Appendix C

Results of Scoping

Appendix C

Results of Scoping
South Coast Resource Management Plan Revision

I. Introduction

A. Background

In 1994, the BLM completed the *South Coast Resource Management Plan* (SCRMP) which provided guidance for managing public lands in the South Coast Resource Area of southern California. This planning area encompassed 296 parcels of public land totaling 129,000 acres and an additional 167,000 acres of non-federal surface with federal mineral estate scattered throughout Los Angeles, Orange, southwestern San Bernardino, western Riverside, and western San Diego Counties. To facilitate planning and subsequent management, the South Coast Planning Area was divided into four management areas: 1) the San Diego County Management Area, 2) the Riverside-San Bernardino County Management Area, 3) the Beauty Mountain Management Area, and 4) the Los Angeles-Orange County Management Area. The boundaries of the South Coast Resource Area have not changed since 1994 and the planning area will remain the same for this proposed plan revision. The BLM has acquired over 6,000 acres within the planning area since 1994 that are not addressed in the current plan.

The SCRMP addressed five major issues: 1) land tenure adjustment and use authorizations, 2) special status species (threatened, endangered, and sensitive), 3) open space, 4) recreation and public access, and 5) oil and gas leasing and sand and gravel development. The following is a synopsis of how each of these issues was addressed in the SCRMP.

Land tenure adjustment and use authorizations. The SCRMP identified public lands for retention and lands available for disposal from Federal management. When fully implemented, the pattern of BLM public land ownership would potentially change from 296 scattered parcels to 15 manageable blocks of public land, but with little change to the total acres of public land. In general, the public lands remained open to multiple use, except for areas requiring special management attention to protect sensitive resources.

Special status species. The SCRMP established six Areas of Critical Environmental Concern (ACECs) for the protection of listed and sensitive species, which included management prescriptions such as right-of-way avoidance areas and other restrictions to ensure adequate protection of these species. The BLM consulted formally with the U.S. Fish and Wildlife Service (USFWS) on the entire SCRMP, resulting in two Biological Opinions: 1) B.O. number 1-6-92-F-45 dated August 31, 1992, addressing impacts to the Stephens'

kangaroo rat, and 2) B.O. number 1-6-92-F-45R dated November 22, 1993, addressing impacts to the coastal California gnatcatcher. During the course of formal consultation, the USFWS and BLM developed means and measures to avoid impacts to five other listed species: the California condor, slender-horned spineflower, least Bell's vireo, unarmored three-spine stickleback, and the Santa Ana River woolly-star.

Open space. This issue is of paramount concern to the residents of the South Coast area due to rapid urbanization and development. Open space, or undeveloped natural landscapes, provides scenic viewsheds, physical and psychological release from more densely developed areas, and watersheds to recharge local water supplies. Open space also provides important habitat and corridors for the movement of wildlife. Local jurisdictions are interested in utilizing the public lands to help meet their open space needs. The SCRMP facilitates collaborative planning with the local jurisdictions and gives priority to local jurisdictions for public land disposal in specially identified areas.

Recreation and public access. This was an important issue identified by local governments and residents during the SCRMP scoping process. Local jurisdictions are looking to capitalize on the public lands surrounding their communities to provide recreational use opportunities and to provide legal access to these areas. The SCRMP established three Special Recreation Management Areas with emphasis on providing for public safety, legal access, developed recreation sites, and trail systems, while protecting the area's natural resource values.

Oil and gas leasing and sand and gravel development. This was raised as an issue due to the national importance of oil and gas, and the regional importance of sand and gravel. Certain public lands within the Los Angeles-Orange County Management Area and Riverside-San Bernardino County Management Area are known to contain these resources. The SCRMP made these parcels available for resource extraction.

B. Need for the SCRMP Revision

Bureau guidance (43 CFR 1610.5-5) suggests amending or revising an RMP under several circumstances including the need to:

a) Consider a proposal or action that does not conform to the plan;

b) Implement new or revised policy that changes land use plan decisions, such as an approved conservation agreement between the BLM and the USFWS;

c) Respond to new, intensified, or changed uses on public land; and

d) Consider significant new information from resource assessments, monitoring, or scientific studies that change land use decisions.

