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# WILDERNESS RECORD

PROCEEDINGS OF THE CALIFORNIA WILDERNESS COALITION

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March-April 1980

No. 2



Freel Peak RARE II Area

Photo by Kathy Blankenship

## Smith River Plan

The State Department of Fish and Game (DFG) is reported to have developed seven controversial alternatives with which to implement the Smith River Management Plan. The plan, whose official release to the public has most recently been delayed by a Del Norte County suit against DFG, considers various means of preserving the pristine character of the Smith and its tributaries, under the State's Wild and Scenic River program.

Much of the controversy surrounding the plan concerns the question of how much of a river's watershed the Wild and Scenic River program is designed to protect. While the Smith "and all its tributaries, from the Oregon-California state boundary to the Pacific Ocean" were slated for inclusion in the plan, the watershed must also be managed "without unreasonably limiting lumbering, grazing, and other uses, when (they)...do not conflict with public use and enjoyment...." The Smith plan contains other similarly contradictory elements, hence the controversy over

the seven proposed alternatives.

None of the seven DFG alternatives considers a majority of the Smith watershed for inclusion in the management plan. The alternative offering the largest part of the tributary system is Alternative III, which would include all major streams in the Smith drainage, approximately 26 percent of the tributary system. By contrast, Alternatives VI and VI-A would exclude 100 percent of the river's tributaries as well as

20 percent (Alternative VI) to 40 percent (Alternative VI-A) of the Smith River itself.

Official release of the plan to the public may be long in coming. Del Norte county contends that DFG did not meet the requirement of "close cooperation" with county and local government in developing the plan, a position consistent with those of timber industry supporters. Resolution of the litigation may prevent the draft plan's release before summer.

## New State Parks

The California State Park and Recreation Commission has scheduled public meetings to nominate a list of projects for funding under Proposition 1 on the June ballot. If the Proposition passes, \$140 million will be available to the State Park System. Natural area preservation may or may not be a high priority for use of these funds, since an increasingly high proportion of State Park funds has been devoted to urban projects

recently.

The public may nominate projects for funding under Proposition 1 at the Board of Supervisors' Chambers, County Administration Building, 700 H St., Sacramento, on Wednesday, April 30, beginning at 9:00 am (other meetings in San Francisco and Santa Ana will have already been held by the time you receive this). For more information, contact William Dillinger at (916) 445-4624.

## Wilderness "Release"

### Foley's Follies

Representative Thomas Foley of Washington, whom we reported in our last issue as introducing an anti-wilderness bill, H.R. 6070, is at it again. H.R. 6607, or "Foley II", contains the same release clause that conservationists objected to in Foley I, but seeks to make release language more acceptable by ratifying all of the Administration's RARE II (Roadless Area Review and Evaluation) wilderness recommendations.

Nationwide, Foley II would designate 12.4 million acres as wilderness, but would also mandate that 36 million be managed "for uses other than wilderness." In California, Foley II would set aside 983,900 acres as wilderness, but would open 2.4 million acres of roadless lands to non-wilderness management.

The release clause in Foley II declares that the Administration's recommended non-wilderness lands "shall, notwithstanding any other provision of law, continue to be managed for uses other than wilderness." Such language distorts the generally sound management policies of the National Forest Management Act. In addition, the right of citizens to appeal future forest plans not considering wilderness as an important multiple-use option would be lost. Thus, while Foley II represents some slight improvements over Foley I, it is also worse in several respects.

#### Areas Affected by Deadlines

Foley II designates only those Administration wilderness proposals in the lower 48 states, but its non-wilderness and further planning provisions apply to the entire National Forest System. One consequence of this distinction would be the loss of 5.6 million acres of roadless lands in Alaska recommended by the Administration for wilderness designation. And since Section 6 of Foley II contains the phrase "notwithstanding any other provision of law," this section would override both an Alaska Lands bill and any other bill that designates wilderness areas or parts of areas which are referenced in Section 6

(River of No Return, Colorado, etc.).

Foley II, like Foley I, would set 1986 as the deadline for Congressional action on RARE II further planning areas. After 1986, all lands formerly recommended for further planning would be managed as non-wilderness. This aspect of Foley's bill would have a significant impact on California roadless areas, since RARE II further planning and non-wilderness recommendations in the state are currently roughly equal in acreage.

Also identical to the earlier bill is Foley II's treatment of primitive areas recommended by the Administration for termination and non-wilderness use. These areas would be managed for non-wilderness uses upon passage of Foley II.

#### Release Language

Foley II uses the same formula as Foley I to release non-wilderness areas; the areas to be released "shall, notwithstanding any other provision of law, be managed...for uses other than wilderness in accordance with the Forest and Rangelands Renewable Resources Planning Act of 1974, as amended." As with Foley I, this language runs roughshod over a number a pertinent laws.

It undermines wilderness as a multiple-use equal in importance to the other multiple-uses specified in the Multiple-Use Sustained Yield Act and in the National Forest Management Act of 1976. It ignores the requirements of the National Environmental Protection Act, which Judge Karlton in *California v. Bergland* (see last issue) found to be woefully neglected by the Forest Service in conducting RARE II. It also denies any procedural relief that might be available through the Administrative Procedures Act.

Foley II's direction that certain Forest Service roadless areas "shall be managed for uses other than wilderness" is at best unclear. If, however, the agency must demonstrate non-wilderness management, it could

place an impossible burden upon Forest Service personnel given historical levels of Congressional funding for the Forest Service. Such funding simply does not allow active management of all the non-wilderness acreage proposed by Foley II, but Foley II could deny Forest Service planners the option of not actively managing certain roadless areas because of their wilderness qualities. Rather, line personnel will have to invent non-wilderness reasons for keeping certain areas in pristine condition - management by indirection.

## \* FLASH \*

Markup of Representative Phillip Burton's Omnibus California wilderness legislation (HR 5578) by the House Interior Public Lands Subcommittee has been postponed until at least April 15.

## \* \* \* \* \*

### Future Wilderness Consideration

Foley II states explicitly something that Rep. Foley claimed was implicit in Foley I. Section 8 of Foley II provides "[a]ny lands to be managed for uses other than wilderness...may again be considered for designation as wilderness..." when the NFMA plans are revised. While this represents an improvement over Foley I, it presents three serious problems.

First, NFMA plans, under the NFMA regulations effective Oct. 17, 1979, are to be revised every ten years regardless of this bill. The initial NFMA plans are scheduled for completion between 1983 and 1985. Thus, revisions of a substantial number of these plans are unlikely to occur until the mid-1990's.

Ten to fifteen years of active non-wilderness management mandated by Foley II may take its toll on currently roadless lands at a much faster rate than existing law. Many of these lands simply will not be eligible for wilderness designation at the time of NFMA plan revision because of the time delay. (cont. on pg. 4)



# Coalition Report

by Archie Douglas

This may be the most important *Wilderness Record* you will receive this year. Hopefully, you now understand the significance of Rep. Thomas Foley's H.R. 6607 ("Foley II"). Passage of Foley II will set an ugly precedent and make the preservation of wilderness lands even more difficult in the future. As if this were not trouble enough, the Bureau of Land Management (BLM) has released a draft California Desert Plan most notable for the degree to which it fails to treat wilderness as an acceptable management option.

The public must respond to these threats NOW. The wilderness designations in Foley II are meager in comparison to the lands it threatens. Regarding the draft Desert Plan, concern-

ed citizens should not be fooled by the BLM's supposedly "Balanced" Alternative. The only alternative that makes any sense at all if the desert is to be treated with the care its fragility calls for is the Protection Alternative. Comment by letter or by phone to the BLM. Let them know what you think of their concept of "balanced" use.

The Coalition's role in all this madness continues to grow, particularly now that The Wilderness Society has cut back on its California activities. While the Society continues to help us in Washington, the job of organizing statewide support and getting the issues to Washington is now unquestionably more difficult.

Now is the time for the Coalition's members to real-

ly go to work. We need to increase our energy, our interest, and our numbers. With our CETA grant about to expire and with the Desert Plan and Foley II requiring such great effort, the Coalition stands at a crucial crossroads. In the coming months, we will have to depend on each other to apply a great deal of pressure in the appropriate places. From Davis, we will do what we can to get even more complete information out to members, but we can only do so much from our offices. Tell your friends about the Coalition, about the Desert Plan, about Foley II. The more people we can alert and involve, the more wilderness we can save. It's that simple.

# Forest Planning Update

## Sierra Forest Plan

Sierra National Forest is ahead of most other California national forests in the process of compiling its forest plan. On February 15 the Forest released a list of "decision criteria" to be used in choosing a Forest Plan from among the various alternatives that will be developed. Alternative forest management strategies are already being prepared.

After evaluation of alternatives and identification of a preferred alternative, a draft environmental statement will be released for public comment and review. This may be ready by as soon as August, 1980.

