RECORD
OF
DECISION

TO THE **1986**
PLAN
AMENDMENTS

To The
CALIFORNIA
DESERT
PLAN

and the
EASTERN
SAN DIEGO
COUNTY MFP

U.S. Department of the Interior
BUREAU OF LAND MANAGEMENT

Riverside, California
December, 1987

1088014749

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

CALIFORNIA DESERT DISTRICT

1695 Spruce Street
Riverside, California 92507

IN REPLY REFER TO:

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(C-060.2)

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BLM LIBRARY

Memorandum

To: State Director (C-910)
From: District Manager, California Desert
Subject: 1986 Amendment Decision

BLM LIBRARY
SC-324A, BLDG. 50
DENVER FEDERAL CEN.
P. O. BOX 25047
DENVER, CO 80225-CO.

Enclosed is the Record of Decision for the 1986 amendment review of the California Desert Plan indicating my approval of the amendments.

The enclosed document is provided for your review and concurrence.

Conrad E. Linn

Enclosure

BLM LIBRARY

I concur with the California Desert District Manager's amendment decisions.

Ed Hanter 11/19/87
State Director, California

RECORD OF DECISION

The 1986 amendment review of the California Desert Conservation Area Plan was conducted in accordance with Bureau of Land Management Planning Regulations, (43 CFR 1610.5-5), with the procedures set forth in Chapter 7 of the CDCA Plan 1980, and with the Council on Environmental Quality regulations for implementing the National Environmental Policy Act (40 CFR 1500).

During a 30-day period, from February 14 to March 17, 1986, eighteen amendments were proposed by the public and by the BLM staff. These were screened by BLM management and were considered by the California Desert District Advisory Council at a public scoping meeting held on April 10, 1986 in Riverside. Six proposals were accepted for consideration in the environmental assessment (EA). The remainder were rejected or handled through other administrative processes (see Appendix B of the EA).

The public comment period on the EA extended from December 10, 1986 to February 11, 1987. Forty-six written comments were received. Oral comments were accepted at the November meeting of the Advisory Council in Palm Springs.

The preferred alternative for all amendments are the same as those described in the environmental assessment.

The combination of approved amendments comprises the sixth amendment to the Desert Plan. Each component amendment is described below. The environmentally preferred alternative is identified except when there is no significant difference. An overview of public input and responses to specific questions is given in the appendix to this Record of Decision.

Finding of No Significant Impact

The environmental assessment identified no significant effects on the human or natural environment. Therefore, an environmental impact statement is not required.

AMENDMENT ONE

VEHICLE ACCESS IN NORTH SALINE VALLEY

Proposed Amendment

Change the boundary of the vehicle closure area in North Saline Valley.

Other Alternatives Considered

No Action (environmentally preferable alternative)

Decision

Accept proposed amendment with modification. Boundary of the vehicle closure would be changed to exclude route S-014; the rest of the closure would be left unchanged.

Rationale

Only route S-014 would be opened. It is a 2 mile-long "cherrystem" into WSA 117 and is passable to 4-WD vehicles. Opening this route is expected to have no detrimental effects on the resources of the surrounding area. The other boundary changes were denied, since they would involve opening routes F-030110 and S-0716, both of which are impassable to 4WD vehicles and could not be used without extensive reconstruction which would impair the wilderness quality of WSA 117.

Implementation Needs

None

District Manager

12/11/87
Date

AMENDMENT 1

BOUNDARY CHANGE SALINE VALLEY CLOSURE

— Original Boundary/Closure

Delete from Closure

AMENDMENT TWO

MOTORIZED VEHICLE ACCESS IN OROCOPIA MOUNTAINS

Proposed Amendment

Change motorized vehicle access designation in the Orocopia Mountains from "closed" to "limited."

Other Alternatives Considered

No Action

Decision

Accept Proposed Amendment

Rationale

When this area was designated "closed" in the Interim Critical Management Plan (ICMP) and the CDCA Plan, three routes were left open. In subsequent planning actions (the vehicle route designation process and the Orocopia Mountains Habitat Management Plan) all vehicles routes were reviewed, and changes in access were made to improve managability of the area. Two formerly open routes which lead to wildlife water sources were closed on a seasonal basis (June 1 to November 1) for the benefit of bighorn sheep and other wildlife which need unrestricted access to these resources in the summer months. Other routes leading to springs which were closed under the ICMP will remain closed. A few routes were opened; two of these are almost entirely on privately owned land. The Bureau believes this "limited" designation, coupled with guidelines of the Wilderness Interim Management Policy for the Orocopia Mountains WSA, will provide adequate protection for resources and a more appropriate vehicle designation.

Implementation Needs

None

District Manager

12/11/87

Date

AMENDMENT 2

CHANGE VEHICLE ACCESS OROCOPIA MOUNTAINS

- Closure Boundary
- WSA Boundary
- Public Land
- Private Land

ROUTE #	ALTERNATIVE A "LIMITED"	ALTERNATIVE B "CLOSED" (No Action)
1	OPEN	CLOSED
2	SEASONAL	OPEN
3	OPEN	OPEN
3A	OPEN	-----*
4	SEASONAL	OPEN
5	CLOSED	CLOSED
6	SEASONAL	CLOSED
7	CLOSED	CLOSED
8	OPEN	CLOSED
9	OPEN	-----*

* Route was not designated in ICMP or Desert Plan

AMENDMENT THREE

MODIFY BOUNDARY OF SALINE VALLEY ACEC

Proposed Amendment

Modify the boundary of the Saline Valley Area of Critical Environmental Concern (ACEC) as recommended in recently prepared ACEC management plan (environmentally preferable alternative).

Other Alternatives Considered

No Action

Decision

Accept Proposed Amendment

Rationale

The Saline Valley ACEC was designated to provide protective management for significant wildlife habitats (sand dune, mesquite-thicket, meadow and wetland) and prehistoric and historic cultural resources. The area to be added to the ACEC contains important water sources, habitats surrounding the marsh, co-reserve lands owned by the California Department of Fish and Game, and archeological and historical sites.

