



County of  
INYO

## PLANNING COMMISSION

Drawer L • INDEPENDENCE • CALIFORNIA 93526 • (714) 878-2411 (Ext. 318)

April 28, 1980

TO: Board of Supervisors  
FROM: Planning Commission  
RE: Recommended County of Inyo Response to the California  
Desert Conservation Area Plan

On April 23, 1980, the Planning Commission reviewed the Planning Department Staff Report on the California Desert Conservation Area Plan. A motion was made as follows:

"Moved by Commissioner Jarvis, seconded by Commissioner Dinsmore, that the Planning Commission approve the Planning Department Staff Report on the Draft California Desert Conservation Plan (Agenda Item #18) and forward it to the Board of Supervisors with a commendation to the Staff on the job done on this item along with a request that this document be circulated to every department, area agency and individuals interested in this matter."

All pertinent information including recommendations is in the enclosed attachments.

Sincerely,

A handwritten signature in cursive script that reads "Ted Hilton".

Ted Hilton  
Planning Director

TH:GB:d1m

Attachments: Planning Department Staff Report  
Draft Resolution

BOARD OF SUPERVISORS RESOLUTION NO. 80-57

A RESOLUTION ON THE DRAFT CALIFORNIA DESERT  
CONSERVATION AREA PLAN ALTERNATIVES AND EIS.

WHEREAS, the Federal Land Policy and Management Act of 1976 requires the preparation and completion of a comprehensive long-range plan for the management, use, development and protection of the Public Lands within the California Desert Conservation Area; (CDCA) and

WHEREAS, the Wilderness Act of 1964 set the criteria for determining the roadless areas of Public Lands; and

WHEREAS, Federal Court has ordered BLM to prepare a series of regional Environmental Impact Statements for all grazing management plans rather than a national one; and

WHEREAS, the Inyo County portions of CDCA (area) has been used extensively for mining, recreation, and livestock grazing which are three main industries of Inyo County; and

WHEREAS, a maintained county road system serves most of the area; and

WHEREAS, the private property in the area constitutes important County tax base; and

WHEREAS, the Protection Alternative will severely impact the County of Inyo (see attached Exhibit A); and

WHEREAS, the Balanced Alternative will severely impact the County of Inyo (see attached Exhibit A); and

WHEREAS, the Use Alternative has the least impact to the County of Inyo; and

NOW, THEREFORE, BE IT RESOLVED that the Inyo County Board of Supervisors do hereby oppose the PROTECTION ALTERNATIVE OF THE CALIFORNIA DESERT PLAN.

BE IT FURTHER RESOLVED that the Inyo County Board of Supervisors do hereby oppose the BALANCED ALTERNATIVE OF THE CALIFORNIA DESERT PLAN.

BE IT FURTHER RESOLVED that the Inyo County Board of Supervisors support the USE ALTERNATIVE OF THE CALIFORNIA DESERT PLAN subject to the impacts and recommendations stated in Exhibits A and B.

BE IT FURTHER RESOLVED that the Inyo County Board of Supervisors do hereby oppose ALL ALTERNATIVES OF THE LAND TENURE ADJUSTMENT ELEMENT.

BE IT FURTHER RESOLVED that the Inyo County Board of Supervisors oppose the elimination of County tax base in the CDCA without compensation; and

BE IT FURTHER RESOLVED that the Inyo County Board of Supervisors seek the continuation of intergovernmental cooperation and coordination between BLM and County of Inyo.

BE IT FURTHER RESOLVED that copies of this resoltuion be sent to Senator's Cranston and Hayakawa, Congressmen Thomas, Secretary of the Interior Address, National Director Gregg and California State Director Ruch.

PASSED AND ADOPTED this                      day of                      , 1980.

ATTEST: \_\_\_\_\_  
Clerk

\_\_\_\_\_  
Vernon "Johnny" Johnson  
Chairman

EXHIBIT A IMPACT OF CDCA PLANS ON INYO COUNTY

GENERAL IMPACTS OF PROTECTION, BALANCED AND USE ALTERNATIVES:

1. The potential of solar and wind energy installations may be prohibited on potential sites. Further study is suggested by Staff.
2. The prohibitions regarding access of motorized vehicles in Classes "C" and "L" can severely impact mining, grazing, recreation, religion, and scientific study.
3. The Wild horse and Burro Element has certain management areas that can impact adversely rare, endangered and sensitive plants and animals, range ecosystems, live-stock economy, game populations such as major wintering deer herds, upland game, and in some cases are in conflict with National Park Service and China Lake Naval Weapons Center Policies.
4. The Energy Production Utility Corridors Element portrays the the future siting of 46% of the potential power plant sites in Mexico rather than California. We question the investment and placement of power plants for domestic consumption in a foreign country.
5. Some proposed policies could deny the beneficial use of water in many localities where construction of recharge basins, dikes, etc. would be prohibited.
6. There is no policy addressing hazards that present a risk to humans, such as abandoned concentrations of mining shafts on public lands.

