute a major federal action having a significant effect on the human environment; therefore, an environmental impact statement (EIS) is not necessary and will not be prepared. This conclusion is based on my consideration of CEQ's following criteria for significance (40 CFR §1508.27), regarding the context and intensity of the impacts described in the EA and based on my understanding of the project:

*1) Impacts can be both beneficial and adverse and a significant effect may exist regardless of the perceived balance of effects.* No significant adverse impacts (site specific or cumulative) have been identified.

*2) The degree of the impact on public health or safety.* No aspects of the project have been identified as having the potential to significantly and adversely impact public health or safety. In fact, public safety has been emphasized as evidenced by the discussion surrounding firearm use and the safety-prompted decision to prohibit center-fire rifles and handguns for hunting.

*3) Unique characteristics of the geographic area.* None have been identified.

*4) The degree to which the effects on the quality of the human environment are likely to be highly controversial effects.* No anticipated effects have been identified that are scientifically controversial. As a factor for determining within the meaning of 40 C.F.R. § 1508.27(b)(4)

whether or not to prepare a detailed environmental impact statement, “controversy” is not equated with “the existence of opposition to a use.” *Northwest Environmental Defense Center v. Bonneville Power Administration*, 117 F.3d 1520, 1536 (9th Cir. 1997). “The term ‘highly controversial’ refers to instances in which ‘a substantial dispute exists as to the size, nature, or effect of the major federal action rather than the mere existence of opposition to a use.’” *Hells Canyon Preservation Council v. Jacoby*, 9 F.Supp.2d 1216, 1242 (D. Or. 1998).

5) *The degree to which the possible effects on the human environment are likely to be highly uncertain or involve unique or unknown risks.* The analysis does not show that this action would involve any unique or unknown risks.

6) *The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.* The Cronan Ranch management plan is not precedent setting. This is one of several management plans produced by the Folsom Field Office that is designed to provide for a multitude of uses, mostly recreational, of a parcel of land and complies with the Sierra MFP.

7) *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.* No significant cumulative impacts have been identified (EA p. 30). The project is consistent with the actions and impacts anticipated in the Sierra MFP, as amended.

8) *The degree to which the action may adversely affect National Historic Register listed or eligible to be listed sites or may cause loss or destruction of significant scientific, cultural or historical resources.* The project area does not include any sites listed on the National Register of Historic Places or sites known to be eligible. Some historic Gold Rush era sites may meet National Register of Historic places criteria (EA p. 7). Those sites’ potential eligibility will not be compromised by the project.

9) *The degree to which the action may adversely affect ESA listed species or critical habitat.* The bald eagle is the only known federally threatened or endangered species to occur in the area; ESA critical habitat does not occur in the area. The project is not anticipated to adversely impact the bald eagle (EA p. 12); therefore, informal or formal consultation with the Fish and Wildlife Service is not necessary.

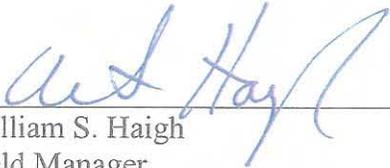
10) *Whether the action threatens a violation of environmental protection law or requirements.* There is no indication that this decision will result in actions that will threaten such a violation.

## **7.0 Administrative Remedies**

Administrative remedies may be available to those who believe they will be adversely affected by this decision. Appeals may be made to the Office of Hearings and Appeals, Office of the Secretary, Department of Interior, Board of Land Appeals (Board) in accordance with the regulations in 43 CFR Part 4. Notice of appeals must be filed in this office within 30 days after publication of this decision. If a notice of appeal does not include a statement of reasons, such statement must be filed with this office and the Board within 30 days after the notice of appeal is

filed. The notice of appeal and any statement of reasons, written arguments, or briefs must also be served upon the Regional Solicitor, Pacific Southwest Region, 2800 Cottage Way, Room E-1712, Sacramento, CA 95825.

The effective date of this decision (and the date initiating the appeal period) will be the date of publication of the notice of decision in the Placerville *Mountain Democrat*.