Implementation Needs

None

District Manager

Date

**ACEC 4
SALINE VALLEY
MODIFY BOUNDARY**

AMENDMENT 3

Original ACEC Boundary
ACEC Addition

AMENDMENT FOUR

REMOVE BURROS FROM HERD MANAGEMENT AREA "J"

Proposed Amendment

Eliminate the Kramer Herd Management Area (area "J") designation and reduce burro population to zero (environmentally preferable alternative).

Other Alternatives Considered

No Action

Decision

Accept Proposed Amendment

Rationale

Over the past several years, burros have been migrating from the designated herd management area into Edwards Airforce Base, specifically to the east and south sides of Rogers Dry Lake. They are causing damage to archaeological sites, one of which may be eligible for the National Register. In addition, the animals present a potential interference with aircraft operations.

Implementation Needs

None

District Manager

Date

**ELIMINATE KRAMER
HERD MANAGEMENT AREA
(HMA 'J')**

AMENDMENT 4

AMENDMENT FIVE

BOUNDARY CHANGE
UTILITY CORRIDOR BB

Proposed Amendment

Shift the portion of corridor BB between Zzyzx and Shadow Mountain to the north side of Interstate 15.

Other Alternatives Considered

No Action

Decision

Accept Proposed Amendment

Rationale

This portion of corridor BB is presently within the East Mojave National Scenic Area and is sensitive to the routing of a utility line. The realignment would preclude future utilities from being located within this portion of the Scenic Area. That portion of the amended corridor which is within wilderness study areas 228 and 242 would not be useable until (and only if) Congress decides not to designate the area as wilderness.

Implementation Needs

None

District Manager

Date

**AMENDMENT 5
BOUNDARY CHANGE
UTILITY CORRIDOR BB**

Original Utility
Corridor BB

Amended Location/
Corridor BB

AMENDMENT SIX

CARRIZO GORGE WILDERNESS STUDY AREA

Proposed Amendment

Within the San Diego County Planning Unit, change two acres of the Carrizo Gorge Wilderness Study Area from Class L to Class C (environmentally preferable alternative).

Other Alternative Considered

No Action

Decision

Accept Proposed Amendment

Rationale

The two acres originally designated as Class L were designed to provide off-road vehicle access to scenic overlooks within the Carrizo Gorge WSA. Field evaluations conducted since the completion of the Eastern San Diego County Management Framework Plan have shown that the overlooks were incorrectly mapped; one was outside the WSA and the other was only partly inside the WSA boundary. Thus, OHV access is not needed. In addition, prohibiting vehicle access would protect the rare peninsular bighorn sheep.

District Manager

12/1/87

Date

WSA Boundary

Change from "L" to "C"

Incorrect Overlook Site *

Corrected Overlook Site ▲

AMENDMENT 6

CARRIZO GORGE WSA

SUMMARY OF PUBLIC COMMENTS

GENERAL OVERVIEW

The environmental assessment on the 1986 Amendments to the California Desert Plan and Eastern San Diego County Management Framework Plan (MFP) was released for public review on December 10, 1986. The comment period extended to February 11, 1987. Forty-six letters were received during that period. An opportunity for oral comment was provided at the California Desert District Advisory Council meeting on November 6, 1986 in Palm Springs.

The letters came from the following sources: 25 (55%) from individuals, 11 (24%) from organizations, seven (15%) from governmental agencies, two (4%) from utilities, and one (2%) from a business. Nine (20%) of the respondents were located in the California Desert, 24 (52%) were in other parts of Southern California, ten (22%) were in Northern California, and three (6%) were in other states.

The majority of comments from individuals favored conservation and protection of natural resources and opposed expansion of off-road vehicle access. Approximately 30 of the respondents commented on all six of the proposals; others limited their comments to one or a few of the amendments.

SUMMARY OF COMMENTS BY AMENDMENT

AMENDMENT ONE - VEHICLE ACCESS IN NORTH SALINE VALLEY

Only one respondent favored Alternative A, which would change the boundaries of the North Saline Valley closure to allow vehicle access on several routes. The rest of the comments were almost equally divided between those who wanted to prevent any new vehicle access and those who agreed with the Bureau's modification to permit opening of the short route S-014 in the Jackass Flats area. Opposition to the amendment was due to concerns about opening up a route to Death Valley through the Last Chance Canyon Range, with possible endangerment of the habitat of the rare plant Dedeckera eurekaensis. There was also opposition to the opening of routes south of the Jackass Flats area due to potential damage by ORVs.

AMENDMENT TWO - VEHICLE ACCESS IN OROCOPIA MOUNTAINS

A large majority of the comments on Amendment Two opposed the proposal to change the motorized vehicle designation from "closed" to "limited" in the Orocochia Mountains. The major concern of respondents was the potential effect of increased off-road vehicle use on the Orocochia Mountains Wilderness Study Area and on its biological resources. The bighorn sheep and the desert tortoise were wildlife species mentioned several times. The unique geological formations within the closure were another resource in need of protection, according to one correspondent. The three respondents who favored the amendment provided no rationale.

Questions on the locations of routes of travel within the closure indicated that more information was needed on this topic. These and other questions and comments are addressed in the following section.

AMENDMENT THREE - MODIFY BOUNDARY OF SALINE VALLEY ACEC

This proposal was approved by all respondents who mentioned it except for three who stated that some of the land to be added to the ACEC is heavily mineralized; they feared that ACEC status would restrict mineral exploration and development of this land. Those favoring the amendment supported BLM's effort to protect marshlands and streamside habitat, as well as cultural and historical sites.