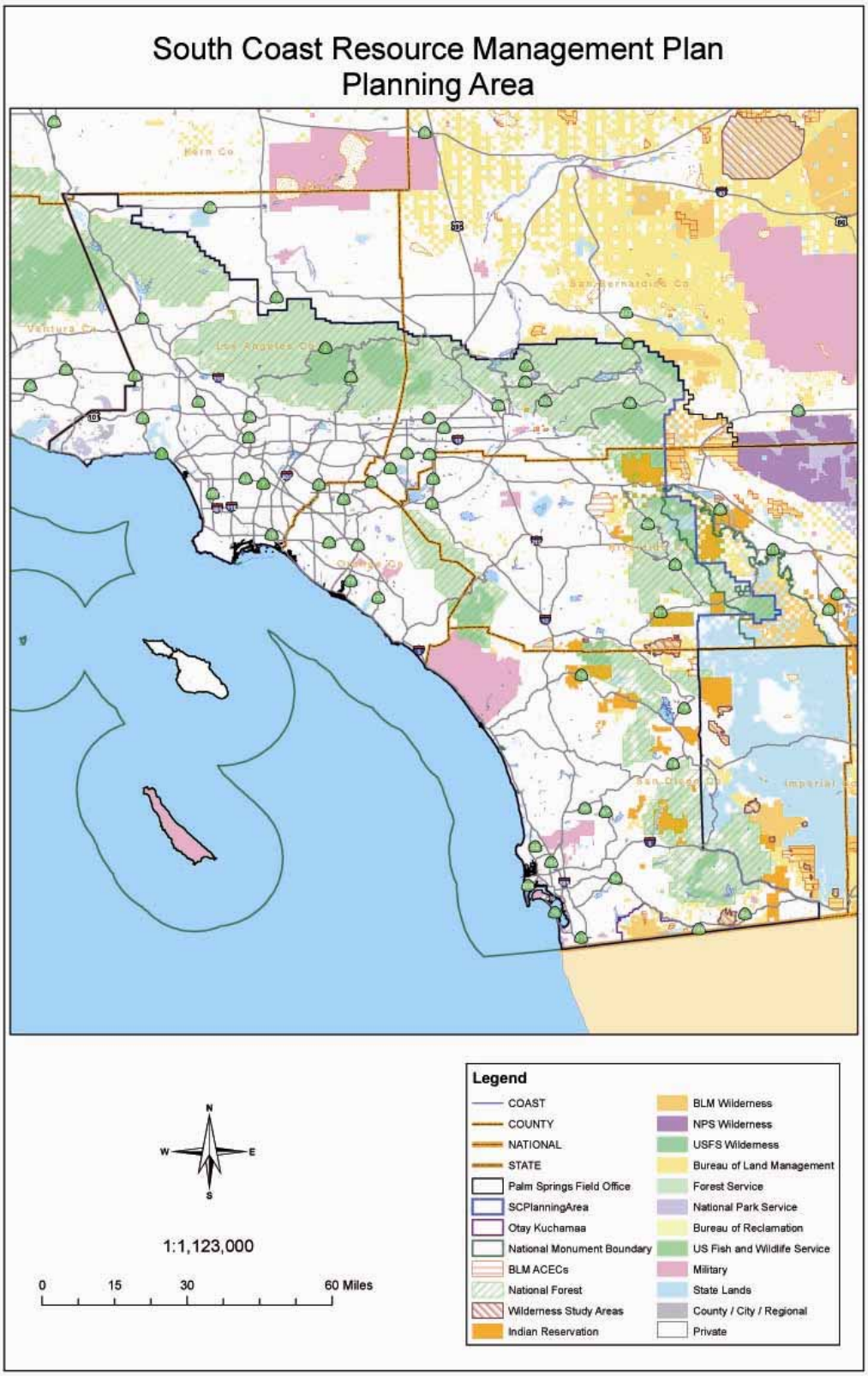
Since completion of the 1994 SCRMP, the Southern California region has undergone many changes that affect the management of public lands including accelerated population growth and demand for housing, increased demand for water, energy, and energy related transmission projects, a greater emphasis on local planning for conservation of sensitive habitat and open space, and a heightened interest in fire management planning. The BLM and its partners have also acquired over 6,000 acres to support conservation efforts of local governments. Management of these lands, and lands pending acquisition, were not addressed in the 1994 SCRMP.

The BLM has continued coordinating with Federal, State and local government agencies, Tribal Nations and private entities to effectively manage the public lands. Especially significant is the increasing importance of multi-jurisdictional planning efforts such as multi-species habitat conservation planning (in compliance with Section 10 and Section 7 of the Federal Endangered Species Act of 1973, as amended (ESA)) and the State's Natural Communities Conservation Planning (NCCP) program. The rapid urbanization of southern California and parallel loss of natural habitat has prompted the USFWS to list many new species as threatened or endangered. In order to comply with the requirements of the ESA and the State of California's Endangered Species Act, local jurisdictions are pooling their resources to address threatened and endangered species habitat conservation from a regional perspective. This regional approach is also in line with established principles of conservation biology. The BLM has been invited to participate in many of these planning efforts and has agreed to provide a portion of the Federal funding and resources needed to ensure plan success.

In September 2000, BLM completed an evaluation of the SCRMP (per BLM H-1601-1 Land Use Planning Handbook) to determine whether the land use plan decisions and National Environmental Policy Act (NEPA) analysis are still valid and if any changes are needed. Changes in some of the specific land use allocations are warranted to address new circumstances which have arisen as described above and fully described below under Anticipated Planning Issues and Management Concerns. It is recommended that a revision of the SCRMP would be appropriate to address these new circumstances.

C. Purpose

The purpose of the plan revision is to update the SCRMP to: 1) ensure consistency, to the legal extent possible, with the various multi-species planning efforts and partnership agreements BLM is working to establish throughout the South Coast region, 2) re-evaluate management direction in light of new information and change in circumstances, 3) assess the impact of BLM management on threatened and endangered species listed since 1993 through formal consultation with the USFWS, 4) assess the energy related needs of the region and meet the objectives of the President's energy plan, and 5) address issues raised in scoping.


South Coast Resource Management Plan
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Indian Reservation
BLM Wilderness
NPS Wilderness
USFS Wilderness
Bureau of Land Management
Forest Service
National Park Service
Bureau of Reclamation
US Fish and Wildlife Service
Military
State Lands
County / City / Regional
Private

D. Related Planning and Proposed Plan Amendments

In 2004 and 2005, two amendments were also proposed to the SCRMP. The Upper Santa Ana River Wash Plan Amendment and the San Diego Border Mountains Plan Amendment were started to address issues that were not resolved in the 1994 SCRMP. Neither of these plan amendments was completed and both proposed amendments will be included as alternatives in the plan revision. Public scoping comments gathered during the process for both amendments are included in this scoping report. The status of the proposed amendments was presented during public scoping meetings and workshops for the SCRMP revision.

Upper Santa Ana River Wash Plan Amendment

On April 26, 2004, the BLM published a Notice of Intent to amend the 1994 South Coast Resource Management Plan. The proposed amendment and environmental impact statement (EIS) would describe and analyze alternatives for a proposed land exchange with the San Bernardino Valley Water Conservation District. The proposed action would affect land designated as an Area of Critical Environmental Concern (ACEC) and Research Natural Area (RNA) for protection of two plants federally listed as endangered, Santa Ana River woollystar (*Eriastrum densiflorum* ssp. *sanctorum*) and slender-horned spineflower (*Dodecahema leptoceras*).

This proposed land exchange is part of a multi-jurisdictional Land Management and Habitat Conservation Plan proposed for approximately 4,365 acres located in the upper Santa Ana River Wash area in southwestern San Bernardino County. The proposed plan provides for the coordination between state and federal agencies, local government, and private-property owners (mining companies) for accommodation of existing and anticipated future activities within the Santa Ana River Wash Planning Area. The plan proposes the continuation of existing water conservation facilities; the creation of a habitat conservation area; the continuation of a flood management program; the continuation and, in some cases, the expansion of roadways and utilities; the continuation of existing trails and construction of new trails; expansion of two existing sand and gravel mining operations; and the proposed BLM land exchange.