Public comments are

solicited on the decision criteria - no deadline is stated. To comment or to receive copies of the decision criteria, write to Sierra National Forest, Federal Building, 1130 "O" St., Room 3017, Fresno, CA 93721.

## Forest Planning Clearinghouse

A new publication, *Forest Planning*, has been created by the National Forest Planning Clearinghouse, a project of Cascade Holistic Economics Consultants (CHEC). The clearinghouse was formed at the request of citizens groups, including the National Wildlife Fed-

eration, Sierra Club and Natural Resources Defense Council.

In addition to *Forest Planning* magazine, the clearinghouse will provide a resource file of research and publications related to forestry, a speaker's bureau and workshop assistance services. By July, when the resource file will have been completed, any person may request a complete list of publications related to any aspect of forestry for a \$1 fee.

To maintain a national perspective of forest planning issues, CHEC has assembled a Clearinghouse Advisory Committee consisting of agency personnel, scientists and representatives of both the public and industry.

*Forestry Planning* magazine will include regular departments, such as an "access" section describing recent research and publications relating to forestry and forest planning, regular updates on BLM and Forest Service planning nationwide, and a readers' forum. A one year subscription to the monthly magazine is available at a cost of \$4.80 to individuals. The rate for institutions is \$10. Special multiple-subscription rates are available for non-profit organizations.

The first three issues of *Forest Planning* will be free to anyone upon request. Make checks payable to CHEC and mail to: National Forest Planning Clearinghouse, Subscription Dept., P.O. Box 3479, Eugene, OR 97403.

# Desert Power Projects

The March 1980 *Energy Report* of the Riverside District Office, Bureau of Land Management, described ten proposed energy projects that could be sited in or traverse the California Desert. More information on specific projects, which are listed below, can be obtained from the Riverside District Office, BLM, 1695 Spruce St., Riverside, CA 92507, or by calling Bill Collins at (714) 787-1355.

**California Coal Project** - This proposal by Southern California Edison would involve a 1500 megawatt

plant to begin operation during 1988-1990, located near either Boron, Cadiz Dry Lake, Ivanpah Lake, Rice Airfield, or Ormond Beach (Ventura County). No environmental reports have been prepared as of yet concerning air quality degradation and other impacts.

**California Department of Resources Coal Project** - A 1000 megawatt coal-burning facility to be located near El Mirage Dry Lake, Troy Dry Lake or Buttonwillow.

**East Mesa Geothermal Lease Proposal** - Several units have been leased to

Southern California Edison and construction of geothermal power generating plants is proposed. The East Mesa area, west of the Imperial Sand Hills, was rejected from Wilderness Study Area status despite support for wilderness study by conservationists. The area is heavily vegetated with unusually dense creosote and provides important wildlife habitat.

**North Salton Sea and Yuha Geothermal Lease Proposals** - Geothermal study areas include lands within and near the Salton Sea and over 100 square

miles of the Yuha Desert. A Yuha Geothermal Proposed Final EAR was released February 29, 1980. The Yuha Desert, another rejected Wilderness Study Area, consists of an extremely colorful "badlands" topography with many archaeological sites, including intaglios.

**Intermountain Power Project, Palo Verde Nuclear Powerplant Project, Allen-Warner Valley Project** - Proposed plants to be located in Utah, Arizona, and Utah/Nevada, respectively, these projects would impact the California Desert

with transmission corridors leading to urban southern California.

**Lucerne Valley Peaking Station** - Proposed by Southern California Edison for a maximum of 1500 hours operation per year, this 1290 megawatt fossil-fuel plant would be located in upper Johnson Valley. Construction is proposed to start in June, 1982.

**Randsberg Geothermal Lease Proposal** - Environmental analysis is already prepared for geothermal leases to be offered north and east of Randsberg, in northwestern San Bernardino County.

## Alternative to BLM Mismanagement?

# Desert National Parks

Desert conservationists have proposed the establishment of a new national park and expansion of two existing national monuments in California to provide responsible management and use of some of the finest wild areas now administered by the Bureau of Land Management (BLM).

The momentum for this transfer of jurisdiction of public lands from the BLM to the National Park Service will depend on large part upon how the regions are treated in the final California Desert Plan. If the final Plan resembles the "Balanced" Alternative of the draft Plan, National Park status will almost certainly be sought.

The longest-standing proposal is one for "Mojave National Park." This park would be situated in the east Mojave region of California

(often referred to as the "gem" of the California desert), between two interstate freeways. Highly accessible to a large population, the park would provide protective use of the outstanding resources of the area.

Another long-contemplated proposal concerns expansion of Death Valley National Monument to include Eureka Dunes, the Saline Range and Valley, the east slope of the Inyo Mountains, the Panamint Range, the Owlshed Mountains, Pyramid Peak, and the Greenwater Range.

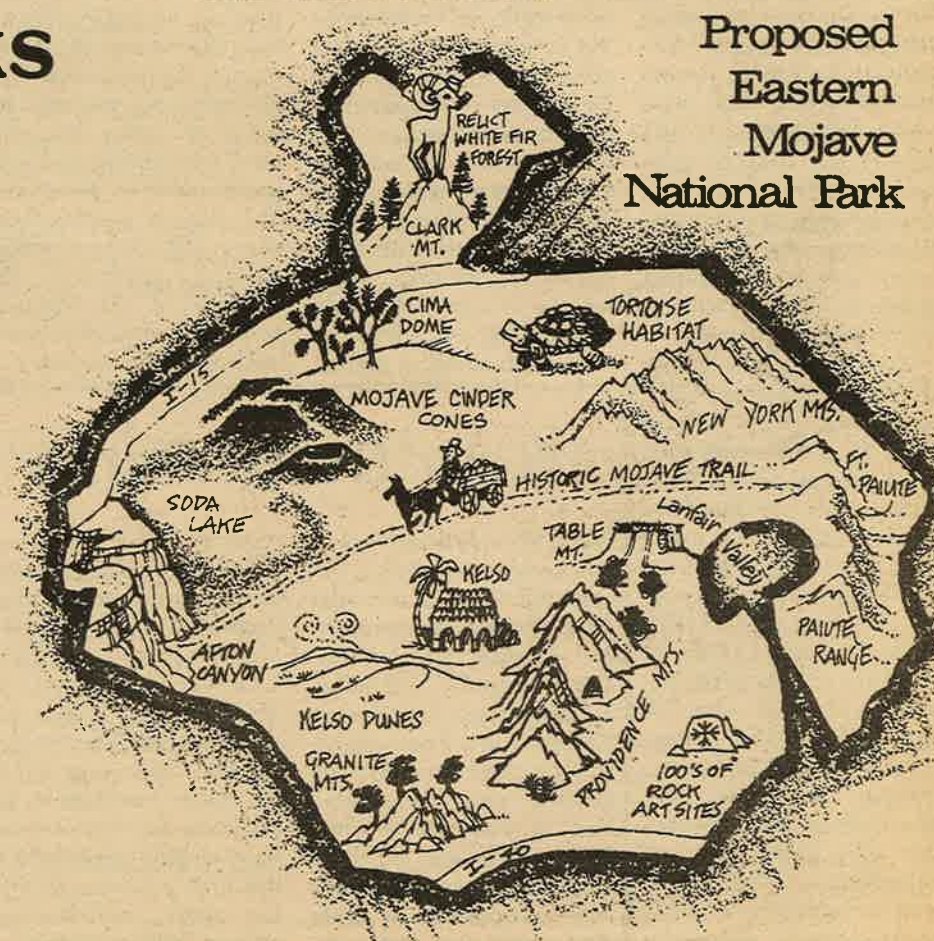
The newest park expansion proposal is the addition of a "Cahuilla" Unit to Joshua Tree National Monument. Encompassing the Chuckwalla Mountain, Mecca Hills, Orocopia Mountains, and Palo Verde Mountains, the unit would

protect some of the finest Sonoran desert ecosystem in California as well as prime habitat for desert bighorn, desert tortoise, and a wide diversity of other animals and plants. The Cahuilla Unit would also include the best location for reintroduction of pronghorn antelope to the California desert.

A "subalternative" of the Protection Alternative, Recreation Element of the draft Desert Plan concerns "studied" of an East Mojave National Park, along with parts of the above conservationist proposals. BLM should be asked to support national park status for these proposals in acknowledgement of its inability to provide "protection use" management of these fragile and outstanding areas.

Called the "crown jewels" of the California Desert, and located between two major Interstate highways, the eastern Mojave is situated to offer enjoyment of its outstanding natural values to millions under careful National Park Service management.

## Proposed Eastern Mojave National Park





# Wilderness Non-Wildlife BURROS

by Dennis Coules

The controversy over management of free-roaming, introduced burros and horses is rife with emotionalism but has a simple solution: total elimination of these exotic beasts wherever conflicts with natural resources arise. Of course, said elimination should be accomplished by the most humane means possible. Where live-trapping is impractical or cannot accomplish total removal, shooting may be the only solution.