AMENDMENT FOUR- REMOVE BURROS FROM KRAMER AREA

Two-thirds of the 46 respondents commented on this amendment. All of them favored removal of federal burros from the Kramer Hills. Reasons given were protection of wildlife habitat (desert tortoise and Mojave ground squirrel), reduction of soil erosion, protection of native vegetation and cultural resources, and removal of a nuisance to U.S. Air Force Operations at Edwards Air Force Base.

AMENDMENT FIVE - MOVE UTILITY CORRIDOR BB TO THE NORTH OF INTERSTATE L5

Again, two-thirds of all the respondents mentioned this proposal. A large majority opposed the amendment. Most listed reasons for not wanting the corridor extended to the north; a few insisted that it not pass through the East Mojave National Scenic Area on either the north or the south side of the interstate. The most common concerns were the Halloran Wash ACEC and the two Wilderness Study Area (Nos. 228 and 242) north of I-15, which the writers feared might be damaged by the construction and maintenance of utility lines and other facilities. Several respondents noted that the Shadow Valley tortoise habitat would be endangered by extension of the corridor to the north. A utility company opposed the amendment because the usable width of the realigned corridor would be only about one-quarter mile as it passes south of the WSAs. They wanted to maintain a 3-mile-wide usable corridor. A governmental agency stated that the proposed corridor would infringe on numerous mines, claims, and mineral deposits and that utility facilities would affect the potential for open-pit mine development and mine waste disposal in the area. These concerns are addressed in the following section.

AMENDMENT SIX - CARRIZO GORGE WILDERNESS STUDY AREA

With one exception, all commenters on this proposal endorsed the Bureau's decision to make this small change in the Carrizo Gorge Wilderness Study area. The lone dissenter recommended keeping the short route open for the benefit of people who are unable to walk the short distance to the overlook.

AMENDMENTS NOT CONSIDERED

Several respondents questioned the decision to not consider amendment proposal 86-P-3, which asked for a change in vehicle access in the Randsburg area from "limited" to "closed." The proponent gave as rationale the recent proliferation of ORV trails near Randsburg and the resultant soil erosion and potential endangerment of biological resources. The Bureau's reasons for dropping the proposal was that the Randsburg-Rand Mountain area has been a subject of the earlier studies which determined that the present multiple use classification and vehicle access designation were appropriate for the

resources and activities in the area. Opponents of this point of view noted the declining populations of the desert tortoise in areas of ORV use and stated that the Bureau is not taking action to protect this species. These comments are addressed in the following section.

Another proposal which a member of the public wished the Bureau to pursue was 86-P-12, which requested a change in the wilderness recommendation for the Coyote Mountains from non-suitable to suitable. This action would provide long-term protection for recently located paleontological and archeological resources. The respondent wanted proof that the Bureau had the methods and the necessary financing to provide adequate protection for these resources under the present non-suitable status.

SPECIFIC COMMENTS AND RESPONSES

The following table presents specific comments made by individuals, organizations, and governmental agencies during the 60-day public review period and the responses to those comments. The comments pose specific questions regarding the environmental assessment. They are direct excerpts from the original letters rather than summaries. The table lists the commenter, the comment, and the BLM response. Whenever other respondents raised the same question, they are listed beneath the first commenter.

SPECIFIC COMMENTS AND RESPONSES

COMMENTS	COMMENT	RESPONSE
U.S. Forest Service Inyo National Forest	<u>AMENDMENT ONE - VEHICLE ACCESS NORTH SALINE VALLEY</u>	
	Proposed amendment number one would change the vehicle closure area in North Saline Valley. This area is adjacent to the Paiute wilderness and the Whippoorwill Flats Research Natural Area, both of which are proposed designations in our Forest Land Management Plan. Because of the proximity of your proposed action to these sensitive resources, we encourage some discussion of the influence of increased vehicle access as it may impact adjacent areas in the Environmental Consequences Chapter.	The amendment, as proposed, would have opened four routes on the east side of the Saline Valley county road. None of these roads leads towards the National Forest. The modified alternative would open two miles of route S-014 to vehicle use. Such use would be separated from the National Forest by the county road and a strip of BLM land on the west side of the county road.
Ted Rado, Defenders of wildlife	Explain in your final EA: (a) why this amendment has been accepted (i.e., what "new" information not available during the formation of the Desert Plan and subsequent development of area route designations has been submitted); and (b) whether the amendment proponent has previously commented during the subject area route designation process and, if so, what the BLM formal response to the proponent was during this time.	The route changes were requested during the route designation process but were denied, since the routes are within a closed area. Changes to closure boundaries can only be made through a plan amendment.

SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
	<p><u>AMENDMENT ONE - VEHICLE ACCESS NORTH SALINE VALLEY</u></p> <p>The rationale presented for selection of the preferred alternative on page 2-2 states that route S-014 would be excluded from the vehicle closure while closure would remain unchanged with regard to Routes F-30110 and S-0716. However, the map supposedly depicting this shows Route S-014 within the closed area while two deletions from the closure are bounded by Routes F-30110 and S-0716. The supplementary information on page 3-4 states that the amendment would affect 19,800 acres of land and 29 miles of routes. These figures seem to relate to all three roads; if so, what are the figures for Route S-014 alone? Please clarify these apparent discrepancies in the Final Environmental Assessment.</p>	
USDI Fish & Wildlife Service (USFWL)		<p>The map has been corrected. Route S-014 is two miles long. Approximately 300 acres would be removed from the closure.</p>
Ted Rado, R. Mondt, Defenders of Wildlife	<p>The Service also contests the need to open the road. If public use of the road (or roads) would be low, as stated on page 4-1 of your document, seems that this change is being proposed to satisfy a small segment of users while putting wildlife and sensitive plant habitats at increased risk of disturbance. We therefore question the wisdom of opening new vehicle access in North Saline Valley and urge the Bureau of Land Management (Bureau) to reject this amendment.</p>	<p>As stated in the environmental assessment p. 4-2, the Bureau believes that opening route S-014 will cause no significant adverse effects on vegetation or wildlife. The possibility of damaging cultural resources cannot entirely be ruled out, though none are known to exist in this immediate area.</p>