PROTECTION ALTERNATIVE IMPACTS

1. The "C" and "L" land classifications cover more than 99% of the area (within Inyo County). These combined classifications cover an area about 25% larger than Death Valley National Monument (inside Inyo County's borders).  
  
The "M" and "I" classifications cover less than 1% of the area.
2. Mining will be prohibited except for existing valid rights which may be allowed, in 86% of the polygons or portions of them.
3. Mining of uranium or other industrial radioactive minerals are prohibited in 90% of the polygons or portions of them, except for valid rights which may be allowed.
4. Geothermal energy exploration and production is prohibited.

5. Policies regarding grazing in wilderness areas could result in elimination of livestock use on 86% of the polygons having public range capable of livestock grazing (primarily because of access, fencing and water).
6. Agricultural other than grazing is prohibited.
7. The Protection Alternative through the Land Tenure Adjustment Element plans to acquire private property. This plan could result in a loss of 25% to 30% of the total private property in Inyo County. Also as much as 170,000 acres of State school lands could be lost through the State trading those lands for federal holdings outside of Inyo County.

#### BALANCED ALTERNATIVE IMPACTS

1. The combined "C" and "L" classifications still cover about 80% of the area of approximately the size of Death Valley National Monument.  
  
The combined M & I classifications make up only about 20% of the area. The I classification is only about 1% of the area.
2. Mining will be prohibited except for existing valid rights which may be allowed, in 31% of the polygons or portions of them.
3. Mining of uranium or other industrial radioactive minerals will be prohibited in 33% of the polygons or portions of them, except for valid rights which may be allowed.
4. Geothermal Energy exploration and production will be allowed in five potential areas and prohibited in eight areas or portions of areas.
5. Policies regarding grazing in wilderness areas could result in the elimination of livestock use on 24% of the polygons having public range capable of livestock grazing (primarily because of access, fencing and water).
6. Agriculture other than grazing will be prohibited in seven areas and permitted in three areas on suitable lands.
7. The Land Tenure Adjustment Element could result in a loss of possibly 25% of the total private property in Inyo County and possibly as much as 150,000 acres of State owned land.

USE ALTERNATIVE IMPACTS

1. The combined "C" and "L" classifications still amounts to the equivalent area equal to about 75% of Death Valley National Monument.

The M & I classifications have been expanded to about 50% of the area.

2. Mining will be prohibited except for existing valid rights on 19% of portions of polygons.
3. Uranium mining not impacted; the only deposit affected in Inyo County is located at Eureka Sand Dunes, this area is already closed to mining.
4. Geothermal energy and production is prohibited within polygon 42. Geothermal production is permitted elsewhere except on steep sloping mountainous areas.
5. Grazing is not impacted.
6. Agriculture is only prohibited in polygon 42.
7. Land Tenure Adjustment Element could result in the acquisition of private property generally limited to patented mining claims. There could be as much as 30,000 to 35,000 acres of State land which would be acquired by BLM.