The burro, a native of North Africa, was brought to the Southwest by Spanish explorers in the 16th century. Most existing herds today are descendants of burros used by mineral prospectors.

There are no effective natural predators of burros in the southwest, and the animals' destruction of native vegetation and wildlife habitat is indisputable. Although the BLM began a modest program of burro and horse removal and adoption on the public lands of the California desert in 1975, populations have increased from 5500 at that time to 9550 at the time the draft Desert Plan was written. Wild horses number about 750 of these and are not nearly as great a problem as burros at this time.

Damage to vegetation has grown in proportion with the burro population. Near springs and other water sources vegetation may be trampled to the point of total destruction. At current population levels, even the open rangeland is being partially denuded. Rare and endangered plants are affected by a decrease in reproductive potential when overgrazed by burros.

Competition with native wildlife is the most alarming impact of feral burros. Most smaller wildlife species suffer reduced populations in areas where burro use is heavy, due to removal of

vegetation for food and cover as well as trampling and compaction of soil.

Burros are much more aggressive than bighorn sheep and exclude bighorn herds from waterholes. Burros also foul water sources to the extent that they are not available to bighorn and directly compete for forage. Bighorn populations are declining throughout the desert and may not survive to the end of the century. In many regions the introduced burro may be the primary cause of this tragic loss. For example, a huge burro herd of 800 animals in the Saline Valley and on the Inyo Mountains' east slope has reduced the Inyo bighorn herd to a critical level from which it may not recover.

All action alternatives of the draft California Desert Plan propose to reduce present burro populations by about half, which the BLM considers to be the carrying capacity of the range. This is not enough. If any burros are allowed to remain in the California desert, they should be restricted to a very few areas of low resource sensitivity. They must be totally removed from all other areas and securely enclosed in their preserves so that none can escape to repopulate regions of removal. Anything less than total removal will require periodic round-ups and continue the controversy endlessly.

The draft Desert Plan treats burros in a manner opposite that of all other human consumptive uses of the desert. The Protection Alternative proposes to maintain more burros than does the Use Alternative. Protection of burros does not mean protection of desert resources. However, the difference in alternatives is hardly significant, since the extra forage obtained from burro removal in the Use Alternative is allocated to domestic

livestock, not to wildlife.

Previous attempts to remove burros from the Grand Canyon and from Death Valley have been stalled by lawsuits and other tactics of a few so-called "humane" groups while the burros continue to overpopulate areas and destroy wildlife and other resources. These groups have apparently decided that human sentimental values are more important than the survival of unique species of wild animals and plants.

Perhaps if these groups could be persuaded to consider the needs of the lifeforms that are not quite as "cute" as escaped domestic pets they would join with other conservationists in demanding the management necessary to preserve the health of the total desert ecosystem.



*Disputed Water Rights*

Graphic by Stan de Treville

## Endangered Species Ignored

The U.S. Fish and Wildlife Service has withdrawn proposals to list 1,876 plants and animals as Endangered or Threatened. The withdrawal is in response to the 1978 Endangered Species Act Amendments, which require the Service to officially withdraw all outstanding listing proposals not finalized within two years of their first publication in the *Federal Register*.

Interior Department spokesman Inez Conner cited lack of personnel to assimilate data as a major reason for the withdrawals. Up to 300 person-days per species are required to complete the entire process of proposing to list a species for protection, holding hearings and public meetings on it, soliciting and answering comments regarding the listing, and writing final regulations. Complicating the situation

is another new rule requiring that the critical habitat for a species be identified at the time that the species is considered for listing and that an economic impact analysis of the critical habitat listing be undertaken.

Critics point out that the Department of the Interior has yet to hire economists to do the analyses, nor have all the regulations necessary to carry out changes in the law been published. A scientist in the Office of Endangered Species expressed the view that a lot more could and should have been done. "We just have not gotten ourselves together to deal with the 1978 amendments," he said, charging that the office had been paralyzed by "incompetence and ineptitude" of administrators who were "afraid to take the bull by the horns because they worried what

would happen politically to the Endangered Species Act. We have been so busy saving the Act that we are not saving plants and animals."

Meanwhile, the 1,876 de facto endangered plants and animals will receive no listing and no critical habitat

protection. The Office of Endangered Species is now hiring economists, critical habitat specialists and additional biologists. It is reported that more than 200 species may be proposed for protection during 1980, and "as many as possible" listed.

## Mecca Hills Plan

The Bureau of Land Management has released a Revised Draft Mecca Hills Recreation Management Plan and Environmental Assessment open to public comment until April 21. This plan is intended to be consistent with the overall Desert Plan's goals and objectives and to form the basis for site specific implementation.

Recommendations of the Revised Draft Plan include splitting the planning area into roughly equal portions - the eastern half available for vehicle use on designated roads and trails, the western half closed to vehicular use except for a campground access road. Other aspects include increased enforcement personnel, information kiosks, and a study of the feasibility of restoring areas impacted by off-road vehicle use. A campground is proposed for Box Canyon.

The Revised Draft Plan does not address the issue of wilderness designation for

Areas. These are number 343 (Mecca Hills) and number 344 (eastern Mecca Hills/Orocopia Mountains). Support for wilderness designation for both areas is quite extensive, as the areas contain scenic, cultural, geologic and biologic values.

The Mecca Hills are extremely colorful and deeply eroded, with narrow, steep-walled canyons - all in all, it is a classic badlands labyrinth. The southeastern Mecca Hills in area 344 contain Hilder Springs, heavily utilized by Nelson bighorn sheep, a species whose numbers are declining in California and which is adversely impacted by off-road vehicle recreation. Archaeological evidence indicates human occupation of the Mecca Hills from 900-1600 A.D.

Comments will be accepted on the Revised Draft Plan by addressing Indio Resource Area, BLM, 3623-H101 Canyon Crest Drive, Riverside, CA 92507. The deadline is April 21.

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### PURPOSES OF THE CALIFORNIA WILDERNESS COALITION

... to promote throughout the State of California the preservation of wild lands as legally designated wilderness areas by carrying on an educational program concerning the value of wilderness and how it may best be preserved in the public interest by making and encouraging scientific studies concerning wilderness, and by enlisting public interest and cooperation in protecting existing or



## News Briefs

### No Porkbarrel Reform

In early February, the House of Representatives passed a massive water projects bill authorizing construction of 180 projects throughout the country, at a cost of \$4.3 billion. Known as the Omnibus Water Resources Development Act (H.R. 4788), the bill was opposed by a coalition of environmental and taxpayer groups. Despite their efforts, it passed by a large margin, 283-127. H.R. 4788 almost totally ignores President Carter's water policy reform recommendations. In addition, an amendment to delete eight of the bill's worst projects, introduced by Rep. Bob Edgar (D-Pa.), was defeated. Presidential veto of the bill is a possibility if major reforms are not made as the legislation is considered by the Senate.

### Congress Approves Channel Islands Park

Congress has passed legislation establishing a Channel Islands National Marine Park, covering more than 100,000 acres. The

legislation, introduced by Senator Alan Cranston and Rep. Robert Lagomarsino (R-Santa Barbara), protects the five major islands in California's Santa Barbara Channel. It has been signed by President Carter.

Senator Cranston led a successful floor fight against an amendment by Senator S.I. Hayakawa to exclude Santa Rosa Island from the Park. The Park Service is directed to manage the Channel Islands as an area of low-intensity use in order to protect fragile populations of marine mammals and birds.

### Klamath Dam Proposal

Pacific Power and Light Co. has applied for a permit to begin construction studies for a 120-foot high earthen dam on the Klamath River, just north of the California-Oregon border. The proposal is for a 330-foot long diversion dam to channel water into a four mile canal to generate hydroelectric power. Two other hydroelectric sites on the Klamath are also proposed.

## Foley, cont. from pg. 1

cause they will no longer meet the criteria of the Wilderness Act. For these lands, the reconsideration in Section 8 will be meaningless.

Second, Section 8 leaves reconsideration of roadless lands for wilderness designation upon NFMA plan revision entirely to the discretion of Forest Service planners. The bill provides that these lands may be considered for designation as wilderness when plans are revised. Current NFMA regulations state: "roadless areas will be evaluated and considered for recommendation as potential wilderness areas... (Sec. 219.12(e)). Foley II represents a considerable weakening over the status quo.

Finally, there is a fundamental contradiction between the provision of Section 8 of Foley II which allows reconsideration of non-wilderness roadless areas for wilderness designation at some future date, and the provision of Sections 6 and 7 that these non-wilderness lands must be managed for uses other than wilderness. Thus, on the face of the bill, while non-wilderness roadless

areas still eligible for wilderness designation in ten or fifteen years can be considered for such designation at that time, the Forest Service is without

authority to manage them so as to preserve their wilderness characteristics, or at least to do so directly.