SPECIFIC COMMENTS AND RESPONSES

COMMENTS	COMMENT	RESPONSE
USDI Fish & Wildlife, Ted Rado, Desert Tortoise Council	<p align="center"><u>AMENDMENT TWO - VEHICLE ACCESS IN ORCOPIA MOUNTAINS</u></p> <p>The map provided to illustrate the proposed changes shows a large area of the Orocoopia Mountains with no routes marked on it. To enable the reviewer to better assess the possible effects of this amendment on the areas's wildlife, these roads should be marked on the map and their lengths given in the text.</p>	<p>The map has been corrected. Each route has been numbered. To clarify the description of proposed vehicle access given on pages 3-4 and 3-5 of the Environmental Assessment, the status of each route is described below. The mileages given are approximate.</p>
		<p>Two routes in the southern portion of the amendment area, Route 1 (0.6 miles) and Route 8 (0.6 miles), were changed from closed to open. A third route, #3 (2 1/4 miles), also open under the ICMP, will remain open.</p>
		<p>Two routes which were open under the ICMP will now be open seasonally and closed between June 1 and November 1 to prevent human interference with access by wildlife to a water guzzler and a spring (Route 2, 2 miles and Route 4, 4 1/2 miles). The presence of motorized vehicles and recreationists at watering spots precludes regular use by wildlife, including bighorn sheep and burro deer, and puts an added strain on already limited resources. Route 5 (1/4 mile) leads to a spring; it was closed under the ICMP and will remain closed year round. Route 6, which was</p>

SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Ted Rado	I recommend modification of the preferred alternative in the following manner: (a) three individual routes designated as "open" during the route designation process, which traverse a "short section" of the currently "closed" area can remain as "open"; (b) remaining route closures should stand. Modification of the entire "closed" area simply to accommodate land-owners peripheral to the "northern portion" of the subject area is not necessary, is contrary to the prior Interim Management Plan and subsequent Route Designation Process, and is not necessary based on information provided to this reader in the draft EA.	closed under the ICMP, will continue to be closed during the June 1 and November 1 season. Route 7 (1/2 mile), which leads to Canyon Spring, will also remain closed as it was under the ICMP. Please see response to preceding comment.
Defenders of Wildlife, Yuma Audubon Society	We believe that Amendment #2 is overbroad and lacking in precise justification. For example, it appears that modest changes in only three short routes located in the northern portion of the amendment area are the basis for this recommendation change. BLM should either reject Amendment #2, or perhaps modify the preferred alternative to only enable access within these three short routes.	Please see response to preceding comment.

SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
USDI Fish & Wildlife, Ted Rado, Desert Tortoise Council	<p align="center"><u>AMENDMENT TWO - VEHICLE ACCESS IN ORCOPIA MOUNTAINS</u></p> <p>The map provided to illustrate the proposed changes shows a large area of the Orocopia Mountains with no routes marked on it. To enable the reviewer to better assess the possible effects of this amendment on the areas's wildlife, these roads should be marked on the map and their lengths given in the text.</p>	<p>The map has been corrected. Each route has been numbered. To clarify the description of proposed vehicle access given on pages 3-4 and 3-5 of the Environmental Assessment, the status of each route is described below. The mileages given are approximate.</p> <p>Two routes in the southern portion of the amendment area, Route 1 (0.6 miles) and Route 8 (0.5 miles), were changed from closed to open. A third route, #3 (2 1/4 miles), also open under the ICMP, will remain open.</p>
		<p>Two routes which were open under the ICMP will now be open seasonally and closed between June 1 and November 1 to prevent human interference with access by wildlife to a water guzzler and a spring (Route 2, 2 miles and Route 4, 4 1/2 miles). The presence of motorized vehicles and recreationists at watering spots precludes regular use by wildlife, including bighorn sheep and burro deer, and puts an added strain on already limited resources. Route 5 (1/4 mile) leads to a spring; it was closed under the ICMP and will remain closed year round. Route 6, which was</p>

SPECIFIC COMMENTS AND RESPONSES

COMMENTS	RESPONSE
<p>closed under the ICMP, will continue to be closed during the June 1 and November 1 season. Route 7 (1/2 mile), which leads to Canyon Spring, will also remain closed as it was under the ICMP.</p> <p>Please see response to preceding comment.</p>	
<p>I recommend modification of the preferred alternative in the following manner: (a) three individual routes designated as "open" during the route designation process, which traverse a "short section" of the currently "closed" area can remain as "open"; (b) remaining route closures should stand. Modification of the entire "closed" area simply to accommodate landowners peripheral to the "northern portion" of the subject area is not necessary, is contrary to the prior Interim Management Plan and subsequent Route Designation Process, and is not necessary based on information provided to this reader in the draft EA.</p>	
<p>Defenders of Wildlife, Yuma Audubon Society</p>	<p>We believe that Amendment #2 is overbroad and lacking in precise justification. For example, it appears that modest changes in only three short routes located in the northern portion of the amendment area are the basis for this recommendation change. BLM should either reject Amendment #2, or perhaps modify the preferred alternative to only enable access within these three short routes.</p>

SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
	<p>Furthermore, not enough information provided. We know that impacts will occur but the severity of those impacts are not well defined. On page 4-4 under "wildlife" it is stated "Although all known routes have been inventoried and designated to prevent impacts to wildlife, some existing routes could have been omitted from the initial inventory". Under a limited use designation those routes would be open. Under no action, they would be closed. Because it is unknown how many such roads there are, and where they are located, it is very difficult to assess the magnitude of impacts to wildlife, vegetation, wilderness, cultural resources, etc. Due to this uncertainty, this important area (a WSA presently in a bill before congress, an area of importance for bighorn sheep and deer) should remain closed until an adequate inventory of roads and environmental impacts can be performed.</p>	<p>Please see preceding response. All known routes are shown on the map. If vehicle use of those routes which are designated open or seasonally open should cause impairment of wildlife habitat, wilderness suitability or other resources, routes could be closed through the annual route designation amendment process. If additional routes are identified in the future, access to those routes would be determined by the same process.</p>
USDI Fish & Wildlife	<p>Perhaps most importantly, the eastern half of the new proposed limited area is within the Chuckwalla Bench desert tortoise crucial habitat area; if the proposed changes lead to increased vehicle use, the desert tortoise would suffer adverse impacts. Because these roads "are located in the northern</p>	<p>The eastern half of the currently closed area contains tortoise densities of 20-50 per square mile according to the most recent density maps. The far northeastern corner of the closed area (4.3 sq. mi. of public land and 4.0 sq. mi. of private land)</p>

SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
	<p>portion of the amendment area and are primarily on private lands", as is stated on page 3-5 of the Environmental Assessment, and because both the botanic and wildlife resources of the area will be adversely affected (Table 2-2), we suggest that the Bureau reject this amendment as described.</p>	<p>is within the Chuckwalla Tortoise Crucial Habitat Area.</p> <p>Within the 20-50 per sq. mi. density area, one route (#9) which was previously identified will be opened under Alternative A. Of four short spur roads within this area, three would remain closed (#5,7,8), and one (#6) would be open during the tortoise season. One longer route (4) is currently open and would remain open during the tortoise season. Thus, within the moderate density area, only two new routes would be opened in Alternative A.</p>
Desert Tortoise Reserve Committee	<p>The BLM did not adequately consider impacts to desert tortoises which occur in densities of 20 to 50 per square mile. Increased access and increased use by recreationists will undoubtedly result in increases in vandalism, collections of tortoises and vehicle kills. Our members have reports of tortoises killed by gunshots in this area in the 1970's.</p>	<p>It is anticipated that these additional open routes (one very short and one previously unidentified) will not significantly increase vandalism, collecting, or vehicle kills. Tortoise populations should not be significantly affected by the amendment.</p>
Desert Tortoise Council	<p>The BLM has no desert tortoise study plots in the Orocopia and has no way of assessing</p>	<p>The BLM has identified 16 of the 28 tortoise trend plots for continued monitoring. (One of these plots is nearby on the Chuckwalla Bench). It is our intent to monitor four plots per year on a four-year cycle. Funding shortages in 1983 and 1984, precluded surveying any plots; this threw the schedule behind. Since that time four plots were surveyed in 1985 and four in 1986. Five plots are to be surveyed in 1987.</p>

SPECIFIC COMMENTS AND RESPONSES

<u>COMMENTER</u>	<u>COMMENT</u>	<u>RESPONSE</u>
Desert Tortoise Council	<p>whether vandalism, collections, and vehicle kills occur. The promise of "monitoring" is an empty one because BLM does not have the funds or workforce to adequately monitor the 14 desert tortoise study plots already in existence.</p> <p>The Desert Tortoise Council was not given an opportunity to comment on the route designation process for this area, in spite of written requests to be included in management decisions on desert tortoise habitat.</p>	<p>If only three trend plot surveys are conducted in 1988, we will be back on schedule. We have performed trend analysis on four plots, and by the end of 1987, will have analyzed trends on eight more plots. Our permanent trend plot monitoring program is accomplishing its objectives. Other studies (e.g., effects of raptor predation, amount of shooting of tortoises) have been conducted by the Bureau to more precisely define impacts; additional studies are needed to assess the effects of other conflicting activities.</p> <p>We have added your organization to the mailing list for all documents. If you have suggestions for changes in route designations, they should be presented to the appropriate Resource Area Office for consideration in the next route designation amendment process.</p>

AMENDMENT THREE - MODIFY BOUNDARY OF SALINE VALLEY ACEC

USDI Bureau of Mines	<p>The Hunter Canyon area west of the marsh has mineral resource potential, and incorporation of that area into the ACEC will have an adverse effect on mineral development. Although ACEC status may allow multiple use, mineral exploration-resources or development would likely be subject to severe restrictions not found</p>	<p>ACEC designation allows uses such as mining, access, and recreation but also points out the need for active coordinated protection of natural and cultural resources.</p>
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SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
	on open lands. Additionally, since the area is being considered for withdrawal from mineral entry at some future date, the area would probably be managed in such a way as to not jeopardize its condition.	
Fred Johnson	<p>I am writing this comment on 1986 Plan Amendment Proposal number 3 to inform you and to make notice that the southern proposed extension and the southeastern modified boundary of the Saline Valley ACEC #4 may have future use conflicts with potential minimum operations along the Silver Harvest mineralized zone which is noted as High Potential for mineral resources in the U.S. Geological Survey and Bureau of Mines mineral resource Study of the Inyo Mountains WSA. I suggest that a shift of the southeastern boundaries to the north and northwest by about 1/4 mile will alleviate any potential problem in the future.</p>	<p>The USGS/Bureau of Mines mineral report identifies a silver-lead-zinc area whose low potential overlaps the proposed ACEC boundary by a little less than 80 acres. However, the cultural and wildlife values of this overlap area are very important, and appropriate mitigation measures can be devised to allow mining within the ACEC. ACECs serve miners by alerting them to other known important resource values which need to be considered in mining plans. See also the response to Bureau of Mines comment above.</p>
High Desert Multiple Use Coalition	<p>In Township 14S., Range 38E., Section 9, does not depict the Morning Summer Mill-site, which is adjacent to the Snow Flake Mine. This millsite has been in existence long before the ACEC was established. Also, in Township 14S, Range 38E., Section 10, the artesian well is not shown, nor the road that connects with the road that goes to the Hot Springs. These roads are not</p>	<p>See response to preceding two comments</p> <p>The maps depicting ACEC boundaries are usually drawn on U.S. Geological Survey maps. Features such as mines and roads are not added to the map unless they are relevant to the amendment under study.</p>

SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
	<p>trails and have been in existence since the turn of the century. Also, in the new proposed areas for amendment 3, the area proposed on the southwest end, is an area that is heavily mineralized and is claimed by Dr. Allend Bostwick. To tie up this area with justification of artifacts is false, because the Antiquities Act still takes precedence.</p>	
	<p>In Township 14S, Range 38E, Section 10 and 15, are proposed in the new addition, however, it goes through an area that is used by vehicles, etc., and generally is not consistent with wilderness values.</p>	
R. Mondt	<p>May I suggest that the BLM consider closing the southernmost road that accesses the hot springs. This would add significantly to the viability of the ACEC.</p>	<p>Route closure recommendations should be submitted to the Resource Area as part of the route designation process or as an amendment to the process.</p>
Pacific Gas & Electric Company	<p align="center"><u>AMENDMENT FIVE - MOVE UTILITY CORRIDOR BB TO THE NORTH SIDE OF INTERSTATE 15</u></p> <p>The draft environmental assessment acknowledges on page 4-8 that acceptance of the amendment would place "several constraints on the ability of energy and utility companies to acquire new rights-of-way within Corridor BB." Specifically, a three-mile wide corridor would be restricted to a width of 1/4 to 1/2 mile between Baker and Halloran</p>	<p>We agree that development of facilities within corridor BB would be severely restricted by WSAs 228 and 242, at least until Congressional action on wilderness recommendations. However, this restriction would occur whether or not the amendment is accepted, since it is unlikely new facilities will be allowed within the Scenic Area. The difference would come</p>

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	<p>Spring, for approximately 5 miles. In addition, the assessment states that this width may be inadequate to accommodate utility proposals, particularly with the demand placed on the Boulder Corridor. We have serious concerns about this because although PG and E have no utility facilities in this area, <u>we believe that the proposed amendment would in essence eliminate the corridor concept for Utility Corridor BB.</u> We believe the corridor concept was one of the basic multiple use tenets in the creation of the California Desert Conservation Area Plan as we believe it should be for all public lands.</p>	<p>after Congressional action: under the existing alignment, half the corridor would be unuseable (that part within the Scenic Area), while under the realignment, the entire three mile width could be considered.</p>
	<p>Futhermore, what is equally troublesome is that assessment fails to consider the designation of another utility corridor to relieve the anticipated oversaturation of both the Boulder Corridor and Corridor BB.</p>	<p>Consideration of additional corridors to relieve overuse of corridors D and BB is outside the scope of the amendment. Should you feel an alternative route is available, we suggest you propose it during the annual Desert Plan amendment cycle. There do not appear to be any available routes northwest of the Scenic Area, however. Corridor E (which runs along the eastern boundary of the scenic area) is the route available to avoid oversaturation of corridors D and BB.</p>
Yuma Audubon Society	<p>We agree that utility corridors in the EMNSA are undesirable, however in this case moving the corridor as proposed creates problems. There are two scenarios for the future, both dependent upon Con-</p>	<p>You are correct in indicating that BLM faces a difficult resource trade-off question: should corridor BB cross the Scenic Area or WSAs 228 and 242? The Scenic Area designation will remain, how-</p>

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	<p>gressional action of WSAs 242 and 228. If one or both of the WSAs are designated, and we and think they will be, only a very narrow corridor would be left in the Baker area to accommodate future pipelines, power lines etc. As the corridor quickly fills in there will be a demand for opening additional corridors elsewhere, thus causing a proliferation of corridors. In the alternate scenario, where the WSAs are not designated, powerlines, pipelines, etc., would be allowed to scar these relatively undisturbed areas. In either case, utility facilities would impact and spread onto critical desert tortoise habitat, a cultural resource ACEC, and the shadscale unusual plant assemblage.</p>	<p>ever, while BLM has recommended the two WSAs as unsuitable. Assuming Congress concurs with the BLM recommendation, the realigned corridor will affect neither the Scenic Area nor a unit of the National Wilderness Preservation System. We are quite concerned about locating future facilities in the Scenic Area, since one of the most significant impacts of a utility is visual.</p>
	<p>We think directing utilities and oil companies into a previously disturbed corridor even if it is in the EMNSA, is preferable to either of the above two scenarios.</p>	<p>You are concerned about impacts on other resources. Both tortoise habitat and the shadscale UPA occur on both sides of I-15. Therefore, they would be affected to an equal degree by both the present and proposed corridor alignments. Prior to any development in the Halloran Wash ACEC, a comprehensive cultural survey would be required and a mitigation plan developed.</p>
		<p>Any utility constructed in the corridor will be subject to a full environmental analysis, and stipulations will be developed to mitigate impacts on affected resources. Construction would be guided by ACEC management plan restrictions, and the guidelines of an area's multiple use class. In this regard, and after Congressional action, Hollow Hills WSA would be managed under Class M guidelines, and Soda Mountains WSA under Class L guidelines.</p>
		<p>Concerning corridor overdemand, please see the response to PG&E (above).</p>

