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NRC South Report for June 2018

Summer wheeling season is well underway as is the summer fire season. Reports across the western states show a number of fires burning and state and federal land management agencies are taking steps to reduce the risk of fire with access restrictions. For starters, agencies are restricting target shooting and the use of fireworks on public lands. Many have added campfire restrictions to the list. In short, before you head for your favorite trails this summer, check with the local land management office to see what restrictions apply.

BLM: Comments have been submitted on the Draft Land Use Plan Amendment (LUPA) and Draft Supplemental Environmental Impact Statement (DSEIS) for the West Mojave Route Network Project (WMRNP) within the West Mojave (WEMO) Planning Area of the California Desert Conservation Area (CDCA).

Overall, the WMRNP planning area covers approximately 9.3 million acres in the western portion of the Mojave Desert in southern California. The WMRNP region is covered by a Draft Supplemental Environmental Impact Statement, which is a Resource Management Plan Amendment to the 1980 California Desert Conservation Area Plan, and as amended by the 2006 West Mojave Plan, and the 2016 Desert Renewable Energy Conservation Plan.

The greater Mojave Desert region of southern California and southern Nevada are the sites of a number of important regional planning efforts. These include regional habitat conservation plans, natural community conservation plans and federal land use plans and amendments. In fact, most of the land surface between Las Vegas, Nevada and San Diego, California lies within the scope of an ecosystem-planning program, five military bases within the Mojave region covered by individual resource management plans.

The BLM is required to designate off-road vehicle routes on public lands as open or closed to motorized vehicle access, or as open on a limited basis. This designation process is a requirement of federal regulation, BLM policy and the BLM's California Desert Conservation Area (CDCA) Plan. Two steps are involved in this process: (1) the designation of routes as open, closed or limited, and (2) amendment of the applicable BLM land use plan (in this case, the CDCA Plan) to incorporate the network of open and limited routes as a component of the Plan.

In reviewing the WMRNP, Cal4Wheel finds Alternative 4 provides acknowledgement of the importance of recreation to the West Mojave (WEMO) region. The WMRNP region is a popular

destination spot for multiple forms of recreation; including but not limited to, four wheel drive touring/driving for pleasure, rockhounding, photography, and wildlife viewing. These are activities that cannot be enjoyed, or replicated, in that diversity in other regions.

Alternative 4 proposes to limit changes to the 2006 WEMO Plan to respond to community-identified enhancements and Court issues, with the least amount of changes to the transportation and travel network. This is not a final agency decision, but instead an indication of the agency's preliminary preference that considers the recommendations of cooperating agencies, the public, and BLM specialists and reflects the best combination of decisions to achieve BLM goals and policies, meet the purpose and need, and address the key planning issues.

Cal4Wheel believes that the loss of access to the West Mojave (WEMO) region for recreation opportunity is a direct loss. There are also indirect impacts that would result should this WMRNP be approved and implemented causing displacement of recreational activities. Those cost include, but not limited to: (1) the increased enforcement required at other sites when displaced recreational users seek out other areas that may be poorly identified as wildlife preserves or other resource-rich areas; (2) the loss of biological resources or habitat at other sites that displaced recreational users may utilize ; (3) the loss of nature education, (4) the loss of outdoor recreation opportunities, (5) the loss of outdoor access and experiences for children in the community; (6) the loss of familial traditions, custom, and culture of recreational and nature-oriented activities in the region; and (7) the loss of the region's history and traditions, specifically with respect to mining and recreational activities.

National Park Service: Comments were submitted on behalf of the California 4 Wheel Drive Association (Cal4Wheel) and its membership directed to the *Saline Valley Warm Springs Draft Management Plan and EIS*.

The Management Plan/EIS has Alternatives in regard to the proposed NPS management of Saline Valley. Alternative 5 is considered by NPS to be the "preferred alternative". Cal4Wheel believes many of the proposed issues in Alternative 5 would have an adverse impact to the unique recreational, social, ethnic-historic and cultural experience of Saline Valley. Cal4Wheel seeks to preserve the unusual degree of magic, freedom and ownership people feel when visiting Saline Valley.

Listing for Historic Preservation - The Historical Section of the Draft Management Plan/EIS notes that: "As of September 2017, consultation with the State Historic Preservation Officer (SHPO), tribes, and the public are ongoing; however, the park is treating the Saline Valley Warm Springs Site as eligible for listing in the NRHP, as previously stated. The historic DOE also recommended that a Cultural Landscape Inventory and possibly a Cultural Landscape Report be prepared for the Saline Valley Warm Springs Historic Site.

Cal4Wheel strongly encourages the NPS to wait until a Cultural Landscape Inventory and Report are prepared, and determination is made about formal status under NRHP, before finalizing the Draft Management Plan/EIS. Many of the components of Alternative 5 specify plans to remove those very features that are core to the cultural experience of what exists today, and upon which such a determination rests.