Public workshops and scoping meetings were held in the cities of Highland and Redlands in May 2004. The alternatives developed for the Plan Amendment are: (A) Proposed Action (exchange approximately 508 acres of public lands with restrictive covenants for Conservation District lands of equal value), (B) Modification of existing land use designations on specified BLM land to permit mining activities, and (C) No Action Alternative (the exchange proposal would be rejected). Predominant issues identified so far include threatened, endangered, and other special status species, mineral resources, water resources, recreation, visual resources, cultural resources, land management, and traffic management.

As of February 2008, the SBVWCD, the mining companies, and the cities of Highland and Redlands have not completed the Draft Land Management and Habitat

Conservation Plan. The Plan Amendment and EIS for the proposed land exchange are on hold pending the public release of the Draft Land Management and Habitat Conservation Plan. The work started for the Upper Santa Ana River Wash Plan Amendment will be included in the South Coast RMP Revision. This includes the results of public scoping held in 2004.

San Diego Border Mountains Plan Amendment

Since completion of the 1994 SCRMP, the BLM continued coordinating with Federal, State and local government agencies, Tribal Nations and private entities to effectively manage the public lands. Especially significant was the increasing importance of multi-jurisdictional planning efforts such as the San Diego County Multiple Species Conservation Program (MSCP), conducted and prepared in compliance with the federal Endangered Species Act of 1973 as amended (ESA) and the State's Natural Communities Conservation Planning (NCCP) program. The MSCP, covering over 80 species and intended to preserve over 170,000 acres of habitat, was signed in 1997.

The MSCP identified over 24,700 acres of BLM managed public land as the Otay/Kuchamaa Cooperative Management Area and as a "core area" of the MSCP. In an MOU between BLM, local governments, and state and federal wildlife agencies, the BLM agreed to cooperate in the design, land acquisition, and management of the MSCP to promote biological diversity. Since 1994, the BLM acquired over 6,000 acres of sensitive habitat in support of the MSCP. These new federal lands and MSCP designations are not addressed by the 1994 SCRMP. In November 1999, the President signed the Otay Mountain Wilderness Act, designating 18,500 acres of public land as part of the National Wilderness Preservation System. Wilderness areas are part of the Bureau's National Landscape Conservation System (NLCS). New circumstances such as those described above prompted the need for an amendment to the South Coast RMP.

The BLM Palm Springs-South Coast Field Office initiated a plan amendment to address these issues in 2005. Scoping meetings and public comments indicated that the major issues for the San Diego Border Mountains Plan Amendment were consistency with the MSCP, habitat protection, public access, roads and trails, and recreation use. The purpose of the San Diego Border Mountains Plan Amendment was to: 1) ensure consistency, to the legal extent possible, with the various multi-species planning efforts and partnership agreements BLM has established in southern San Diego County, 2) re-evaluate management direction in light of new acquisitions, designations, and change in circumstances, 3) complete route-of-travel inventories and designations, and 4) assess the impact of BLM management on threatened and endangered species listed since 1994 through formal consultation with the US Fish and Wildlife Service.

For the purposes of the plan amendment, the Border Mountains planning area was defined as those public lands, approximately 30,000 acres, east of Tecate Peak, south of the Cleveland National Forest, and west of the California Desert Conservation Area boundary. This area includes the Hauser Mountain Wilderness Study Area (WSA), and

the Hauser Mountain/McAlmond Canyon wildlife habitat management area (HMA). BLM conducted route inventories for the planning area between March 2005 and January 2006. The inventory was conducted through field surveys, GIS and remote sensing, and information from the Border Patrol and Calfire. This inventory resulted in a network of approximately 110 miles of routes and ways. Maps of the inventory were presented at the public scoping meetings in February 2006.

Shortly after beginning the Plan Amendment, the Palm Springs-South Coast Field Office was directed and funded to complete a plan revision for the entire South Coast Resource Management Plan. The work started for the San Diego Border Mountains Plan Amendment will be included in the South Coast RMP Revision. This includes the results of public scoping held in 2006, route inventories for the Otay/Border Mountain Plan Amendment, and the cultural and biological surveys for the inventoried route of travel network.

Results of public scoping for the Upper Santa Ana River Wash Plan Amendment, San Diego Border Mountains Plan Amendment, and the South Coast RMP Revision are summarized below.

II. Scoping Process

A. Collaborative Planning Workshop

Planning Concepts Class

The BLM Palm Springs-South Coast Field Office held a public workshop and class on Planning Concepts (BLM Course 1610-06), January 23-25, 2007, in Temecula, California. Invitations were sent to a wide array of public agencies and non-profit interest groups. Along with 12 members of the BLM Planning Team, ten representatives of federal, state, and local agencies attended, and three members of public interest groups. A total of 25 attended the workshop.

B. RMP Revision Preparation Plan

The Field Office developed a Preparation Plan (preplan) to guide the process of revising the South Coast RMP. The preplan included proposed issues to be addressed by the plan revision, staffing and support needs, a timetable/schedule, and budget. The proposed planning issues were identified by the field office staff and through coordination with other agencies and management partners in the planning area, and the results of the Collaborative Planning Workshop. These proposed planning issues were included in the Notice of Intent, in news releases, and in handouts at the public scoping meetings. The preplan for the South Coast RMP Revision was approved and signed by the State Director on July 7, 2007.

C. Notices

Upper Santa Ana River Wash Plan Amendment

The Notice of Intent to Prepare an Amendment to the South Coast Resource Management Plan for the Santa Ana River Area of Critical Environmental Concern was published in the Federal Register on April 26, 2004.

San Diego Border Mountains Plan Amendment

The Notice of Intent to prepare South Coast Resource Management Plan Amendment for the San Diego County Border Mountains was published in the Federal Register on March 21, 2005.

South Coast Resource Management Plan Revision

The Notice of Intent to Prepare a Resource Management Plan Revision and Associated Environmental Impact Statement for the South Coast Planning Area, California was published in the Federal Register on August 7, 2007.