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USDI Fish & Wildlife	<p>The existing utility corridor through the East Mohave National Scenic Area already contains a utility line and service road, thereby subjecting the wildlife of the area to the adverse impacts associated with these developments. The Service contends that shifting future transmission lines to another corridor would unnecessarily increase adverse impact to wildlife because additional service roads would be needed to provide access to this new area. As you well know, service roads soon become favorite means of access for off-highway vehicle users, with the impacts of this unintended use often greatly outweighing the effects of the original road construction. Additional utility lines should use the existing corridor. For these reasons, the Services opposes Amendment 5.</p>	<p>Please see response to Yuma Audubon Society (above). Mitigating measures developed through the NEPA process could include co-locating service roads, closing service roads to all but authorized users, or helicopter construction to reduce surface disturbance. Reasonable measures would be included in the right-of-way grant for the project. On-site compliance during construction and follow-up enforcement of public use restrictions would ensure that stipulations are implemented and resource protection is achieved.</p>
General Comment	<p>Continue the protection of Soda Mountains, Hollow Hills, and Halloran Wash by opposing any power transmission corridor development in those portions of the relocated corridor.</p>	<p>Both Soda Mountains and Hollow Hills WSAs will be protected from all forms of development which might impair wilderness values until such time as Congress either releases them from wilderness review or adds them to the National Wilderness Preservation System (NWPS). If released, they will be managed under the guidelines of the multiple use class assigned to them by the Desert Plan. If included in the NWPS, they will be managed under the directives and policy of the Wilderness Act of 1964.</p>

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Desert Tortoise Council	<p>We oppose this amendment because:</p> <p>(1) The existing utility corridor is within the Shadow Valley Crucial/Critical Habitat for the desert tortoise. The BLM is in error on pg. 3-7 in making the statement: The amount of habitat which would be affected by moving the corridor would be approximately the same as that which is now affected south of the Interstate." In fact, the amount of habitat affected would be increased 42 to 50%, because the existing corridor already has some disturbances south of I-15 and the proposed corridor will allow even more to occur north of I-15. The width of the disturbed area then becomes greater than four miles, about 1.25 to 1.5 miles south of the freeway and 3.0 miles north of the freeway.</p> <p>(2) The proposed 4.0-4.5 miles wide utility corridor in the Shadow Valley Crucial habitat has very high potential for cutting the population in half, with no opportunities for genetic mixing. Although the I-15 freeway is now an effective barrier and divides the Shadow Valley population, the impacts</p>	<p>The Halloran Wash ACEC is almost entirely within both the existing and the realigned corridor. Therefore, the amendment would have no effect.</p> <p>Most of the disturbance in the Shadow Valley Habitat Management Area is north of I-15. The two single pole telephone lines located to the south paralleled the freeway at a distance of about one-third mile. The service roads adjacent to each line are in poor condition and are used only on an occasional basis for maintenance. Tortoise habitat conditions on both sides of the highway are nearly identical. We agree that I-15 is an effective barrier and divides the population. However, the realignment will not change this situation. Realignment may change the ultimate location of Raven perch sites, but it is unlikely to result in an increased number of them. Therefore, we disagree with your conclusion and maintain our position that either corridor alignment will result in about the same level of impact.</p> <p>The impacts and concerns you raise are those that will be faced by a proposed utility whether the alignment is within the existing or proposed corridor boundaries. The EIS or EA prepared for that utility is the appropriate place for determining whether additional impacts are</p>

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COMMENTER	COMMENT	RESPONSE
	<p>of I-15 could be mitigated with tortoise-proof fencing and tortoise underpasses. However, the widened utility corridor will have additional roads and many new perch sites for ravens. The potential for population declines from vandalism, collections, and vehicle kills will increase as a result of increased human access. Raven predation pressure is likely to increase with the new perch sites. In summary, this amendment proposes to increase the loss to tortoise habitat, to enhance the potential for population declines, and to fragment the tortoise population to a greater extent than is now the situation.</p>	<p>acceptable, and mitigation would be developed at that time. Mitigation could include co-location of service roads, road closures to all but authorized uses, seasonal use restriction, and fencing.</p>
Desert Tortoise Preservation Committee	<p>We oppose Amendment 2 (Orocopia Mountains) and 5 (Modification of Utility Corridor BB). If these amendments are accepted, tortoise populations and habitat can be expected to decline in the areas under consideration. The types and degree of impacts are not adequately described in the Bureau's document. and rejection would be nearly equal.</p>	<p>See response to Desert Tortoise Council (above). Regarding the adequacy of the document, the California Desert Plan EIS discussed the effects of establishing utility corridors. The amendment would realign one of those corridors slightly. The wildlife impacts of both acceptance</p>
		<p>Specific impacts are not possible, and must await the EISs or EAs prepared for a specific utility proposal. Those documents will present a detailed, site-specific and in-depth analysis.</p>

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<u>COMMENTER</u>	<u>COMMENT</u>	<u>RESPONSE</u>
USDI Bureau of Mines	2. Utility Corridor BB: The proposed relocation infringes on numerous mines, claims, and mineral deposits. Power and utility facilities within the proposed corridor will probably have an adverse impact on the potential for future open-pit mine development or mine waste disposal in that area. Also, the proposed corridor has less desirable terrain as compared with the current corridor. Shifting the Scenic Area (EMNSA) boundary to match the southern edge of the current utility corridor may also alleviate the scenic view problem.	<p>About 82 claims are within the realignment area north of the existing corridor. South of I-15, there are about 439 claims.</p> <p>Impacts on mining operations will be mitigated at the time specific utility development proposals are considered. In this regard, the corridor will not effect any legal rights currently held.</p> <p>BLM's management objective for this portion of the Scenic Area is to maintain scenic vistas from I-15, and not allow visually intrusive developments. Shifting the boundary of the Scenic Area to the south would allow construction of new utilities between I-15 and the Scenic Area. This could create significant visual contrasts south of the highway. Bureau management objectives would be severely compromised. Existing utilities do not create noticeable contrasts.</p>
Ted Rado	Amendment 5: I strongly advocate rejection of this alternative. Information presented in your Draft EA argues against acceptance. The proponent has recommended the change to protect Scenic values in the East Mojave	<p>South of I-15, there are only two above-ground utilities: a pair of single pole telephone lines. They are visible to highway travelers in only a few locations. Their wood pole construction and unmain-</p>

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National Scenic Area (pg 2-3), when the Bureau has stated that the present utility alignment within the EMNSA already contains "existing (transmission line) facilities" subject to continued "maintenance" (pg. 4-7). In fact, the construction of additional lines through this corridor will have a significantly reduced visual impact above the designation and future construction of entirely new transmission towers (with associated access roads for maintenance) in a previously unimpacted corridor, the location of which will still be readily discernable to recreationists utilizing the EMNSA.

tained service roads do not create significant contrasts from this key observation point. In the western half of the corridor, the underground pipelines cross the interstate and move away rapidly. Again, from a highway traveler's perspective, neither the pipelines, the distribution lines, nor the buried telephone cable attract attention. BLM intends that within the Scenic Area the level of visual contrast will be maintained at current levels.