Feral Burros and Proposed Fencing - Cal4Wheel shares the concerns stated in the Draft Management Plan/EIS about the feral burros. However, we believe that this problem can be successfully done WITHOUT the need for an expensive fence around the entire area.

Cal4Wheel supports artistic fencing around the source pools and settling pond, Alternative 2. Rather than removing the Burro Spring and killing the native mesquite trees, Cal4Wheel would install a heavy screen over the Burro Spring trough, leaving the siphon hose in to water the mesquite. This would effectively keep most water sources away from the burros. Cal4Wheel does not want to put fencing around the tubs themselves as proposed in Alternative 3 as that would take away from the “Saline Experience”.

Additionally, Cal4Wheel feels that fencing the entire area as proposed in Alternative 5, would harm native non-burro wildlife. The fence would also be subject to possible vandalism, not to mention flash flooding, which would leave dangerous fence debris in the environment. This could create a long term hazard if NPS lacked funding to adequately remove and/or maintain the fence. NPS stated during informational meetings, the difficulty of acquiring maintenance funding. The addition of the fences as proposed in Alternative 5 will become a maintenance resource drain.

Cal4Wheel urges the NPS to give a priority to relocating/removing the habituated burros at the Warm Springs. Feral burros elsewhere in Saline Valley are not habituated and avoid humans.

Non Native Vegetation - Cal4Wheel opposes the removal of the lawn and palm trees.

Cal4Wheel agrees the palm trees and lawn are nonnative, but they are NOT invasive as they are confined to the “cared for” location. While the palms may not be native to this area, they are naturalized and are present in desert regions across California, (and in fact are an integral visual aspect of the NPS Furnace Creek Visitor’s Center. The Draft Management Plan / IES (page 81) attempts to compare containing the spread of palm trees to containing the spread of salt cedar (tamarisk). Tamarisks are invasive, and should be removed. Palm trees are containable.

The lawn is a central gathering place for the users of the Warm Springs. It is the heart for socializing, potlucks, sharing road and other safety information, educating new visitors about the warm springs, and other important connections. The lawn provides major benefits and will not spread, because there is no water elsewhere. The lawn and palm trees are clearly part of the ethnic-historic experience of Saline Valley.

Cal4Wheel would propose a program monitoring palm tree development in Saline Valley and would eradicate those trees if they were to be discovered in other parts of Saline Valley.

Cal4Wheel would also apply the same attention to the lawn. Cal4Wheel is not opposed to the removal of the palm trees at what NPS refers to as the upper fenced springs and strongly supports the removal of tamarisk.

Camping Permits - Cal4Wheel is strongly opposed to the proposed requirement of a permit prior to arriving at the Saline Valley. During the NPS Informational meetings it was said there was not a specific permitting plan. There are too many unanswered questions, including: who will enforce this permitting system, who will administer the permits, how to obtain them and do they meet basic cost-benefit analysis.

If a permit system is implemented, Cal4Wheel requests permits be free, easily accessible online, and onsite for the visitors of the Saline Valley that come out and decide to stay or those that plan their vacation around visiting Saline Valley.

Camping Areas - Cal4Wheel strongly supports Camping Areas in Alternative 2, unrestricted dispersed camping areas and strongly opposes designated camping. Currently campers chose sites when they arrive based on site-specific needs, the weather and wind conditions, their particular vehicle type, and accessibility to various amenities such as pools or lawn. Cal4Wheel supports defining camping boundaries, but assigning campsites is not workable.

Cal4Wheel is opposed to the increasing the distance from camping 100 feet to 200 feet from the source springs. Current NPS rule of, "no camping within 100 feet of a source springs" should remain the adopted policy.

Campfires - Cal4Wheel supports the NPS Campfires section, as proposed in Alternative 3 NPS-provided fire enclosures, grates, grills or fire pans. Given a choice of the aforementioned, Cal4Wheel supports non-anchored, heavy NPS fire pits. Additionally, the presence or absence of a provided fire-pit should not be equated to de-facto "designated" camping spots.

Toilet Management - Cal4Wheel supports the Toilet Management section as proposed in Alternative 3 requiring the pumping of vault toilets on an "as needed" basis. Cal4Wheel also highly recommends the addition of another vault toilet at the Palm Springs.

Dishwashing Stations - Cal4Wheel supports dishwashing stations. However, we feel the need for filters to be unnecessary as filters do not address any issues brought up in the management plan. Cal4Wheel supports signage warning visitors the dishwashing water is non-potable. Cal4Wheel will encourage the use of biodegradable dishwashing liquids. Additionally, the presence or absence of a provided dishwashing station should not be equated to de-facto "designated" camping spots.