D. Public Scoping Meetings

Upper Santa Ana River Wash Plan Amendment

The San Bernardino Valley Water Conservation District and the BLM held two public meetings to gather comments regarding the preparation of an Environmental Impact Report (EIR) for the Upper Santa Ana River Wash Land Management and Conservation Habitat Plan and an Environmental Impact Statement (EIS) for an amendment to the South Coast Resource Management Plan for the Santa Ana River Area of Critical Environmental Concern. The meetings were held at the City of Highland Council Chambers on May 12, 2004 and at the City of Redlands Council Chambers on May 19, 2004. A presentation on the proposals was made by the environmental consulting firm LSA and Associates, and maps were displayed for the public to examine. Members of the public made verbal comments and asked questions of the representatives from the Water Conservation District, the BLM, and the cities of Highlands and Redlands. A total of 30 people attended the meetings (25 in Highland and 5 in Redlands). The BLM received no letters or written comments.

San Diego Border Mountains Plan Amendment

The BLM held Open House and public scoping meetings for the proposed San Diego Border Mountains Plan Amendment to the South Coast Resource Management Plan (RMP) in San Diego County at the Mountain Empire Community Center in Campo on February 22, 2006 and at the Dulzura Community Center on February 23, 2006. The meetings were held between 6:00 PM and 8:00 PM each night. Maps of the planning

area, including a route inventory, were displayed for public viewing and a power point slide show was presented to explain the planning process. After the short presentation, the public asked questions of BLM staff and filled out comment forms. A total of 39 people attended the meetings (13 in Campo and 26 in Dulzura). The BLM received a total of 17 written comments.

South Coast Resource Management Plan Revision

The BLM held Open House and public scoping meetings to gather public comment regarding the proposed revision to the BLM South Coast Resource Management Plan (RMP) in San Diego, Riverside, and Los Angeles Counties in 2007. The meetings were held at the Mountain Empire Community Center in Campo on December 5; the Scottish Rite Masonic Center in San Diego on December 6; the Mary Phillips Senior Center in Temecula on December 10; and at the George Caravalho Activities Center in Santa Clarita on December 12. All of the meetings were held from 4:00 PM to 8:00 PM. Maps of the planning area were displayed for public viewing and a continuous power point slide show was presented to explain the planning process. The public asked questions of BLM staff and filled out comment forms. A total of 75 people attended the meetings (32 in Campo, 16 in San Diego, 24 in Temecula, and 3 in Santa Clarita).

E. Cooperating Agencies

The cooperating agency (CA) role derives from the National Environmental Policy Act (NEPA) of 1969, which calls on federal, state, and local governments to cooperate with the goal of achieving "productive harmony" between humans and their environment. The Council on Environmental Quality's (CEQ) regulations implementing NEPA allow federal agencies (as lead agencies) to invite tribal, state, and local governments, as well as other federal agencies, to serve as CAs in the preparation of environmental impact statements. In 2005, the BLM amended its planning regulations to ensure that it engages its governmental partners consistently and effectively through the CA relationship whenever land use plans are prepared or revised.

State agencies, local governments, tribal governments, and other federal agencies may serve as CAs. CEQ regulations recognize two criteria for CA status: jurisdiction by law and special expertise. The BLM regulations incorporate these criteria.

40 CFR 1508.5 (CEQ) Defining eligibility. "Cooperating agency" means any Federal agency other than a lead agency which has "jurisdiction by law" or "special expertise" with respect to any environmental impact….A State or local agency of similar qualifications or, when the effects are on a reservation, an Indian Tribe, may by agreement with the lead agency become a cooperating agency.

The BLM sent out letters to invite agencies and tribes to participate in the planning process as Cooperating Agencies. Invitations were sent to 29 tribes and to 27 federal,

state, and local agencies. To date the following agencies have agreed to be Cooperating Agencies:

Bureau of Indian Affairs, Southern California Agency
San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy
Western Riverside County Regional Conservation Authority

A draft memorandum of understanding, outlining each agency's roles and responsibilities, has been sent to the agencies for review. When signed and returned, representatives of these agencies will participate on the planning team, and help develop alternatives and impact analysis.

III. Issue Summary

A. Summary of Public Comments, Concerns, and Opportunities

Upper Santa Ana River Wash Plan Amendment

At the first scoping meeting held in the City of Highland, verbal concerns were raised and recorded regarding the following issues:

- Trails. The ability to connect local trail systems to the Santa Ana River Trail and other regional trails and the effect of the land use plan on the continuity of trails.
- Endangered species. The effects on the Santa Ana River woollystar and the slender-horned spineflower.
- Traffic. Construction traffic on Greenspot Road and Cone Camp Road.
- Land Use. The use of land for mining instead of parks and the compatibility of the project with adjacent land uses such as housing.
- Long-term issues associated with the inability to project future problems due to the long length of the mining leases.
- Air Quality, especially dust pollution.
- Visual impacts as seen from State Route 30/210.
- Safety. Road hazards and debris from gravel trucks and spillage.
- Noise from operations and truck traffic.

San Diego Border Mountains Plan Amendment

The BLM received a total of 17 letters, fax, or e-mail comments. The majority of letters were from individuals. Comments were also received from the Center for Biological Diversity, the Wilderness Society, the President of the San Diego Wildlife Federation, and the Director of the San Diego County Department of Parks and Recreation.

The comments indicated the public was most interested in the issues of habitat and open space, access for recreation uses, limiting impacts from recreation use, and wildland fire management. Several letters from residents of the Dulzura area indicated

they were concerned over impacts to public lands adjacent to their homes from uncontrolled recreation use. The San Diego County Department of Parks and Recreation expressed support for BLM lands being managed consistent with the MSCP. Comments were grouped under the following categories. Multiple letters addressing a single topic are shown.

Protect Habitat and manage for open space values

- Preserve the natural environment and protect rural open spaces. (3)
- Lands acquired as part of MSCP should be managed consistent with MSCP preserves.
- Manage for the benefit of special status biological resources and minimize impacts.
- Minimize impacts to wilderness quality land.
- Retain all public land parcels.

Address Fire Management

- Concern about fire safety.
- Minimize impacts from over-frequent fire.