Ted Rado

Utilization of the new transmission line corridor, however, will result in a significantly increased impact to sensitive wildlife species, including the desert tortoise (*Scapaochelys agassizii*). Impacts to wildlife and vegetation will be several-fold higher under the proposed amendment from: (a) construction of access roads for utility maintenance and monitoring vehicles (not required for the existing alignment); and (b) indirect impacts associated with increased vehicle access opportunity resulting from route construction and maintenance. Impacts to the constituent desert tortoise population will extend far beyond the immediate area loss, crushing by vehicles, shooting of tortoises,

Please see response to the Yuma Audubon Society and the Desert Tortoise Council. While we concede that there is potential for increased impacts as the northern edge of the corridor is moved closer to the core tortoise populations of the Shadow Valley Habitat Management Area (6 miles rather than 7.5 miles), the difference is not expected to be significant.

Impacts on the desert tortoise can be mitigated as specific utility rights of way applications are submitted for review. This approach to corridor planning is consistent with current policy for the management of sensitive

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COMMENTER	COMMENT	RESPONSE
Ted Rado	<p>and collection for pets (all well documented through BLM studies, incidentally, for desert tortoise populations where vehicle access is readily available). The Shadow Valley tortoise population is already subject to decline from a variety of man-induced impacts. Since the species is formally designated as "sensitive" by the Bureau and a candidate for Federal listing, acceptance of this amendment strongly contradicts BLM Manual 6840 which stipulates that your agency "...improve the populations and habitats of ...animals which are candidates for listing....".</p>	<p>wildlife species. The designation of a utility corridor in tortoise habitat is not a contradiction with that policy.</p>
Ted Rado	<p>Provide in your Final EA information relating to: (1) the number and type (i.e., steel lattice tower versus wooden pole) of utility lines through the existing tower lines and numbers of existing maintenance roads for these lines; (2) information relating to planned projections for utility line construction along the existing transmission line corridor by the Los Angeles Water and Power company and other utility companies currently available to the BLM; and (3) estimates of visual quality degradation which may result from construction of these planned transmission lines in the existing versus the proposed utility corridors.</p>	<p>Only one new project has been approved for construction within the existing corridor: the Mead/McCullough-Victorville/Adelanto transmission project (a 500kV line to be located north of I-15). No start-up date has been set by the proponent (LADWP). The only other project known to be under study is a fiber optics communication cable. While no specific proposal has been submitted, locations being studied are all north of I-15.</p> <p>No formal visual contrast evaluation has been conducted for the proposed corridor realignment. Visual impacts will depend on the type and number of facilities to be constructed. Generally, visual impacts</p>

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Southern California Edison Company	<p>Southern California Edison Company (Edison) has reviewed the proposed 1986 Amendments to the CDCA Plan. While the majority of the amendments are acceptable, Amendment No. 5, Energy Production and Utility Corridors, has potentially significant adverse impacts on Edison's operations and facilities. We would, therefore oppose the amendment as currently proposed.</p> <p>We would not, however, oppose shifting this portion of Corridor BB north of I-15 if the three mile corridor width is maintained and appropriate revisions are made to the boundaries of Wilderness Study Area Nos. 228 and 242 to insure that this Corridor remains usable. In Edison's opinion, the three mile width is the minimum area necessary to accommodate the future transmission line expansion in this much needed utility corridor.</p>	<p>would be adverse, direct, and long-term. High impacts will occur where visibility is unobstructed and the viewpoint is within one mile or when a strong contrast visually disrupts a unique scenic resource.</p> <p>See response to Pacific Gas and Electric Company.</p>
Citizens for Mohave National Park	<p>We support plan amendment 5. We agree that the DWP powerline corridor should be outside EMNSA (East Mohave National Scenic Area). We recommend that the entire DWP project be located on the existing powerline route,</p>	<p>Thank you for your comment. We note your concerns about the location of the DWP project (the McCullough-Victorville 500kV line); however, approval or disapproval of the transmission line is a separate</p>

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California Native Plant Society	<p>some 10 miles north of I-15. We oppose the DWP powerline route in any part of EMNSA (including the Clark Mountain area). It is inappropriate to designate new transmission or utility corridors in EMNSA.</p>	<p>action, and is outside the scope of this amendment. We also note your concerns about locating new corridors in the Scenic Area. Our goal is to ensure that no new corridors are designated within that area, and that existing corridors are realigned outside of the EMNSA. The management plan for the EMNSA, for example, proposes a realignment of corridor E (which borders the eastern edge of the Scenic Area) a mile to the east, so that it will not infringe on the EMNSA. That realignment may be considered in the 1988 amendment process.</p>
	<p>Amendment Five: Shift the portion of Corridor 38 between Zzyzx and Shadow Mountain to the north of Interstate 15.</p>	<p>Impacts on wildlife and vegetation will be the same, or nearly so, regardless of corridor alignment. Areas north of I-15 are more disturbed than areas south of the freeway.</p>
	<p>Alternative B, REJECT AMENDMENT (no action) is preferred because rejection of the proposal would impact wildlife and vegetation less than if approved. Moving the utility corridor to the north of I-15 would impact vegetation in undisturbed areas.</p>	

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