William S. Haigh  
Field Manager,  
Folsom Field Office

1-8-07

Date

## Cronan Ranch Management Plan BLM Responses to Public Comments

### HUNTING

**The property should be open to all legal hunting activities.**

It is BLM policy to allow all legal hunting activities on lands under its jurisdiction unless otherwise posted. Public land areas where hunting is restricted or even prohibited are usually areas with high recreation use, which heightens safety concerns, or special biological values that could be harmed by hunting.

Hunting during high use portions of the year (winter, spring and early summer) would potentially conflict with other uses such as hiking or horseback riding. Safety could be an issue due to 1) shooting in close proximity to other recreationists and 2) shooting noise which could cause horses to bolt. Hunting is not restricted on the nearby Norton Ravine parcel, thereby providing an alternative for those wishing to hunt in the spring or late summer. Shotgun hunting will be allowed fall through mid winter (January) for deer, quail and doves. Rifle and handgun hunting will not be permitted because of the public safety hazard presented by these longer-range weapons.

**Please allow spring turkey hunting.**

Spring turkey hunting would occur during a high use season for hikers and equestrians. Therefore, it will not be permitted due to potential safety concerns. However, spring turkey hunting is available on the nearby Norton Ravine parcel and thus, hunters should not be adversely affected by this decision because there are reasonable alternatives available.

**Dates for turkey hunting change every year and should be listed more generally in the plan.**

The dates given in the plan were for analysis purposes. Actual hunting season dates do vary by year and are determined by the California Department of Fish and Game.

**Is there evidence that spring turkey hunting conflicts with other uses or prevents others from enjoying wildflowers? Most turkey hunters will not hunt near trails with frequent human use.**

During community based planning, non-hunters expressed discomfort and anxiety with the idea of visiting an area where hunting was occurring nearby. Furthermore, BLM does not believe it prudent to allow hunting in areas with high non-hunting recreation use. As stated above, spring turkey hunters are welcome on the nearby Norton Ravine parcel, so adverse impacts to hunters are not anticipated.

**Most turkey hunting occurs in the spring. Therefore, impacts to hunters and the economy are greater by prohibiting spring rather than fall turkey hunting.**

Because spring turkey hunters can use the nearby Norton Ravine parcel, there should be no noticeable economic impact. Even if nearby options were not available, it is unlikely that the economic impact of restricting the Cronan Ranch parcel from spring turkey hunting would be noticeable.

**Please allow bow hunting for deer.**

Bow hunting will be permitted.

**Concern for hunter privacy and risk of harassment if hunters are required to register at a kiosk.**

BLM agrees that it would be unfair to require hunters to register without requiring the same of other recreationists. Therefore, that part of the plan has been modified. Instead of requiring hunter registration, BLM will clearly notify all visitors (using signs) when hunting season is in effect.

**Analysis of hunting safety is anecdotal but should address statistics.**

Safety as well as the wishes of various user groups were considered when determining how to allocate the various uses of the Cronan Ranch parcel. Consensus was not reached during community based planning on the issue of hunting. Therefore, BLM believes a compromise that allows bow and shotgun hunting during the lower-use portion of the year (fall and winter) is the best way to provide for competing uses on the Cronan Ranch parcel. Even though data indicate that hunting related accidents are rare (EA p. 26), BLM appropriately determined that 1) hunting during the high use season may conflict with other uses, as identified by portions of the public during community based planning, and 2) hunting would not be adversely affected because hunting could still occur in the fall and winter. Furthermore, the nearby Norton Ravine parcel provide spring hunting opportunities.

**If shotguns are safer than rifles, why not allow hunting of waterfowl and spring turkey?**

Shotgun noise could cause horses to bolt, which is a safety concern. But as discussed above, user preferences were also considered and BLM believes that allowing hunting during lower use portions of the year is the best compromise between competing uses. Also, many other people perceive a potential threat that inhibits their full enjoyment of a recreational experience.

**Why not allow waterfowl hunting when other hunting would be occurring at the same time?**

Waterfowl such as Canadian geese, mergansers, and occasional mallards can sometimes be seen on the river. On the Cronan Ranch, the north side of the river is federal land, but the south side is private. Hunters on the federal land aiming at flying waterfowl (as required by state law) would have difficulty not shooting into private property. Waterfowl hunting could occur on the Miners Cabin or Greenwood Creek parcels where lands on both sides of the river are in federal ownership.