The odd consequence of Section 8 of Foley II is that it would allow the Forest Service to consider certain areas for recommendation for wilderness designation while, were the Forest Service to actively manage these areas as wilderness

pending Congressional action on its recommendations, anti-wilderness interests could sue on the theory that such management violates the mandatory non-wilderness management provisions of Foley II.

**Trent Orr**

**Natural Resource  
Defense Council**

## CWC Member Groups

Member groups of the California Wilderness Coalition provide information on local wilderness issues and help to educate their members about important statewide issues. We gratefully acknowledge their support and their willingness to struggle together with CWC for our common goal of protecting California's wildlands.

### American Alpine Club

c/o R.D. Caughron  
2 Delmar Avenue  
Berkeley, CA 94708

### Bay Chapter Sierra Club

6014 College Avenue  
Oakland, CA 94618

### California Native Plant Society

c/o Dr. John Sawyer, Pres.  
2731 Greenbriar Lane  
Arcata, CA 95521

### Citizens to Save Our Public Lands

P.O. Box 1471  
Willits, CA 95490

### Citizens for East Mojave National Park

1129 Elizabeth Street  
Barstow, CA 92311

### Desert Protective Council

3750 El Canto Drive  
Spring Valley, CA 92077

### Earth Ecology Club

300 Moraga Road  
Moraga, CA 94556

### Ecology Center of So. Calif.

P.O. Box 35473  
Los Angeles, CA 90035

### Friends of the Earth

124 Spear Street  
San Francisco, CA 94111

### Friends of the River

401 San Miguel Way  
Sacramento, CA 95819

### Friends of the River

**Foundation**  
Building C, Fort Mason  
Center  
San Francisco, CA 94123

### Golden Gate Env. Law Society

536 Mission Street  
San Francisco, CA 94105

### Granite Chief Task Force

P.O. Box 212  
Homewood, CA 95718

### Greenpeace

Building 240, Fort Mason Ctr.  
San Francisco, CA 94123

### Hot Springs Protection Society

1107 Ninth Street, No. 1020  
Sacramento, CA 95814

### Ishi Task Force, Northstate Wilderness Committee, and Butte Environmental Council

708 Cherry Street  
Chico, CA 95926

### Island Foundation

Route 1, Box 448  
Covelo, CA 95428

### Kern Plateau Association

P.O. Box 858  
Kernville, CA 93238

### Knapsack Section

**Bay Chapter Sierra Club**  
1434 Jones Street  
San Francisco, CA 94109

### Lake Tahoe Audubon Society

Box 1105  
South Lake Tahoe, CA 95705

### Loma Prieta Chapter Sierra Club

2253 Park Blvd.  
Palo Alto, CA 94306

### Mt. Shasta Audubon Society

P.O. Box 530  
Mt. Shasta, CA 96067

### NCRCC Sierra Club

6014 College Ave.  
Oakland, CA 94618  
(c/o Mark Palmer)

### Northcoast Environmental Center

1091 H Street  
Arcata, CA 95521

### Northeast Californians for Wilderness

P.O. Box 391  
Susanville, CA 96130

### The Red Mountain Association

P.O. Box 86  
Leggett, CA 95455

### Salmon Trollers Marketing Association

P.O. Box 137  
Fort Bragg, CA 95437

### San Joaquin Institute for Environmental Action

P.O. Box 143  
Springville, CA 93265

### Sinkyone Council

Box 242  
Whitethorn, CA 95489

### Siskiyou Mountain Resource Council

P.O. Box 4376  
Arcata, CA 95521

### Sonoma County Ecology Center

P.O. Box 704  
Cotati, CA 94928

### South Fork Fish and Game

P.O. Box 951  
Weldon, CA 93283

### South Fork Trinity Watershed Association

P.O. Box 198  
Hyampom, CA 96041

### South Fork Watershed Assn.

P.O. Box 749  
Porterville, CA 93258

### Trinity Alps Group

P.O. Box 146  
Junction City, CA 96048

### The Wilderness Group of Mendocino County

P.O. Box 557  
Mendocino, CA 95460

### The Wilderness Society

P.O. Box 891  
Davis, CA 95616

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**Wilderness Press**  
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Berkeley, CA 94704  
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**Mammoth Maintenance Service**  
P.O. Box 155  
Mammoth Lakes, CA 93546  
(714) 934-8616

**The Naturalist**  
219 E Street  
Davis, CA 95616  
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**Ski Hut**  
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Berkeley, CA 94704

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1831 Terrace Place  
Delano, CA 93215

**Antelope Camping Equipment Mfg. Co.**  
21740 Granada Ave.  
Cupertino, CA 95014  
(408) 253-1913

**Solano Ski Sport**  
1215 Tabor Ave.  
Fairfield, CA 94533  
(707) 422-1705

**New World Outfitters**  
1055 Market St.  
San Francisco, CA 94103

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P.O. Box 403  
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**The Alpine Supply Co.**  
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San Francisco, CA 94108  
(415) 362-8477

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**San Francisco Travel Service**  
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San Francisco, CA 94111  
(415) 991-6640

**Daybell Nursery & Florist**  
55 N.E. Street  
Porterville, CA 93257

**Ace Family Hardware**  
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Lihue, Hawaii 96766

**The North Face**  
1234 Fifth Street  
Berkeley, CA 94710

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☐ Yes I wish to become a member of the California Wilderness Coalition. Enclosed is \$ for first-year membership dues.

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ANNUAL DUES:  
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# California Desert Plan

On February 15 the draft California Desert Plan was released by the Bureau of Land Management (BLM). This Plan will guide the management of the California Desert - one-fourth of California - well into the 21st century. Conservationists have charged that the draft Plan is heavily weighted towards development and consumptive uses. Citizens wishing to express their views have until May 15 to contact the BLM by letter, phone or at public hearings to be held around the state.

The California Desert Plan was mandated by the Federal Land Policy and Management Act of 1976, which requires that the plan follow the principles of multiple-use and sustained yield in providing resource use and the maintenance of environmental quality. The legislation acknowledged that "the California desert environment is a total ecosystem that is extremely fragile, easily scarred...slowly healed...and seriously threatened." The "California Desert Conservation Area," subject of the Plan, comprises 25.6 million acres, 12.1 million of which are managed by BLM.

cont. on pg. S-4



Castle Peaks in East Mojave

Photo by Jim Eaton

## Wilderness Needs Support

### Critical Areas Neglected

The purpose of the Bureau of Land Management's (BLM) Areas of Critical Environmental Concern (ACEC) program is to protect historic, cultural, and scenic values, fish and wildlife resources and other natural systems or processes, by designating areas that will receive special protective management to preserve these values on a continuing basis.

There had been some hope among scientists and conservationists that ACEC designations in the California Desert Plan would provide a viable means of protecting fragile desert resources, particularly areas which would not receive

protection as designated wilderness.

However, after the Desert Plan Staff resource specialists painstakingly identified between 202 and 240 of these critical areas, BLM managers actually writing the Desert Plan rejected 115 without specific explanation and consolidated 87 to form only 50 ACEC for inclusion in the draft Desert Plan. Many of the included areas were slashed in acreage. All of this was reportedly accomplished during a 48-hour session with no input from resource staff. The 50 areas are identical in all three of the action alternatives.

cont. on pg. S-2

A major omission of the draft California Desert Plan is the failure to disclose how different Wilderness Study Areas (WSAs) were rated as suitable or non-suitable for wilderness designation. For the 138 WSAs comprising 5.7 million acres of the California Desert Conservation Area (CDCA), the only information provided in the Plan is a rating of "outstanding," "good," "fair," or "poor" for each area. No explanation is given for how these ratings were derived nor how individual areas were recommended as suitable or non-suitable under each of the three Desert Plan action alternatives.

Only those areas recommended as suitable for wilderness in the final Desert Plan will be submitted to Congress as proposed wilderness legislation. The amount of wilderness recommended varies by alternative: 5.2 million acres in the Pro-

tection Alternative, 1.8 million acres in the "Balanced" Alternative, and 600,000 acres in the Use Alternative (see Table 1). The Protection Alternative does not even include all the WSA acreage, and the Balanced and Use Alternatives are heavily weighted against wilderness.

Conservationists have urged the Bureau of Land Management (BLM) to remove the Wilderness Element from the simplistic and use-oriented Plan alternatives and to evaluate Wilderness Study Areas separately but concurrently with formulation of the Desert Plan. Full disclosure of decisions must be provided to the public, including site-specific analyses. A desert-wide wilderness system should be developed to include a full spectrum of ecosystems, landforms, plant communities, wild-life habitats, and other characteristics of the desert.

Conservationists have also pointed out that the reduction of Areas of Critical Environmental Concern (ACEC) from over 200 to only 50 (see related article this issue) creates a vacuum in the protection of many critical areas and resources that can only be filled by wilderness designation.

#### High Priority Areas

During the public comment period that extends until May 15 (see "How to Comment"), the BLM will accept comments on specific Wilderness Study Areas, as well as more general comments on the draft Desert Plan and draft Environmental Impact Statement.