Off Highway Vehicle (OHV) Use should be limited or closed

- Prohibit cross country OHV use.
- Prohibit OHV use in Otay Mtn. Wilderness, Hauser Mtn. WSA, lands with wilderness character, citizen proposed wilderness, and roadless areas. (4)
- Prohibit OHV use in critical habitat or areas important for species covered under MSCP, ACEC's, habitat corridors, and in riparian areas. (7)
- Close as many roads to OHV use as possible. (4)
- Control OHV use in Sycamore Canyon/Clark Ranch. (3)
- Do not designate areas or open more trails for OHV use. (2)
- Restrict OHV use to routes that are closed unless posted open.
- Adopt a monitoring program that could trigger closure of areas to OHV use.
- Evaluate impacts of OHV use on all resources including habitat fragmentation.(3)
- Traffic/off road use has increased through Chicken Ranch gate and resulted in much noise, trash, and natural/cultural resource damage. (3)

Keep OHV routes open and provide more access for recreation

- All existing routes should remain open for all OHV use.
- New roads and access should be considered for recreation use.
- OHV access should be provided for handicapped and physically limited persons.
- Closure of roads or access decisions should be determined by verifiable scientific or safety data and this language must be included in planning and management guidelines. (2)
- Acquired lands should be designated Limited.
- An OHV open area should be designated to compensate for closure of routes.

Close/Open Specific Routes
Two response comments or letters

- Retain all public land parcels (specifically T18S R2E Sec 2, T18S R3E Sec. 5&6, T17S R3E Sec. 30 & 31).
- Keep route # BMH0001 open to private property and limit to street legal vehicles only. No ATVs.
- Close BMO0012 and BMO0013 which lead to private property and homes.

Recreation Use
Four response comments or letters

- Restrict, control, or eliminate shooting in Dulzura. (2)
- Target shooters have left much litter and trash and shoot too close to houses.
- Encourage BLM to work with County on future non-motorized trails planning.
- Emphasize conservation of natural lands and species and passive recreation over higher intensity uses.

Consistency with San Diego MSCP
Renee Bahl – Director, San Diego County Dept. of Parks and Recreation

- Lands acquired as part of MSCP should be managed consistent with MSCP preserves.
- Motorized trail use is not allowed in MSCP preserves.
- Encourage BLM to work with County on future non-motorized trails planning.
- La Posta/Jewell Valley and Potrero/Hauser Mtn. will be covered under East County MSCP. County encourages BLM to work with MSCP division on planning.

South Coast RMP Revision

Preliminary issues were developed and identified by BLM staff for consideration in the RMP. These preliminary issues were published in the NOI and in handouts distributed at public scoping meetings. The preliminary issues include:

- Impacts to resources posed by rapid population and urban growth;
- The need to make resource decisions that are scientifically sound, legally defensible, and sustainable;
- The need to maximize the use of public lands in species recovery and to support collaborative efforts with local governments in land use planning for habitat conservation;
- The need to provide access to significant energy and mineral resources, communication sites, and utility corridors;
- Impacts and benefits from the continuation of grazing;
- Native American concerns and traditional uses;
- Cultural resources;
- Suitability for wild and scenic rivers;
- Wilderness characteristics of acquired lands;

- Visual resources;
- Wildland fire and fuels management;
- The need to provide adequate access, open space, and facilities for safe recreation and visitation on public lands.

The BLM received a total of 53 letters, fax, or e-mail comments. The majority of letters were from individuals. Comments were also received from the California Wilderness Coalition, The Nature Conservancy, the San Diego Off-Road Coalition, the Riverside County Habitat Conservation Agency, the Southwestern Riverside County Multi-Species Reserve, the City of Temecula, the San Bernardino Valley Water Conservation District, and the Navy Region Southwest. The issues that were most commented on were related to public access and recreation uses, controlling motorized recreation and target shooting, protecting habitat and open space, fire management, wilderness designation, and cooperative management for habitat protection and conservation. Agencies managing habitat conservation plans were very interested in BLM's role and continued participation as a partner in conservation planning and protection.

Public comments were grouped under one of three issue categories. A summary of the public comments relating to each of these issues is presented below:

Issue #1: How will the natural and cultural resources of the public lands be managed?

Land Use Planning

- Do not revise South Coast RMP/retain existing management. (4)
- The City of Temecula is concerned over the proposed Liberty granite quarry (not on BLM land) and the conflicts the proposal creates for the goals of the Western Riverside County MSHCP and the South Coast RMP. (City of Temecula)
- The City of Temecula supports the BLM conducting a suitability report for the inclusion of the Santa Margarita River in the Wild and Scenic River System. The City has proposed annexation of portions of the river and would designate the area as Open Space within the City's General Plan. (City of Temecula)
- Eliminate mining and logging that benefits profit making businesses. Only allow logging and other surface disturbing activities when needed for ecosystem health.
- BLM should not allow commercial development such as homes and shopping centers on public lands in Southern California.
- Proposed energy facilities should not be allowed in roadless areas or potential wilderness areas.
- BLM should protest the Blackwater purchase of lands in the Potrero Area.
- There are a number of ACECs in the planning area that need to be expanded, including the Cedar Canyon and Tecate Peak ACECs. (The Nature Conservancy, San Diego)

- BLM is encouraged to review and consider the recommendations for conservation actions in the collaborative Las Californias report. (The Nature Conservancy, San Diego)
- Prior to disposal of isolated parcels or consolidation of BLM public lands, local agencies and non-profit conservation groups should be consulted to ensure these parcels are not key pieces of corridors or core reserves. (The Nature Conservancy, San Diego)
- Acquisition goals should be aligned and coordinated with other conservation agencies and organizations in the planning area. This can result in the leveraging of multiple funding sources. (The Nature Conservancy, San Diego)
- Change designation for BLM parcel 262-221 from "Protective Disposal" to "Exchange or Sale." (2)
- BLM should identify the Beauty Mountain, Hauser Mountain, and Otay Mountain regions as high priority areas for future acquisitions. (7)
- BLM should acquire more properties along Marron Valley Road.
- Any land disposal should be replaced with land of equal or greater biological or open space values. (The Nature Conservancy, San Diego)

Grazing

- Continue grazing (6 - from recreation comments).
- The RMP/EIS should assess suitability of lands in the planning area for grazing. (Calif. Wilderness Coalition)
- The RMP/EIS should analyze impacts of grazing on natural and cultural resources, and include an analysis of economic impacts and indirect costs of grazing. (Calif. Wilderness Coalition)