**Protection of wildlife was not analyzed.**

Because no site specific, ground disturbing activities are proposed under this plan, impacts on wildlife were not anticipated or discussed. The EA (p. 12) points out that “Management actions which could have an impact on any of these species will be subject to further environmental review.”

**The analysis should address nearby areas where hunting is allowed or prohibited in the overall impact of limiting hunting on Cronan Ranch.**

As stated in the South Fork American River Management Plan (SFARMP p. 11) hunting is allowed in other portions of the South Fork planning area. It is not allowed in the Ponderosa, Parcel C and Dave Moore Nature Area parcels.

**Muzzleloaders should be allowed when fire danger is low.**

We agree. Muzzleloaders have the inherent potential to start fires. The Cronan Ranch is vulnerable to fire because of large areas of light fuels, such as dry grass. After fall rains begin and BLM declares fire season over, muzzleloader use for hunting deer, quail or dove would be permitted.

**If hunting is controversial, an EIS should be prepared (p. 26).**

The Ninth Circuit Court found that the type of controversy that could trigger an EIS is highly controversial, scientific disagreement (*Native Ecosystems Council v. U.S. Forest Service* 2005). Disagreement by members of the public who do not like aspects of a proposal does not constitute the type of controversy that would necessitate an EIS.

**Will depredation permits be allowed (p. 25)?**

Since wildlife management is one of the multiple uses recognized by the Federal Land Policy and Management Act, it is very unlikely that BLM would apply for a depredation permit. Should a neighbor obtain a depredation permit from DFG, they would need to obtain permission from the Folsom Field Office to search for the problem animal on the Cronan Ranch, since predator hunting is not normally allowed.

**Why not restrict hunting around crowded recreation areas? (p. 29).**

That is exactly what we are proposing to do at the Cronan Ranch. Please note that there are no such restrictions on many other BLM-administered parcels, including the Miners Cabin and Norton Ravine Parcels.

## **TARGET SHOOTING**

**Explain how target shooting is incompatible with plant/wildlife habitat (p. 23).**

Habitat could be harmed through the concentration of human activity in one location. The target shooting site would lose native vegetation due to trampling, only to have it replaced by noxious weeds that prefer disturbed soils. Lead bullets or shot in the impact area is considered a toxic material by some agencies. Fire is also a concern.

**Does target shooting include air guns and archery? How is it different from hunting? Why not allow target shooting? (p. 4, 25, 29)**

Target shooting includes all forms of shooting that are not associated with actual hunting. For the purposes of the Cronan Ranch analysis, target shooting differs from hunting in the amount of potential trash left behind (bits and pieces of paper targets, concentrations of lead or shell casings, etc.) and potential for vandalism such as when signs are used as targets.

The South Fork American River Management Plan (p. 11) prohibits target shooting on all federal lands in the SFARMP area, which now includes the Cronan Ranch parcel. BLM decided to not allow target shooting, even under a SRUP, largely because of historical evidence of abuse of public lands as a result of copious amounts of trash left behind and inappropriate items being used as targets (signs, gates, car batteries, old televisions, etc.) in other areas managed by Folsom Field Office. In addition, portions of the public involved in the Cronan Ranch community based planning effort expressed concern over recreating in the same area where shooting is occurring. BLM shares their view that target shooting is not a compatible use in a high use recreation area due to proximity to people on trails and the river.

## RECREATION

**A public take-out at Cronan Ranch would stretch that Class II run to about 8.5 miles and would make a perfect day float for rafting families and beginning kayakers.**

Providing general vehicle access, including access by groups holding SRUPs, to the river through Cronan Ranch would not meet the terms and conditions of the acquisition as outlined by the three grantors:

*Wildlife Conservation Board:*

“...acquisition will be for the purposes of plant and wildlife habitat preservation, restoration and management, wildlife-oriented education and research, and for compatible public uses, all as may be consistent with wildlife habitat preservation.”