Following are some of the more controversial areas in need of support for wilderness designation (BLM has not yet named these areas, identifying them only by number). In the Protection Alternative nearly all of these areas that are presently Wilderness Study Areas would be recommended for wilderness designation; in the "Balanced" Alternative only tiny portions of a few areas would be protected.

**Cadiz Valley/Iron Mts. (WSA 305)** - The eastern half of this huge 300,000 acre area was not even included in the Wilderness Study Area, despite a glaring lack of justification. The area contains a prime example of an immense and remote desert valley, but not even the WSA would be recommended for wilderness designation in the "Balanced" Alternative. BLM prefers to keep part of the area open to intensive use, including off-road vehicle (ORV) racing.

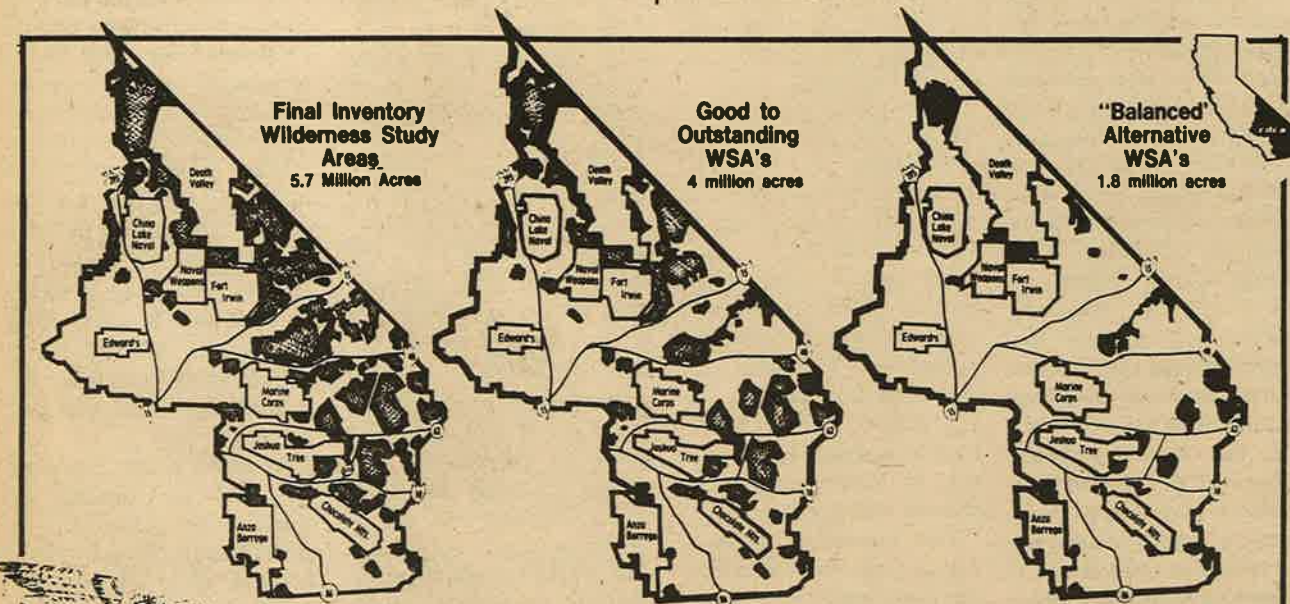
**Algodones Dunes (WSA 360, 362)** - The most extensive and complete

dune system in California, these WSAs are also in need of expanded boundaries and support for wilderness designation. Highly coveted by off-road vehicle enthusiasts, the area contains numerous rare and endangered plant and animal species, as well as excellent wildlife habitat. The portion of 362 near Glamis is very disturbed as a result of ORV use but the WSA boundaries of 362 should be extended to the north and south. Those of 360 should be extended to the north.

**Chemehuevi Valley/Wash (WSA 294, 307; Roadless Areas 309, 309A)** - Wilderness preservation for WSAs 294, 309, 209A, and the northeastern portion of 307 would protect the second-largest desert wash in the CDCA. Heavily vegetated with ironwood, palo verde, catclaw acacia, etc., the wash is used extensively by migrant birds and other wildlife. Chemehuevi Valley contains a major population of desert tortoise; this may be one of only two stable populations in the United States. None of these areas would be recommended for wilderness designation in the BLM's "Balanced" Alternative. Areas 209, 209A and the northeastern portion of 307 were not even included in Wilderness Study Areas. Areas 294 plus 307 and 309 plus 309A could be combined and considered as two "wilderness complexes" to allow planning on an ecosystem basis.

**West Panamint Canyons (WSAs 136, 137, 137A)** - Jail Canyon, Hall Canyon, Surprise Canyon, Happy Canyon and Pleasant Canyon all feature riparian vegetation, with perennial streams in three of the canyons. Abundant wildlife is found in

cont. on pg. S-3



Reprinted from March 1980 Perspective

#### VANISHING WILDERNESS

Only 31% of the total wilderness study acreage is recommended in the "Balanced" Plan alternative, and the Use alternative recommends only 9%, thereby skewing two out of three Plan alternatives heavily toward the non-wilderness end of the spectrum. There are no intermediate alternatives in the range of the 72% BLM rated as "outstanding" and "good," or even nearer 50% as one would expect. The consistent failure to provide a full range of real alternatives is a fundamental, and perhaps fatal, flaw of the draft Desert Plan.



# Wildlife Spurned

The continued existence of many wildlife species in the California desert is questionable under all three action alternatives offered in the draft California Desert Plan.

The Draft Environmental Impact State (EIS) accompanying the Plan warns that even if the Protection Alternative is implemented, seven officially listed rare and endangered species would continue to be adversely impacted, and habitat for 12 proposed sensitive species such as desert bighorn, golden eagle, and desert tortoise would be damaged.

Under the Balanced Alternative, which is closer to a BLM "preferred" alternative, eight listed species would be adversely impacted, leading to "extirpations in some cases and possible extinctions in others." Extirpation of the

desert tortoise is predicted in three of the four major "crucial habitat areas." In addition, 13 proposed sensitive species would be severely affected to the point of requiring official listing. These include the desert bighorn, Amargosa pupfish, Nevada speckled dace, flat-tailed horned lizard, and Amargosa vole. Of 70 identified special habitat area, 71.4% would receive negative or severe negative impacts under the Balanced Alternative.

Adoption of the Use Alternative as the final California Desert Plan would bring about the extirpation of many desert species.

## Desert Wildlife is varied

The California Desert Conservation Area (CDCA), subject of the California Desert Plan, contains more than 100 habitats, including representatives of Great

Basin, Mojave and Sonoran Desert types. Many transitional areas, or ecotones, exist where the desert intergrades into the Sierra Nevada, Central Valley, Lower California, or Pacific regions. The native wildlife fauna includes 419 species of birds, 94 mammals, 64 reptiles, 16 amphibians, 42 fish, and thousands of invertebrates. Many species are endemic to the California desert or have a major portion of their range there.

## Planning Approach

The Wildlife Element of the Desert Plan employs 5 basic management tools: Wilderness Management Plans in wilderness areas, ACEC Management Prescriptions in "Areas of Critical Environmental Concern," Habitat Management Plan (HMP) for specific habitat areas, Road Designation Restriction (RDR) in Multiple Use Class L areas, and Special Attention Designations (SA) to highlight species or habitats during environmental assessments of proposed actions or projects.

Active management tools are considered to be appropriate only in Class C and L areas and may not be utilized in Class M or

I. Thus, Class M or I areas that contain critical habitat will not be subject to Habitat Management Plans if conflict with more consumptive uses arise.

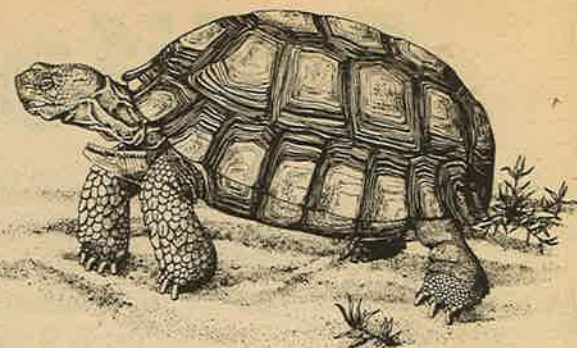
## Effects of Alternatives

The Protection Alternative would have the most beneficial effects on wildlife among the alternatives offered in the draft Desert Plan, despite residual negative impacts to many species. Habitat Management Plans would cover 3.6 million acres, and wilderness areas would have a highly beneficial impact through preservation of habitats and restrictions on consumptive uses.

Proposals under the Protection Alternative include reintroduction of pronghorn and California bighorn onto historical ranges.

The Balanced Alternative would have negative impacts overall, according to the draft EIS. Habitat Management Plans would include 2 million acres; the number of proposed wilderness areas would be reduced to 15% of the CDCA public lands.