Wilderness/Roadless Areas

- Identify and protect roadless areas that have wilderness characteristics, including areas adjacent to existing BLM WSAs and Forest Service Inventoried Roadless Areas. (Calif. Wilderness Coalition)
- Manage identified WSA and roadless areas with wilderness characteristics under the Recreation Opportunity Spectrum (ROS) "semi-primitive non-motorized" category. (Calif. Wilderness Coalition)
- Close WSAs and roadless areas with wilderness characteristics to recreational OHVs, new road construction, filing of new mining claims, new reservoirs, utility/geothermal/wind energy development, and disposal of public lands. (Calif. Wilderness Coalition)

Cultural Resources

- Otay Mountain is a critical cultural resource.
- All public lands should be inventoried for Native American traditional and cultural uses before exchange or sale.
- The RMP should contain standards and guidelines for identifying and protecting cultural resources, and designate additional ACECs as needed to protect sites. (Calif. Wilderness Coalition)

Habitat Conservation and Species Recovery

- BLM lands in the South Coast planning area are valuable for habitat and provide wildlife linkages between other protected lands in the coastal mountains, desert, and Mexico and should be preserved and managed for these values. (18)
- Beauty Mountain lands should be retained and managed for wildlife preservation and habitat corridors. (2)
- Maximize habitat restoration.
- Minimize impacts from road building.
- Breeding areas for Golden eagles are in decline in Southern California. BLM should retain public lands and not transfer lands to agencies that encourage trails and public access to mountain tops and other important breeding areas. BLM should manage and preserve these lands so that there are minimal impacts from recreation and other human uses to Golden eagles and other sensitive wildlife.
- BLM should retain parcels in the Santa Clara River Watershed, manage these parcels as open space, and not allow mining or development on these parcels. (The Nature Conservancy, Ventura)
- BLM lands in the border region should be conserved to provide foraging for large landscape dependent species such as spotted owl, deer, and mountain lion. (The Nature Conservancy, San Diego)
- Adequate mitigation should be sought for any use of BLM lands which results in loss of habitat for native species, including loss due to gravel extraction, energy production, and energy transmission. (The Nature Conservancy, San Diego)
- The RMP should identify key habitat types and critical areas and develop standards and guidelines to protect and restore these areas. (Calif. Wilderness Coalition)
- All riparian areas, and habitat for listed T&E and other sensitive species, should be designated as ACECs. (Calif. Wilderness Coalition)
- The RMP should address fragmentation of habitat and migration corridors. (Calif. Wilderness Coalition)
- Prevent introduction and control the spread of invasive species. (Calif. Wilderness Coalition)

Fire Management

- The use of prescribed fire should be considered carefully for its effects on native vegetation and sensitive species habitat. Prescribed fire should only be restricted to the wildland-urban interface to protect specific communities. (The Nature Conservancy, San Diego)
- The RMP should establish an ecologically based fire restoration program so that fire can play its natural role in the planning area. (Calif. Wilderness Coalition)
- Prohibit road building as a means to accomplish vegetation treatments in furtherance of fire policy and limit mechanized suppression efforts to areas around homes and property. (Calif. Wilderness Coalition)
- Integrate fire planning with efforts to control invasive species and restore native species. (Calif. Wilderness Coalition)

Issue #2: How will recreation and public uses be managed?

Recreation – Expand OHV Use, hunting, and shooting

- Public lands should be open to multiple use recreation including OHV use, hunting, target shooting, firewood gathering, and rock hounding. (Group of 19 letters – 4 identified as San Diego Off Road Coalition)
- Develop new roads and trails. (3)
- Examine burned areas for new roads and trails. (8)
- Allow motorized vehicles on legal trails.
- Existing trails and ways should be included in route inventory.
- Comply with EO (8/17/2007) "Facilitation of Hunting Heritage and Wildlife Conservation."
- Routes for motorized vehicles in the Hauser Mountain WSA should be incorporated in the designated route of travel system.

Recreation – Limit OHV Use, hunting, and shooting

- Wilderness Study Areas, wilderness, roadless areas, adjacent lands, and future acquisitions in the planning area should be managed for habitat restoration and non-motorized recreation. (12)
- Encourage camping and hiking opportunities that have the least impact to the land, plants, and animals.
- Keep all possible traffic and vehicles out of Kuchamaa ACEC.
- Off highway vehicle use destroys wildlands and discourages or eliminates other non-motorized recreation uses such as hiking, camping, and birding. BLM should reduce or eliminate OHV use on public lands in the planning area.
- BLM should increase law enforcement and fines for OHV related violations and should impound violator's vehicles.
- Additional fees should be imposed on OHV users to mitigate destructive activities and purchase lands to replace those lands destroyed through OHV uses.
- Keep motor vehicles out of Chihuahua Valley/Rainbow Forest area (3).
- Allow only street legal vehicles in Chihuahua Valley.
- No hunting in Chihuahua Valley. (2)
- Allow OHV use and target shooting in Beauty Mountain area only where land can be "ruined", the use is supervised and monitored, and fees charged. (3)
- All BLM lands and roads within SKR Reserves should be closed to public access until public uses are determined to be compatible with SKR management. (Riverside Co. Habitat Conservation Agency)
- Active recreation should be concentrated in areas where the use can be easily contained. (The Nature Conservancy, San Diego)
- OHV use should not be permitted on roads that run through sensitive areas or where new unauthorized roads can easily be created. (The Nature Conservancy, San Diego)
- Areas with natural barriers to vehicle traffic and low habitat value should be selected as areas open to vehicle traffic and OHV use. (The Nature Conservancy, San Diego)

- Prohibit OHV use in WSA, roadless areas with wilderness characteristics, critical wildlife habitat, ACECs, and riparian areas. (Calif. Wilderness Coalition)
- Evaluate and monitor all routes designated open for impacts, and close routes if benchmarks are exceeded. (Calif. Wilderness Coalition)
- Until routes are designated through the planning process, routes should be closed pending NEPA analysis of impacts. (Calif. Wilderness Coalition)
- Determination of validity of RS 2477 claims should be deferred pending DOI clarification of BLM's legal requirements. (Calif. Wilderness Coalition)
- Eliminate OHV Open Areas and limit use to designated routes. (Calif. Wilderness Coalition)
- Complete a comprehensive inventory of routes and ways. (Calif. Wilderness Coalition)
- Develop and implement comprehensive road and way density standards for species and habitat. (Calif. Wilderness Coalition)
- Prohibit new road construction except where needed to meet ecological goals, and remove and restore roads that threaten sensitive species and habitat. (Calif. Wilderness Coalition)