*State of California, Proposition 40:*

“BLM shall maintain, operate and use the property...for riparian and riverine habitat, for river and downstream trail projects, to provide public access to the river, and to allow open space areas along the river for low-impact recreational uses...”

*American River Conservancy:*

...to ensure the permanent protection of the Property’s natural resources and more specifically, to (a) ensure that no new structure, road or other human ‘improvements’ will be placed on the Property, or in rare exceptions, where appropriate, only to the extent minimally necessary to open and maintain the property for public trails use, and in all cases consistent with the overriding purposes of preserving the property’s natural resources; (b) provide for the elimination of any mining, logging (except in rare cases where needed for restoration purposes), and grazing (except in rare cases where needed for fire or resource management on or under the Property; and (c) provide for the permanent protection of water and key natural resources on or under the Property...

Because of all the grantors’ focus on habitat protection, California’s focus on low impact recreation and ARC’s focus on trail use (as opposed to river use), BLM decided it would not be appropriate to allow unlimited motorized vehicle access through Cronan Ranch. Outfitters are allowed very limited access in order to reduce the need for lunch/camp boats (thus reducing boat congestion on the river). BLM believes that limited access will not jeopardize the habitat values for which the property was acquired. On the other hand,

unlimited motorized vehicle access would likely increase the spread of noxious weeds, erosion, and wildlife disturbance as well as degrade the recreational experience for hikers and equestrians.

A private-boat take-out has already been designated one-and-a-half miles upstream at the Greenwood Creek parcel to meet this need.

**Will private boaters be restricted from the permittee zone, and vice versa? If so, the private boaters will have fewer, lower quality lunch/camping sites than the outfitters.**

Private boaters may use the permittee zone when it is unoccupied by outfitters. This is typically before noon and after 3:00 p.m. on a daily basis. Outfitters are restricted to the permittee zone in order to concentrate their use and reduce the impacts of heavy use over a larger area.

**Vehicle access to deliver lunch is not necessary and can be done as easily from a boat.**

The BLM agrees, and has limited this activity between July and September. However, allowing outfitters limited use of motorized vehicles for lunch and camp support between July and September helps reduce the number of boats (gear boats) on the river during the heaviest use of the season, which benefits all river recreationists.

**BLM pit toilets should be evenly distributed along the river and open to all users.**

BLM pit toilets will be located in strategic locations in the permittee and private zones and will be available to everyone.

**Allowing the outfitters to keep picnic tables and shade structures detracts from the naturalness of the site. Please plant trees to provide alternate shade.**

Due to seasonal high flow events, it would not be practical to plant trees on the beach. In addition to establishing a permittee zone which concentrates outfitter use in one area, tables and shade structures further concentrate use, thus reducing impacts on other areas of the riparian zone. The BLM will allow for shade structures for food preparation, and picnic tables will be allowed in the interim, but will be phased out within five years. All structures will be removed by September first of each year.

**Camping should not require a special recreation use permit (p. 3, 17, 18).**

Special recreation use permits for camping would only be required of organized groups (43 CFR 2932). Camping by the general public would require a recreation use permit, not a special recreation use permit. This was not stated correctly in the draft Cronan Ranch management plan (p. 20) and will be corrected in the final version. Special use permits will be available in each camping zone.

**How many outfitters have permits to use Cronan Ranch (p. 11)?**

In 2006, 13 outfitters had permits to use Cronan Ranch.

**How was the number of visitors last year calculated, and what areas did they use? (p. 11)**

Use numbers are determined by on-site monitoring and outfitter use reports. The most heavily used area was the “commercial beach area”, but the parking lot and all trails received significant use in 2006.

**Parking area visual impacts have not been mitigated. Confirm if consensus was reached on VRM category. Define VRM 2 (p. 14).**

The visual impacts of the parking lot existed prior to BLM's acquisition of this property. Therefore, they would not constitute an impact resulting from implementation of the management plan and do not need to be mitigated as part of the management plan.

Consensus on the VRM class was reached at the November 1, 2005 public meeting. VRM 2 lands are managed for low levels of change to the characteristic landscape. Management activities may be seen but should not attract the attention of the casual observer. Changes should repeat the basic elements of form, line, color, texture, and scale found in the predominant natural features of the characteristic landscape.