Highly negative impacts are expected in the large percentage (41%) of CDCA lands allocated in



Classes M and I (see Table I). These areas will not be subject to active wildlife management and will be subject to highly negative impacts from incompatible uses.

The Use Alternative would leave only 22% of the CDCA in Classes C and L, where positive management actions could occur. Habitat Management Plans would include only 669,000 acres and proposed wilderness areas would cover only 4.6% of CDCA public lands.

## Improvements Needed

Several improvements in the Protection Alternative could reduce the residual negative impacts that have been predicted. Possibilities include: (1) consolidation of public holdings in all low elevation areas containing desert tortoise habitat with elimination of ORV use and prohibition or restriction of grazing and development; (2) humane elimination or reduction of feral burro populations throughout the desert, and restriction of the spread of other exotic

species, including plants; (3) adoption of the subalternative of "Reduced Grazing to Optimize Wildlife Protection" or the "No Grazing Subalternative"; (4) elimination of ORV use off of designated roads and trails in all Multiple Use Classes; (5) Prohibition of yucca harvesting, chaining or any other vegetation type-conversions; (6) Elimination of plans to dispose of public lands along the Salton Sea of value to brown pelican, southern bald eagle and Aleutian Canada goose; and (7) management of all special habitat areas and important habitats of endangered, rare or sensitive species as Areas of Critical Environmental Concern (ACEC) if not incorporated in other specific protective classifications.

## Environment Degraded

Air quality, water resources and soils will be impaired under all of the Desert Plan alternatives according to the draft Environmental Impact Statement. The Energy/Utility Element provides for construction and operation of major power plants (coal and geothermal) in each alternative.

Hydrogen sulfide emissions from geothermal plants and sulfur dioxide/nitrogen oxide emissions from coal-fired plants will impair visual quality. Off-road vehicle (ORV) open areas will contribute to dust pollution, the problem becoming most serious under the Use Alternative. Air quality degradation from mining activity will also be most serious under the Use Alternative.

Power plants and some

mineral extraction facilities pose the greatest problems for water resources. Power plants are major water users and desert groundwater sources are inadequate to meet the predicted need.

Generally, impacts to soils will be greatest under the Use Alternative, decreasing in severity under the Balanced and Protection Alternatives. Almost all activities occurring in the desert impact soils but the greatest difference between alternatives involves ORV use. Four times as much acreage of sensitive soils will be located in off-road vehicle open areas under the Balanced Alternative in comparison with the Protection Alternative and 16 times as much acreage will be impacted if the Use Alternative is implemented.

## Public Opinion

Between 1975 and 1978 the Bureau of Land Management (BLM) commissioned polls by Gallup, Field and Stanford Research Institute (SRI) to assess public attitudes on the use of the California desert. The Gallup Poll surveyed nationwide opinions, the Field Poll surveyed statewide, and SRI polled desert residents.

In all surveys, protection of desert scenery, wildlife and ecology, and historical

and archaeological areas was the highest priority of those surveyed. Public opinion opposed mining and commercial development and particularly opposed off-road vehicle use.

This strong public consensus for protection of the desert was apparently ignored when BLM developed the Plan Alternatives. The Protection Alternative is displayed as an extreme position while the "Bal-



anced" Alternative, which protects very little, is exhibited as the reasonable compromise. The alternatives are also worded to give the impression that protection does not include use, as if "protective use" (the public preference) is not a possibility.

## Critical Areas cont.

Of the 115 rejected areas, 27 were primarily for wildlife, 61 for cultural values, 3 for geology, 15 for vegetation, and 9 others were not even listed in the Plan appendices.

The Federal Land Policy Management Act (FLPMA - which also mandated the California Desert Plan and BLM wilderness review) states that ACEC designation shall be given "priority" in "the development and revision of land use plans" and the protection of ACECs shall be given "priority" in applying the required management attention (Section 202 [c] [3]).

Furthermore, several of the rejected ACEC were proposed to protect federally listed endangered or threatened species. Rejection of these ACEC and failure to protect said species is in direct violation of the Endangered Species Act, which states in (Section 7[b]) that "Each Federal agency shall... [carry out] programs for the conservation of endangered species and threatened species listed pursuant to section 4." Rejected ACEC for listed species habitat include the Desert Slender Salamander. No ACEC are provided for several other federally listed species nor a long list of proposed endangered, threatened, or rare species of animals and plants.

A strong public demand for full accounting of reasons for rejection of specific areas is warranted. Most or all of the rejected ACEC should be reinstated and successful ACEC restored to their original size. A list of the rejected areas is found in the Plan Appendices and can be requested from BLM; or can be obtained from the

## Archaeology Compromised

If the draft Desert Plan's Balanced alternative were to be implemented as a final Desert Plan, cultural and Native American resources would be severely impacted.

The draft EIS of the Plan flatly predicts that "the majority of cultural/Native American resources occurring within Classes M and I will be adversely affected and possibly destroyed during the twenty-year management period of the California Desert Plan."

In the Balanced Alternative, 42% of the land base would be allocated to these Classes M and I ("Moderate and Intensive Use Classes"). Under the Protection Alternative cultural resources would have a much better outlook for continued existence, although destruction would be assured on at least 6% of the land base.

tural resource sites have been recorded; it has been estimated that as many as 100,000 may exist.

Among the most interesting cultural artifacts are petroglyphs, or designs scraped onto rocks. Many of these patterns date back to 3,000 or 7,000 B.C.

Petroglyphs have been subject to vandalism and theft throughout the desert. Access to the sites for vandals is facilitated by the availability of most of the California desert to off-road vehicle (ORV) use under present management.

Two important archaeological regions that would be particularly devastated under the Balanced Alternative are the Mule Mountains/Palo Verde Mountains and the Panamint Dunes and Valley.

The Mule and Palo Verde Mountains are very high

in the desert's wetter days. Petroglyphs, pottery sites and intaglios (giant forms scraped on the desert surface) are concentrated here.

The Panamint Dunes, Valley and Dry Lake contain especially ancient archaeological sites. Yet Panamint Dunes would be open to ORV use as an "Intensive Use" (Class I) area. The dry lake would be a *de facto* open area because it occurs in a Class M area under the Balanced Alternative.

The provision for ORV open areas and ORV use on "existing ways" constitutes the greatest single threat to cultural resources under each of the Desert Plan's alternatives. Unless ORV use is restricted to carefully-selected designated roads and trails in all Multiple Use Classes (zones of the Desert Plan), much of our cultural



Petroglyph names are meant as no more than convenient labels.



# ORV Mismanagement

The Bureau of Land Management's (BLM) California Desert Plan will perpetuate off-road vehicle (ORV) management techniques that have already "sacrificed" 2 to 3 million acres. The concept of "open areas" - where vehicle use is allowed anywhere in the area - is included as a part of the Desert Plan in the Intensive Use Class. The unenforceable definition of "existing ways" would apply to all areas in the Moderate Use Class, which would allow, in effect, random and uncontrolled vehicle use.

In 1972, the BLM produced an "Interim Critical Management Plan" (ICMP). Four categories of ORV use were created: open, existing roads and trails, desig-

nated roads and trails, and closed to ORVs.

Perpetuation of the "open area" concept in the Desert Plan's Intensive Use Class is a direct violation of President Carter's Executive Order 11989, which states that whenever ORVs are causing, or will cause considerable adverse effects on soil, vegetation, wildlife or cultural or historic resources, "the respective agency head shall...immediately close such areas." There is no question that such serious damage has occurred after 8 years of ICMP management.

The Desert Plan will also perpetuate the unenforceable definition of "existing roads, trails and ways." An "existing way" can be any

track which shows evidence of prior vehicle travel and was recorded as being in existence on or before December 31, 1977. This definition has proven both unworkable and unenforceable because even the vaguest of vehicle tracks can be interpreted by a driver as an "existing way." Random vehicle use is the result.

Vehicle use on existing roads and ways will be allowed in both the Intensive and Moderate Multiple Use Classes, covering 74.5% of the California Desert Conservation Area (CDCA) under the Use Alternative, 39.1% under the Balanced Alternative and 5.8% under the Protection Alternative. Even Class L, the "Limited Multiple Use Class," which

is to be zoned for vehicle use on designated roads and trails, will be open to vehicle use on existing roads and ways for up to seven years until the designations are completed. This will "contribute to proliferation of new existing roads and ways and increase the difficulty of enforcement," according to the Desert Plan's Draft EIS. Under the Balanced Alternative, 82.5% of the CDCA will be open to this random, uncontrolled vehicle use for up to seven years.

Furthermore, "sand dunes, dry lake beds, and washes not specifically designated as open or closed will be considered open to motorized vehicle use if they occur within open areas or existing road and way

zones." Thus, "existing roads and ways" means "open area" in these particularly fragile areas. Dunes and washes are among the most important and sensitive wildlife and rare plant habitat areas in the desert, while dry lake beds are often the site of archaeological zones, frequently disturbed by ORV use.