EXHIBIT B COUNTY OF INYO RECOMMENDATIONS FOR USE ALTERNATIVE

- POLYGON #1-Eliminate Class "L" in favor of Class "M".
- POLYGON #2-No recommendations to be added.
- POLYGON #3-Black Toad Habitat should be an ACEC Overlay.
- POLYGON #4-Eliminate Class "L" in favor of Class "M",  
with an ACEC Overlay on Inyo Mountains which  
is habitat vital for Bighorn Sheep.
- POLYGON #5-Eliminate Class "L" in favor of Class "M"  
with an ACEC Overlay to manage range for  
both cattle and winter range for Mule Deer.
- POLYGON #6-Eliminate Class "L" in favor of Class "M".  
Recommend keeping the Wilderness; but with  
a one way north-bound corridor between sand  
dunes and Saline Valley.
- POLYGON #7-No recommendations except for one way corridors.
- POLYGON #8-Eliminate Class "L" in favor of Class "M"  
and ACEC Overlay at Sand Springs to protect  
rare and endangered plants. Also an ACEC  
Overlay to manage both cattle grazing and  
winter range for Mule Deer.
- POLYGON #9-Eliminate Class "L" in favor of Class "M"  
and an ACEC Overlay should be established  
at Warm Springs to permit continued recreational  
use of hot springs with only primitive  
camping allowed as is present use.
- POLYGON #10-Eliminate Class "L" in favor of Class "M"  
and an ACEC Overlay should be established  
for Beverage Canyon, Hunter Canyon and  
Bristle Cone Pine Forest.
- POLYGON #11-Eliminate Class "C" only in Talc deposit  
areas.
- POLYGON #12-Eliminate Class "L" in favor of Class "M".  
An ACEC should be established in salt water  
and fresh water marsh to protect this rare  
ecosystem. An ACEC should be established  
to manage game populations of deer and upland  
game birds. Also to manage Bighorn Sheep  
herds and wild horses and burros and still  
permit grazing of livestock.

POLYGON #13-Eliminate Class "L" in favor of Class "M".

POLYGON #14-No recommendations.

POLYGON #15-Eliminate Class "L" in favor of Class "M"  
with an ACEC Overlay.

POLYGON #16-Eliminate Black Springs ACEC.

POLYGON #17-Eliminate Class "L" in favor of Class "M".

POLYGON #18-Eliminate Class "L" in favor of Class "M".

POLYGON #23-No recommendations need to be added.

POLYGON #24-No recommendations need to be added.

POLYGON #25-Eliminate Class "L" in favor of Class "M".  
We recommend the establishment of three more  
ACEC's in Panamint Mountains with County  
boundaries of Exhibit C, Map 5, Environmental  
Resource Areas' (ERA).

POLYGON #26-Eliminate Class "L" in favor of Class "M".  
Establish an ACEC for the Great Falls Basin  
to have consistent boundaries with Exhibit C,  
Map 5.

POLYGON #42-Eliminate Class "L" in favor of Funeral  
Mountains Wilderness as shown in Balanced  
Element with the two existing mining areas  
on the north slope of the Funerals being  
excluded from the wilderness area. Eliminate  
remainder of Class "L" with Class "M".  
Establish a "Natural Area" for the Ash Meadows  
Wildhorse herd.

POLYGON #43-Eliminate Class "L" in favor of Class "M".  
Establish a "Natural Area" for the Ash Meadows  
Wild Horse Herd.

POLYGON #44-Eliminate Class "L" in favor of Class "M".  
Establish a "Natural Area" for Eagle Mountain  
and the Ash Meadows Wild Horse Herd. Exclude  
the Zeolite deposits from the boundaries of  
the "Natural Area".

POLYGON #45-Eliminate Class "L" in favor of Class "C" for  
the northern half and Class "M" for the  
southern half.

POLYGON #46-Eliminate Class "L" in favor of Class "M".

POLYGON #47-No recommendations need to be added.

POLYGON #48-Eliminate Class "C" in favor with Class "M"  
with the Class "M" having an ACEC Overlay.



POLYGON #49-Establish the entire Amargosa Canyon south of Tecopa as an ACEC. Eliminate Class "L" in favor of Class "M".

POLYGON #50-Recommend the establishment of a 1,500 acre to 2,000 acre ACEC in the higher elevations of the Kingston Mountains in Inyo County in order to manage the Bighorn Sheep and Mule Deer populations.

WHEREAS, the Federal Land Policy and Management Act of 1976 requires the preparation and completion of a comprehensive long-range plan for the management, use, development and protection of the Public Lands within the California Desert Conservation Area (CDCA); and

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WHEREAS, a maintained county road system serves most of the area; and

WHEREAS, the private property in the area constitutes important County tax base; and

WHEREAS, the Protection Alternative will severely impact the County of Inyo (see attached Exhibit A); and

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BE IT FURTHER RESOLVED that copies of this resolution be sent to Senators Cranston and Hayakawa, Congressmen Thomas, Secretary of the Interior Andress, National Director Gregg and California State Director Ruch.

PASSED AND ADOPTED this 6th day of May, 1980.