**Horses and bikes should be allowed off trail because they are not more likely to spread weeds than hikers (p 21).**

BLM cannot consider this request because the commenter did not provide any evidence to support the conclusion that hikers, equestrians and cyclists are equally likely to spread weeds.

**Restroom impacts should be mitigated (p. 22).**

No new impacts are anticipated as a result of developing permanent toilet facilities. The new facilities are expected to have the same level of impact as the current portable toilets (EA p. 24). Therefore, no new impacts requiring mitigation are anticipated. The BLM currently has 22 toilets that need weekly pumping. By having only six toilets and pumping one or two times a year, there is less impact from vehicles coming in and out, and user experience is less effected. The cost of pumping varies.

**SRUPs should not be used for campfire authorization (p. 19, 20).**

That is correct. The wording in the draft management plan is incorrect and will be clarified in the final version to state that standard, interagency campfire permits will be required; special recreation use permits will not be required for campfire use.

**Disagreement with definition of heavy use season (p. 17).**

Use numbers for the South Fork American show that the heaviest use occurs from July 1 to Labor Day weekend. However, BLM chose to limit outfitters' vehicle use of Cronan Ranch to July 1 through August 30 (Cronan Ranch EA p. 16).

**How did BLM determine that trail use will increase, causing hunter/hiker conflict (p. 26)?**

Trail use is expected to increase for four reasons: 1) trail and parking lot/staging area development linking the Cronan Ranch parcel with the Greenwood Creek parcel will increase hiking opportunities; 2) the transfer of the parcel from private to public ownership is likely to increase use; 3) the Cronan Ranch will receive appropriate and routine publicity as a public outdoor recreation opportunity, just as other recreation areas have been publicized in brochures, on the website, or on maps; and 4) the continued rapid population growth in western El Dorado County.

**Interpretation and environmental education should be included in the proposed action (p. 1).**

Interpretation of cultural sites is anticipated, as outlined in the EA (p. 21). Furthermore, environmental education is specifically identified in the vision statement for the Cronan Ranch (EA p. 9): “Reasonable public access to the river and the land will accommodate a wide range of uses including but not limited to recreational and education experiences that are consistent with resource protection.”

**Effects of horse trailer parking weren’t covered in the SFARMP (p. 1).**

Horse trailers weren’t specifically addressed in the analysis of effects because no impact was anticipated with their use in parking lots.

**Impacts of increased recreation and horse manure should be addressed (p. 9, 13).**

Within the South Fork American River Management Area (which includes the Cronan Ranch parcel), BLM is committed to using adaptive management to resolve problems. Should increased recreation or horse manure become a problem, the BLM will first attempt the least restrictive solution. If that doesn’t work, increasingly restrictive prescriptions will be implemented until the problem is resolved.

**NEPA**

**Land acquisition and facilities development (trails, parking, roads) should be covered by NEPA.**

NEPA analysis is not required for BLM land acquisition. It is required before BLM can perform any actions that could impact resources such as water, soil, vegetation or animals. Therefore, although NEPA analysis was neither required nor conducted for acquisition of the parcel, it was conducted for trail construction between the Greenwood Creek and Cronan Ranch parcels (EA# CA-180-05-12). NEPA analysis was not conducted for other trail work and parking area development that was implemented prior to BLM’s acquisition of the Cronan Ranch parcel.

**The SFARMP should be re-done as an EIS to comply with NEPA.**

An environmental assessment (EA) “provides sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact” (40 CFR 1508.9(1)).” Therefore, an EIS is prepared when significant potential adverse impacts are expected not merely because the analysis will cover a broad scale plan or because a member of the public requests that an EIS is prepared. It is appropriate under the National Environmental Policy Act (NEPA) to prepare an EA, such as that prepared for the SFARMP, in order to determine if there are potentially significant, adverse effects that would indicate the need to prepare an EIS. No significant adverse effects were identified during the SFARMP EA; therefore, the EA level of analysis is appropriate.