Under the Protection Alternative, 48% of the CDCA will be available for vehicle use on designated roads and trails. Roads identified during the wilderness inventory process will also be open to motorized vehicles in proposed wilderness areas until completion of Wilderness Management Plans for each area. These plans will be finished in the first two years

following adoption of the California Desert Plan.

Conservationists have long advocated restriction of ORV use in the desert to designated roads and trails where adverse impacts can be minimized. One alternative to the Desert Plan's present approach to vehicle management would be to establish the road system identified during the Final Wilderness Inventory as the desert's designated transportation system. These inventoried roads were identified after several periods of public comment and include all desert roads which serve legitimate purposes. Designation or closure of other routes could take place after Plan adoption with environmental analysis and public participation.

## Wilderness cont. from pg. S-1

addition to rare plants and varied life zones ascending up the canyons. The Panamint Range is a concentration area for prairie falcon and other raptors. It also contains the largest remaining desert bighorn herd in California.

**East Sierra Slopes (WSAs 157, 158, 159, 160, 163)** - These WSAs form a highly diverse region with a unique mixing of Sierra Nevada and Mojave Desert influences. Grapevine, Short and Sage Canyons support riparian vegetation. A large number of raptor nesting sites are also present. Many Sierran wildlife species are at the eastern extreme of their range here, and Mojave species find their western limits here, causing a high degree of variation and intergradation. Due to these areas' popularity with off-road vehicle enthusiasts, all are classified as "non-wilderness" in the Balanced Alternative.

**Amargosa Gorge/Chicago Valley/Kingston Valley/Mountains (WSA 222)** - This huge and extremely diverse 255,000 acre WSA contains the above critical habitat areas as well as the Shadow Mts., Dumont Hills, Silurian Hills, Valjean Valley, and Dumont Sand Dunes. Yet in the Balanced Alternative only a portion of the Kingston Range would be recommended for wilderness designation. The area's vegetation ranges from creosote and other low desert shrubs to Joshua trees, yucca, barrel and cholla cactus in the higher valleys, pinyon-juniper forest on the steep mountainsides, and a relic white fir forest at the highest elevations of the Kingston Mountains. Amargosa Gorge contains permanent water, supporting the Amargosa pupfish, speckled dace, Amargosa toad (if any still survive), and numerous birds and mammals attracted to the canyon, its water and its riparian vegetation.

**Lone Tree Canyon (WSA 184)** - Located along the east

Mojave, this WSA is situated at the junction of the Mojave Desert, Sierra Nevada, San Joaquin Valley, and transverse ranges. It is the southernmost canyon of the Jawbone-Butterbread-Dove Spring-Lone Tree Canyon complex. The entire canyon complex has been heavily impacted by off-road vehicles, including total denudation of vegetation in parts of Jawbone and Dove Spring. Opposition to wilderness by ORV groups is no doubt the reason that this WSA was recommended as "not suitable" for wilderness designation, even in the Protection Alternative.

**Lava Mountains/Golden Valley (WSA 170)** - This WSA contains the Lava Mts., with their deep, scenic canyons, and Golden Valley, which offers perhaps the best wildflower display in the California Desert. Although slated for wilderness protection even in the Balanced Alternative, the area immediately to the north of the WSA is proposed for intensive use, including ORV competition. The potential for conflicts and illegal transgressions onto the wilderness area is great.

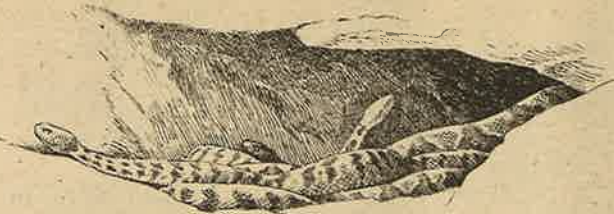
**East Mojave (numerous WSAs)** - Considered by many the "gem" of the Mojave Desert, this region contains such outstanding WSAs as Clark Mt. (227), the Providence Mts. (263), the Woods-Hackberry Mts. (271), the New York Mts. (266), Cima Dome (237, 237A, 237B, 238A-B), the Granite Mts. (256), and the Kelso Dunes (250). Conservationists believe that creation of a Mojave National Park would result in the best management of this outstanding region, should the BLM refuse to protect it adequately (see related article).

**Chuckwalla Mountains (WSA 348), Little Chuckwalla Mountains (WSA 350)**

The Chuckwalla Bench, an area of bajadas and washes between the Chuckwalla and Chocolate Mts. that is partially included in WSA 348, is unequalled as an

Plant and wildlife diversity is extremely high with many rare species present. The last pronghorn antelope in the California desert lived on the Chuckwalla Bench until exterminated by the military during World War II. The area is a prime candidate for pronghorn reintroduction.

**"Checkerboard" Areas:** WSAs 341 (Santa Mts.), 344 (Orocopia Mts.), 355 Picacho/Midway Mts.), 218 (East San Bernardino Mts.); Roadless Areas 336 and 339A (Little San Bernardino Mts.), 340 Haystack Mt.) - All of these areas, some of which are the finest potential wilderness areas in the desert, have one thing in common. All are comprised



## Rare Plants Become Rarer

A major criticism of the draft California Desert Plan is that no Vegetation Element was prepared among the "Plan Elements." Instead, vegetation was dealt with as a subheading under the Grazing Element. Its existence was evaluated only in relation to this particular use.

Due to this omission of vegetative planning, the only specific management

provisions for botanical resources in the Plan are a few Areas of Critical Environmental Concern (ACEC) dedicated to rare and endangered plants. However, at least 15 other ACEC that had been proposed specifically for vegetative resource protection by BLM resource specialists were eliminated by BLM management when deciding which ACEC to

include in the Desert Plan.

Table 2 indicates the number of rare plant locations and unique plant assemblages that would be damaged under each of the Plan alternatives. Of course, impacts would be least negative under the Protection Alternative, but significant nevertheless.

Off-road vehicles and feral burros are particularly damaging to desert vege-

tation. Off-road vehicles have totally denuded thousands of acres under BLM "management" and damaged vegetation on several million acres.

Domestic livestock are particularly destructive to riparian vegetation and near water sources, but can also cause long-term changes in vegetative pattern over large regions.



Desert plantlife - Mojave

Photo by Jim Eaton

Table 2 SIGNIFICANT IMPACTS ON RT&ES AND UPAS BY ALTERNATIVE				
Key Issues	No Action	Protection	Balanced	Use
Total numbers of Rare, Threatened, or Endangered plant localities which could be impacted.	188-263	154	188	263
Total numbers of unique plant assemblages which	82-118	67	82	118

### REJECTED ACEC's FOR VEGETATION AND RARE PLANTS:

Big Sandy Springs, Last Chance Mts., Cerro Gordo Peak, Greenwater Range, Death Valley Junction, Red Rock Canyon, Kramer Junction, Lane Mts. Daggett, Soggy Lake, East Ord Mts., Cushanberry Grade, Chuckwalla Valley,



## DESERT PLAN

cont. from pg. S-1

The draft Desert Plan proposes to divide the desert into a patchwork of four zones called "Multiple Use Classes." These are (1) Controlled (Class C) - lands to be recommended to Congress for wilderness designation; (2) Limited (Class L) - designed to protect sensitive resources with low-intensity uses, including motorized vehicle use on designated roads and trails; (3) Moderate (Class M) - a wide variety of consumptive uses including utilities and vehicle use on "existing roads, trails, and ways" - which usually translates into random off-road vehicle use; (4) Intensive (Class I) - for intensive use and commodity production, including off-road vehicle cross-country competition in some areas.

## Plan Alternatives

The draft Plan offers four alternatives: No Action,

Use, Balanced, and Protection. The major difference between Plan alternatives is the proportion of land allocated to each of the above "Multiple Use Classes" (except for the No Action alternative, which exists for comparison with the present situation and makes no allocations). These allocations are shown in Table 1. For example, the Protection Alternative allocates 5,221,000 acres to Class C (recommended wilderness), the Balanced Alternative allocates 1,828,000 acres to this class, and the Use Alternative offers only 602,000 acres.

Allocations to other Multiple Use Classes also vary, with the percentage of lands allocated to the moderate and intensive use classes highest in the Use Alternative.

A comparison of the allocations to Class C illustrates that the Balanced Alternative is not

really "balanced" - only 15% of the California Desert Conservation Area BLM holdings are recommended for wilderness designation in the Balanced Alternative.

Although the Bureau claims to have no preferred planning alternative, officials admit that they will develop a proposed plan (to be released September 30) using the Balanced Alternative as a point of departure.

## Plan Elements

The second major component of the Plan is a series of nine "Plan Elements." These will provide specific management guidelines for resources and uses within the Multiple Use Classes. Again, the Plan Elements are "use"-oriented rather than "resource value"-oriented. Only three elements - wilderness, wildlife, and cultural/Native American values - deal directly with

existing resources.