Recreation – General Use

- New trailheads and campsites should be developed in the Sycamore Canyon area. (Group of 19 letters – 4 identified as San Diego Off Road Coalition)
- Retain Border Mountains SRMA. (5)
- Allow hiking, biking, and rock climbing. (1)
- Keep area open for all types of public use. (1)
- Allow hiking and horseback riding in Chihuahua Valley. (2)
- Where will target shooting, trails, and access for horseback riding be located in Million Dollar Spring ACEC?
- Allow hiking, backpacking, horseback riding, camping, wildlife viewing, hunting, and fishing in wilderness, WSA, roadless, and other areas with wilderness characteristics. (Calif. Wilderness Coalition)

Pacific Crest Trail (PCT)

- Retain all public lands crossed by the PCT and manage these lands to meet the highest visual protection standards. (US Forest Service)
- Public lands crossed by the PCT ROW should be withdrawn from mineral entry, have a "no surface occupancy" stipulation for oil and gas leasing, be unavailable for other federal leasable minerals, closed to new communication and wind energy sites, and new proposed utilities or other ROW should be located where impacts already exist. (US Forest Service)

Issue #3: How will the RMP be integrated with other agency and community plans for habitat and species recovery?

Consistency with Habitat Conservation Plans

- Examine the "MOU for Habitat Conservation Planning" for legal inconsistencies and resolve conservation conflicts with other parties.
- Insure that mineral extraction is allowed on split estate lands in habitat conservation plan areas.
- All "split estate" lands in SKR Reserves should have the mineral rights released to the underlying land owner. Mining is inconsistent with SKR management. (Riverside Co. Habitat Conservation Agency)
- BLM lands adjacent to, or within the boundary of the Southwestern Riverside County Multi-Species Reserve (parcels 191-241, 191-242, 205-082, and 205-081) should be retained in BLM ownership. (SW Riverside County Multi-Species Reserve Manager)
- SKR Reserves, regardless of ownership, should be identified on the maps of the revised RMP. (Riverside Co. Habitat Conservation Agency)
- BLM should allow the Reserve to manage the four BLM parcels within and adjacent to the Reserve pursuant to the Reserve Management Plan. (SW Riverside County Multi-Species Reserve Manager)
- BLM should continue its support of the Western Riverside County Multi Species Habitat Conservation Plan as indicated in the planning criteria for the RMP. (City of Temecula)
- The South Coast RMP identifies sensitive species but falls short of establishing goals and objectives or a system to meet management and monitoring requirements for BLM lands counted as preserve lands under adopted HCPs. Goals and objectives and a system to meet them should be included in the revised RMP. (The Nature Conservancy, San Diego)
- Reconcile Potrero ACEC descriptions between South Coast RMP and Stephen's Kangaroo Rat (SKR) Habitat Conservation Plan. Designate Badlands parcels (144-041, 144-021, and 144-101) as an ACEC. (Riverside Co. Habitat Conservation Agency)
- All BLM lands within the SKR Reserve system should be retained and designated as ACEC. (Riverside Co. Habitat Conservation Agency)
- The SCRMP revision should specify that all BLM lands in SKR Reserves are to be managed for SKR and closed to other uses until such uses are determined to be compatible with SKR management. (Riverside Co. Habitat Conservation Agency, SW Riverside County Multi-Species Reserve Manager)
- It is very important that BLM maintain ownership of lands in the Upper Santa Clara River Watershed, particularly in the State approved Conceptual Area Conservation Plan (CAPP). The CAPP identifies BLM lands as parcels critical for wildlife linkages and to connect to other agency parcels. (The Nature Conservancy, Ventura)
- Designate lands in and adjacent to the Santa Ana River Wash ACEC as "joint use lands" to facilitate the proposed land exchange, and allow for the potential for

- The Water Conservation District would not object to the designation of lands exchanged from the District to BLM as ACEC as long as the ACEC would allow for future joint use and water conservation objectives. (San Bernardino Valley Water Conservation District/Rutan)

Recreation and Public Purpose Act Leases

- Analyze the existing Recreation and Public Purpose Act leases for returning management to BLM.

Military Operations and Training

- The Department of Defense requests that BLM notifies and coordinates with DOD agencies at the earliest stages of land use planning, permitting, and authorization of proposed projects that could affect current and future military operations and training. (Navy Region Southwest).

B. Issues and Decisions to be Made

Issues Identified through Scoping

The 12 preliminary issues developed and identified in the pre-plan were presented for review and consideration during scoping. These preliminary issues were published in the NOI and in handouts distributed at public scoping meetings. In general, the public, interest groups, and government agencies identified the following issues as important for management of the public lands in the South Coast Planning Area. These issues will be carried forward through the development of the alternatives for the plan revision.

- The need to conserve public lands for species recovery and to support collaborative efforts with local governments for habitat conservation;

- The need to provide adequate access, open space, and opportunities for safe recreation and visitation on public lands;

- Wilderness characteristics of acquired lands;

- Wildland fire and fuels management.

Planning Criteria

Planning criteria (43 CFR 1610.4-2) are parameters which guide development of the plan revision to ensure the planning process is tailored to the issues and that unnecessary data collection is avoided. Planning criteria are based on standards prescribed by applicable laws and regulations, agency guidance, and the result of

coordination with the public, Tribes, and other Federal, state and local government agencies. A preliminary list of planning criteria for the SCRMP revision was made available for public review and comment when the Notice of Intent is released. No comments from scoping were received which would change the preliminary planning criteria, and these will be carried forward in the planning process.

General Planning Criteria

- The plan will be completed in compliance with the Federal Land Policy and Management Act (FLPMA) and all other applicable laws.

- The planning process will include an environmental impact statement that will comply with the National Environmental Policy Act (NEPA) standards.

- The plan will establish new guidance and identify existing guidance upon which the BLM will rely in managing public lands within the South Coast Planning Area.

- The RMP/EIS will incorporate by reference the *Standards for Rangeland Health and Guidelines for Livestock Grazing Management*.