**Please extend the comment period for thirty days because the draft plan/EA were not published in the federal register.**

The National Environmental Policy Act (NEPA) does not require that notices be placed in the Federal Register announcing the availability of environmental assessments (EA). It *does* require

that agencies “make diligent efforts to involve the public in preparing and implementing their NEPA procedures” (40 CFR 1506.6(a)) which BLM did very thoroughly when it conducted ten community based planning meetings for the Cronan Ranch plan. Following completion of the draft management plan and EA, BLM sent copies of the document to those who requested to be on the mailing list. Furthermore, BLM issued a press release announcing the availability of the draft plan and EA in August 2006. However, the Mountain Democrat chose not to publish the press release.

**Construction and use of parking areas and trails could cause dust and must comply with the Clean Water and Clean Air Acts. An El Dorado County permit must be obtained for construction or mitigated to insignificance.**

All construction projects on federal land require NEPA review. The BLM, as a federal agency, is not required to obtain county permits.

**Cronan Ranch can’t be covered in the interim under the South Fork American River Management Plan (SFARMP) because it was not anticipated in the SFARMP (p. 1).**

Acquisition of additional lands along the South Fork American River corridor was anticipated by the SFARMP; see page 7 of that plan, assumption #4. On page 10 the SFARMP states that “newly acquired lands within the general South Fork Planning Area will become part of the South Fork American River Special Management Area, and subject to management guidelines and planning decisions associated with the nearest, or most similar, Special Management Area parcel...” Therefore, even though acquisition of the Cronan Ranch parcel was not addressed in the SFARMP, management of the parcel, which is geographically located within the SFARMP area, *is* covered under SFARMP guidelines.

**All reasonable alternatives should be considered (p. 10).**

As stated in the Cronan Ranch EA (p. 4), it would not be reasonable to consider in detail the unmodified community based plan alternative because it is too similar to the proposed action for there to be notable differences in anticipated effects. As for other alternatives, you have not identified a reasonable alternative that BLM should have considered.

Part of the Cronan Ranch plan purpose and need was to develop a plan through the community based planning process, of which the proposed action was the result (EA p. 2). The range of alternatives is appropriately limited to those that would fulfill the purpose and need. Therefore, it is not necessary to consider alternatives that were not generated through the community based planning process.

**Clarify “ultimately incorporate this plan into the SFARMP” (p. 2).**

The SFARMP provides overarching guidance for a 21-mile stretch of lands in the South Fork American river corridor. The SFARMP stated that more site specific guidance would be provided for individual parcels and that later acquired parcels would be managed in accordance with a neighboring parcel’s guidance until a site-specific management plan (that would conform to the overarching SFARMP guidance) for the new parcel could be developed (see above). Therefore, to clarify the term “ultimately incorporate”, development of the Cronan Ranch plan, in conformance with guidance in the SFARMP, constitutes incorporation into the SFARMP.

The Cronan Ranch plan's Purpose and Intent (pp. 1, 10) did not commit to a revision of the SFARMP. The SFARMP stated that the plan would apply to Federal lands in the SFARMP area, of which the Cronan Ranch parcel is one, and that land acquisition was anticipated. Therefore, there is no need to revise the SFARMP.

The Cronan Ranch EA does not, in either stated intent or reality, tier off the SFARMP EA. The Cronan Ranch EA complies with the Sierra Management Framework Plan and the two area plans, SFARMP and Cronan Ranch, are complementary.

**Grazing removal should have been analyzed in a NEPA document. BLM stated that grazing would remain an option (p. 14).**

Because grazing ended with the purchase of the parcel by American River Conservancy, the lack of grazing constituted the current condition when BLM acquired the parcel (EA p. 7).

Furthermore, a condition of the transfer of the parcel by ARC to BLM was that grazing would only be used for fuel hazard reduction and weed control, if at all. Therefore, whether or not to allow grazing is not a decision that is before the field manager and was not analyzed in the EA.

## **FIRE/FUELS**

**Fuel breaks should be constructed and fuels reduced (p. 3).**

According to the South Fork American River Management Plan (p. 12) BLM will prepare a fuels management plan for each planning unit including the Cronan Ranch.