Other Plan elements are motorized vehicle access, mineral exploration and development, recreation, livestock grazing and wild horses/burros, energy production/utility corridors, and land tenure adjustment. Vegetation, one of the basic resources of the desert environment, is not designated as an element of the Plan.

## Environmental Impacts

A draft environmental impact statement accompanies the draft Desert Plan. The Use and Balanced Alternatives show negative to highly negative impacts to air quality, soil, vegetation, wilderness, and wildlife. The Use Alternative also shows highly negative impacts to cultural and scenic resources. Details are found in articles throughout this issue.

Table 1

Multiple-Use Class Designations Under Four Alternative Plans Acreage and Percentage (millions of acres)								
Class	No-Action Alternative		Protection Alternative		Balanced Alternative		Use Alternative	
	Acres	Percent	Acres	Percent	Acres	Percent	Acres	Percent
C			5.22	43%	1.83	15%	.60	5%
L	4.41	36%	5.94	49%	5.26	43%	2.07	17%
M	6.51	54%	.55	5%	4.33	36%	7.47	62%
I	.94	8%	.14	1%	.42	4%	1.69	14%
None	.28	2%	.28	2%	.30	2%	.30	2%
C-Controlled Use(wilderness) ; L-Limited Use; M-Moderate Use; I-Intensive Use								

C-Controlled Use(wilderness); L-Limited Use; M-Moderate Use; I-Intensive Use

## Summary of Improvements Needed

The following major improvements are needed in the California Desert Plan if the Plan is to provide proper management of the fragile resources of the California desert. The *Protection Alternative* is the best alternative offered, but the problems outlined below need correction even under the protection option. The Balanced and Use Alternatives respond neither to public preference for resource protection nor to the legislation which mandated the development of a Desert Plan (FLPMA, Section 601). For information on how to express your views, see "How to Comment."

1. **WILDERNESS** - The Plan should disclose how different Wilderness Study Areas were rated as suitable or non-suitable for wilderness designation. A much more thorough analysis should be made of wilderness options. Individual areas of importance should be supported for wilderness designation in your comments.

2. **MULTIPLE-USE CLASSES** - Classes I and M do not allow active management of resources. They only allow for mitigation of damage that is planned or that has already occurred. Active management should be allowed in all Classes. Desert zoning should be based on natural boundaries and ecological units, and adequate buffer zones of limited use should surround all wilderness proposals. Different levels of use-intensity should not be mixed in individual ecological units.

3. **OFF-ROAD VEHICLES (ORVs)** - The designation of Class I areas as totally open to ORV use is illegal and must be eliminated. The concept of vehicle use on "existing roads, trails and ways" is unenforceable and should be discarded. ORV use in Class M and L areas should be allowed only on designated roads and trails, using the final Wilderness Inventory map's road system as a guide to designations. ORVs should not be permitted on sand dunes or desert washes under any Class.

4. **CRITICAL AREAS (ACEC)** - All of the 240 ACEC

originally proposed by BLM resource specialists should be designated as ACEC, with only slight modifications after public review. Top priority should be given to the protection and management of these areas, as required by law (FLPMA, Sec. 202 [c] [3]).

5. **PLAN ELEMENTS** - A Vegetation Element should be developed that bases use of vegetation on its limitations and sensitivity to these uses. Rare or endangered plants and unique plant assemblages should be given special management attention in this element.

6. **BURROS AND LIVESTOCK** - Introduced wild burros should be totally eliminated from the desert or maintained in only a few enclosed areas of low resource sensitivity. No new livestock grazing allotments should be established, and present allotments should be reduced to levels consistent with protection of wildlife and vegetation. The "Reduced Grazing to Optimize Wildlife Protection" subalternative to the Protection Alternative should be supported.

7. **PARKS** - The BLM should support National Park status for the East Mojave area, as well as expansions of Death Valley and Joshua Tree National Monuments, as outlined in the article on national parks. These areas should not be managed under BLM's present system of "multiple abuse," but should be managed for "protective use."

8. **LAND EXCHANGES** - The BLM should pursue an aggressive program of land acquisition and exchange to consolidate public ownership in proposed wilderness areas, critical wildlife habitat and other significant resource areas. Conversely, lands containing these values should not be disposed of in exchanges.

9. **IMPLEMENTATION** - A Desert Planning Staff should be retained at a central location to guide future management decisions and to interpret, analyze and utilize the massive amount of data collected during the

inventory phase of the Desert Plan. A centralized, desert-wide staff of resource specialists should be permanently established in the California Desert Conservation Area and given review authority over resource decisions made by BLM management. A plan is useless without proper implementation!

## How to Comment

1. Write letters to the BLM to express your views on the California Desert Plan. Suggestions for comments are found in many articles in this issue and are summarized in "Summary of Improvements Needed."

## Address:

BLM-Desert Plan  
P.O. Box 5555  
Riverside, CA 92517

2. For answers to specific questions or to request a copy of the Plan, call the BLM's toll-free (in California) number, 8 a.m. - 4

p.m. weekdays: 1-(800)442-4946. The BLM will also accept oral comments at this number.

3. Attend the public hearings scheduled at 12 locations in California (see list). All hearings extend from 3 p.m. to 8 p.m. Your attendance can have a great influence on the shape of the final Desert Plan. Statements can be as brief or as long as you desire.

4. For more ideas on how to help, write to California Wilderness Coalition, P.O. Box 429, Davis, CA 95616, or call (916) 758-0380 between 9 a.m. and 5 p.m. on weekdays.

SUMMARY USES ALLOWED IN MULTIPLE USE CLASSES										
MULTIPLE-USE CLASS		PURPOSE OF THE CLASS	MAJOR LAND USES							
			LIVESTOCK GRAZING	MINING	ELECTRIC GENERATING PLANTS	UTILITY TRANS- MISSION	RECREATION	MOTORIZED VEHICLE ON ROADS AND TRAILS	MOTORIZED VEHICLE OFF ROADS AND TRAILS	EDUCATION RESEARCH
X -- ALLOWED		Use is allowed with special conditions which protect sensitive resources and insure compatibility with the intent and purpose of the multiple use class.								
A -- ALLOWED WITH CONDITIONS										
D -- WHERE DESIGNATED ONLY										
NA -- NOT ALLOWED										
C - Controlled		Areas recommended for wilderness in which motorized vehicle travel will be prohibited if designated as wilderness by Congress. Mineral exploration and development are allowed but closely controlled, pursuant to the Wilderness Act of 1964. Transmission facilities for electricity, gas, water, and tele communications are not allowed.	A	A	NA	NA	A	A	NA	A
L - Limited		Designed to protect sensitive natural, scenic, ecological and cultural resources, but in which provision is made for generally low intensity, carefully controlled multiple use of resources. Motorized travel is limited to designated roads and trails.	A	A	NA	A	A	A	NA	A
M - Moderate		Containing typical or common natural, scenic or ecological resources, with provision for a wide variety of present and future uses, including mining, grazing, recreation, and utilities. Management programs would conserve desert resources and mitigate damage to resources caused by allowed uses. Motorized travel is allowed on existing roads, trails, and ways.	X	X	A	A	X	X	NA	X
I - Intensive		Areas which are or have been in intensive use, or which present unique opportunities for concentrated dominant uses. This is an active management class which provides for intensive use and commodity production and does not generally contain sensitive natural or cultural values. Motorized vehicle use is allowed on existing roads, trails, and ways, and may be allowed off road in designated areas.	X	X	X	X	X	X	D	X

SAN DIEGO ①  
Thursday, April 17  
S.D. Veterans Memorial Bldg.  
Park Blvd and Zoo Drive  
Balboa Park

EL CENTRO ④  
Monday, May 5  
Imperial Irrigation District  
Auditorium  
1285 Broadway

SACRAMENTO ②  
Tuesday, April 22  
Sutter-Placer Room  
Sacramento Community Center  
14th and K Streets

BISHOP ⑥  
Monday, May 5  
City Council Chambers  
377 W. Line Street

OAKLAND ③  
Wednesday, April 23  
Kaiser Center - Auditorium  
300 Lakeside Drive

BLTYHE ⑦  
Tuesday, May 6  
Ruth Brown School  
Auditorium  
241 N. 7th Street

LOS ANGELES ④  
Wednesday, April 30  
Board of Supervisors  
Hearing Room  
500 W. Temple

RIDGECREST ⑦  
Tuesday, May 6  
Burroughs High School  
Multi-Use Room  
Burroughs Access Road

PALM SPRINGS ⑤  
Thursday, May 1  
International Hotel  
International Room  
1800 S. Palm Canyon Drive

BARSTOW ③  
Wednesday, May 7  
City Council Chambers  
220 E. Mountain View Street

SAN BERNARDINO ⑤  
Thursday, May 1  
San Bernardino Convention Center  
303 N. E Street

NEEDLES ⑧  
Wednesday, May 7  
City Council Chambers  
1111 Bailey