- The RMP/EIS will incorporate by reference all prior wilderness designations and wilderness study area findings that affect public lands in the planning area.

- The plan will result in determinations as required by special program and resource specific guidance detailed in Appendix C of the BLM's Planning Handbook.

- Decisions in the plan will strive to be compatible with the existing plans and policies of adjacent local, State, Tribal, and Federal agencies as long as the decisions are in conformance with legal mandates on management of public lands.

- The scope of analysis will be consistent with the level of analysis in approved plans and in accordance with Bureau-wide standards and program guidance.

- Geospatial data will be automated within a Geographic Information System (GIS) to facilitate discussions of the affected environment, alternative formulation, analysis of environmental consequences, and display of the results.

- Resource allocations must be reasonable and achievable within available technological and budgetary constraints.

Specific Planning Criteria for the South Coast Planning Area

Valid Existing Rights and Other Authorizations

Nothing in this proposed Plan revision shall be construed as terminating any valid lease, permit, patent, right-of-way, or other land use right or authorization existing on the date of approval of the SCRMP Revision. The SCRMP revision shall apply only to BLM-managed public lands and shall not be construed to affect activities on adjacent private, State, Tribal or other Federal agency lands.

Consistency with Other Federal, State, Tribal and local governments

In accordance with BLM planning regulations at 43 CFR 1610.3-2, BLM planning documents shall be consistent with officially approved resource related plans, policies and programs of other Federal agencies, State and local governments, and Indian Tribes, so long as the guidance and plans are consistent with the purposes, policies and programs of Federal laws and regulations applicable to public lands.

The need for definitive decisions and yet flexibility in BLM planning documents is of particular importance for multi-jurisdictional planning efforts such as the State's Natural Communities Conservation Planning program and multi-species habitat conservation planning, to which BLM continues to be a major contributor.

This planning process will involve Native American tribal governments and will provide strategies for protecting recognized traditional uses by Native Americans of the public lands and resources.

Area of Critical Environmental Concern Designations

The BLM will consider designating new ACECs or modifying existing ACECs in accordance with direction provided in 43 CFR 1610.7-2.

Wildlife Management

The BLM recognizes the State's responsibility to manage wildlife, and in accordance with regulations, BLM will consult with the California Department of Fish and Game before proposing no-hunting zones or periods for the purposes of protecting public safety, administration, or public use and enjoyment.

Off Highway Vehicle (OHV) Area Designations

BLM planning guidance (H-1601-1) requires all OHV area designations to be conducted through the 43 CFR 1600 land use planning process. OHV area designations determine whether parcels of public lands are closed, limited, or open to OHV use. A Travel Management Plan, including route designations, may also be included in the planning process, though route designations are considered activity level plan

decisions. The plan revision proposes to include a Travel Management Plan in addition to OHV area designations.

Cultural Resources

This plan revision will be consistent with the National Historic Preservation Act and other cultural resource laws, 36 CFR 800 and Executive Orders.

Planning and NEPA Guidance

The proposed plan revision will not amend the majority of the decisions, goals and objectives established in the 1994 SCRMP. However, these decisions will be evaluated and those that are determined to still be valid will be carried forward into the revised SCRMP.

Wilderness

1. Designated Wilderness and Wilderness Study Areas (WSAs)

   The SCRMP revision will establish management guidance for all designated wilderness and wilderness study areas.

2. Management of Other Lands with Wilderness Characteristics

   The SCRMP revision will evaluate lands outside of designated wilderness and WSAs (including acquired lands) for wilderness characteristics and determine appropriate means to manage them.

California Coastal National Monument

Issues and allocations that pertain to the California Coastal National Monument (CCNM) will not be considered within this planning process. The portions of the CCNM within the South Coast Planning Area will be managed according to the California Coastal National Monument Resource Management Plan and Record of Decision, approved September 2005.

C. Issues Raised that will not be Addressed

Most of the comments raised were within the scope of the RMP revision and addressed issues that were developed by the BLM. Some comments and issues will be more appropriately addressed in activity level planning such as for Special Recreation Area Management Plans. Examples would be comments regarding hunting and target shooting, development of specific campgrounds or other facilities, rockhounding and wood collecting, law enforcement methods and fines, and staffing levels for the BLM. Other comments addressed issues that are outside the scope of an RMP, or outside the

jurisdiction of the BLM. The following issues will not be addressed or are outside the scope of the RMP revision for the reasons stated:

- Determination of validity of RS 2477 claims should be deferred pending DOI clarification of BLM's legal requirements. *The BLM will not address RS 2477 claims in the RMP revision. Designation of routes as open, limited, or closed as part of the RMP does not imply a final decision by BLM on RS 2477 claims that may be made by the state or counties.*

- Eliminate OHV Open Areas and limit use to designated routes. *There are no open areas designated under the existing RMP. A system of designated routes will be proposed under the alternatives.*

- Complete a comprehensive inventory of routes and ways. *An inventory of existing routes and ways has been completed as part of the RMP revision. The inventory will be available for the public to review during the planning process and as part of the draft RMP/EIS.*

- Develop and implement comprehensive road and way density standards for species and habitat. *Impacts to species and habitat from the alternatives for route designations will be analyzed in the draft EIS.*

- BLM should increase law enforcement and fines for OHV related violations and should impound violator's vehicles. *Law enforcement penalties are not set under planning regulations or authorities and are outside the scope of the RMP revision.*

- Additional fees should be imposed on OHV users to mitigate destructive activities and purchase lands to replace those lands destroyed through OHV uses. *Fees for recreation uses are set under BLM policy and regulations and are outside the scope of the RMP revision.*

- Eliminate mining and logging that benefits profit making businesses. Only allow logging and other surface disturbing activities when needed for ecosystem health. *The South Coast Planning Area does not contain forest product resources and logging is not an activity that is occurring or is anticipated. Mining on public lands is addressed by law and regulation unless public lands are withdrawn from mineral entry.*

- BLM should not allow commercial development such as homes and shopping centers on public lands in Southern California. *Public lands are not available for private homes or commercial developments. Public lands that may be available for sale or disposal will be addressed under the land tenure alternatives.*

- BLM should protest the Blackwater purchase of lands in the Potrero Area. *The use of private lands is outside the jurisdiction of the BLM.*