**Fire hazard impacts of encouraging oak woodland expansion should be addressed (p. 3, 16).**

Existing and anticipated changes in fuel hazard will be addressed at the site-specific level during planning for fuel hazard reduction projects.

## **ROADS**

**Roads should be graveled near the river to prevent sediment from dusty roads (p. 12).**

The objective is to gravel the road accessing the river. This action will be analyzed in more detail at a future date.

**Serpentine road work must have a special permit and the asbestos risk (air and water) requires erosion control other than planting (p. 12, 31).**

According to the 1974 Soil Survey of the El Dorado Area, serpentine soils are not expected in the area. However, if serpentine soils are encountered during future, site-specific planning for road maintenance, appropriate measures will be taken in order to reduce or prevent adverse impacts associated with asbestos.

**Roads should be maintained for all weather conditions (p. 17).**

Road location, surfacing material and season of use are/will be used to prevent road degradation and associated erosion and sediment. For example, the road located in a seasonally wet, boggy

area has been blocked. The primary road through the parcel is higher on the slope and is not as susceptible to wet season damage. Furthermore, as stated above, future planning specifically for roads in the area will include road surfacing and season of use to prevent rutting, erosion and subsequent sedimentation.

## **OTHER**

### **Withdrawal of the area from mining would cause significant impacts (p. 30).**

Neither you nor the EA identified any potentially significant impacts associated with withdrawal of the area from mining. Commercially significant mineral values are not known to exist on the Cronan Ranch. The area has been heavily and systematically prospected since the earliest days of the Gold Rush, and other than placer gold in the river itself, nothing has been found.

### **Erosion and sediment should be addressed. Culverts are contributing to erosion (p. 4, 12, 13). Trail clearing debris was placed in streams, causing erosion (p. 3).**

As site specific activity level plans are developed for sites within the Cronan Ranch parcel, impacts of proposed activities on erosion and opportunities to address existing erosion will be addressed.

### **Cronan Ranch legal description, map and acres are inaccurate (p. 7, 14).**

The Cronan Ranch, as acquired from the American River Conservancy, is located within sections 9 and 16, Township 11 North, Range 9 East, Mount Diablo Baseline and Meridian. All the Cronan Ranch property is located north of the river.

### **Affected environment description is wrong. Only a small fraction of the watershed is managed by the El Dorado NF. The term “planning area” is undefined, and all areas are less than 2,000’ elevation (p. 10)**

The information contained in the EA under “Affected Environment” is accurate. The term “planning area” was not defined since we assumed that since the EA was written for the Cronan Ranch Management Plan, the reader would associate “planning area” with the Cronan Ranch.

### **Has the title been recorded? (p. 8).**

The title was recorded with El Dorado County on May 20, 2005.

### **Adjacent, SRARMP parcels have different management policies, so how could Cronan be managed the same as those in the interim? (p. 9)**

Page one of the Cronan Ranch plan specifies that until the Cronan Ranch plan is complete, the parcel will be managed the same as the nearby Greenwood Creek parcel. Therefore, there is no need to balance management between the Greenwood Creek and Norton Ravine parcels.

### **The SFARMP area is not defined (p. 9)**

The SFARMP planning area need not be defined in the Cronan Ranch plan because it was defined earlier in the SFARMP (p. 3) as being the 21-mile stretch of Federal lands along the South Fork American River between Chili Bar and Salmon Falls Bridge.

**Discussions regarding water diversions are inaccurate (p. 13).**

Information on water diversions was obtained from El Dorado County. We believe it accurate.

**What are the weed control options (p. 15)?**

Weeds are addressed in the EA, p. 13. Control options include cutting or pulling weeds using mechanical or manual methods. Prescribed fire, grazing and bio-controls may also be used. Weed spread prevention includes using weed-free seed and straw in planting and erosion control as well as cleaning vehicles.

**Historic ditches and other mining features should be protected. Trails should not be built along historic ditches (p. 20, 21).**

As identified in the EA (p. 22), “BLM is required by law to protect cultural resources found on public lands. Impacts to cultural resources will be evaluated and, if necessary, mitigated during site-specific project planning for ground disturbing activities.