AYES: Supervisors Irwin, Engel, Muth, Johnson and McDonald

NOES: None

ABSENT: None

ATTEST:

MARGARET BROMLEY,  
County Clerk

By K. C. Clavin  
Deputy

V. E. JOHNNY JOHNSON  
CHAIRMAN

BOARD OF SUPERVISORS

Referred 1/22/80

CAO ✓

DA \_\_\_\_\_

Other 20714 BLM file encl.

Date 5/14/80

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- POLYGON #6-Eliminate Class "L" in favor of Class "M". Recommend keeping the Wilderness; but with a one way north-bound corridor between sand dunes and Saline Valley.
- POLYGON #7-No recommendations except for one way corridors.
- POLYGON #8-Eliminate Class "L" in favor of Class "M" and ACEC Overlay at Sand Springs to protect rare and endangered plants. Also an ACEC Overlay to manage both cattle grazing and winter range for Mule Deer.
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POLYGON #25-Eliminate Class "L" in favor of Class "M". We recommend the establishment of three more ACEC's in Panamint Mountains with County boundaries of Exhibit C, Map 5, Environmental Resource Areas' (ERA).

POLYGON #26-Eliminate Class "L" in favor of Class "M". Establish an ACEC for the Great Falls Basin to have consistent boundaries with Exhibit C, Map 5.

POLYGON #42-Eliminate Class "L" in favor of Funeral Mountains Wilderness as shown in Balanced Element with the two existing mining areas on the north slope of the Funerals being excluded from the wilderness area. Eliminate remainder of Class "L" with Class "M". Establish a "Natural Area" for the Ash Meadows Wildhorse herd.

POLYGON #43-Eliminate Class "L" in favor of Class "M". Establish a "Natural Area" for the Ash Meadows Wild Horse Herd.

POLYGON #44-Eliminate Class "L" in favor of Class "M". Establish a "Natural Area" for Eagle Mountain and the Ash Meadows Wild Horse Herd. Exclude the Zeolite deposits from the boundaries of the "Natural Area".

POLYGON #45-Eliminate Class "L" in favor of Class "C" for the northern half and Class "M" for the southern half.

POLYGON #46-Eliminate Class "L" in favor of Class "M".

POLYGON #47-No recommendations need to be added.

POLYGON #48-Eliminate Class "C" in favor with Class "M" with the Class "M" having an ACEC Overlay.

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POLYGON #49 - Establish the Antelope Canyon south of Tecopa as an ACEC. Eliminate Class I. In favor of Class UM.

POLYGON #50 - Recommend the establishment of a 1,500 acre to 2,000 acre ACEC in the higher elevations of the Kingston Mountains in Inyo County in order to manage the Bighorn Sheep and Mule Deer populations.





COUNTY OF INYO  
BOARD OF SUPERVISORS  
COURTHOUSE  
INDEPENDENCE, CALIFORNIA 93526

July 28, 1980

RECEIVED

JUL 29 1980

MARGARET BRUNLEY  
EX OFFICIO CLERK OF  
BOARD OF SUPERVISORS  
DEPU

The Honorable William Thomas  
Congressman 18th District  
House Office Building  
Washington D.C. 20515

Dear Congressman Thomas:

Representatives from the Inyo County Board of Supervisors and County Staff are meeting with representatives of the Bureau of Land Management California Desert Planning Staff. The meeting is concerning the BLM California Desert Plan and its consistency with the Inyo County General Plan.

The Inyo County Board of Supervisors cordially would like to extend our invitation to you and your staff to attend this meeting.

The meeting will take place on August 13, 1980 at 9:00 a.m. at the Superintendent of School's Conference Room in Independence. It is anticipated the meeting will last about two hours. We are enclosing a map of the meeting location for your convenience.

Your attendance or a representative from your staff would be most appreciated.

Sincerely,

*Vernon E. Johnson*  
Vernon E. "Johnny" Johnson  
Chairman

10-5.4

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COUNTY OF INYO  
BOARD OF SUPERVISORS  
COURTHOUSE  
INDEPENDENCE, CALIFORNIA 93526

July 28, 1980

The Honorable Phillip Wyman  
Assemblyman 34th District  
813 West Avenue J  
Lancaster, CA 93534

Dear Assemblyman Wyman:

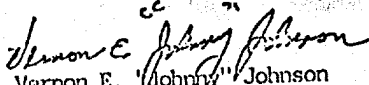
Representatives from the Inyo County Board of Supervisors and County Staff are meeting with representatives of the Bureau of Land Management California Desert Planning Staff. The meeting is concerning the BLM California Desert Plan and its consistency with the Inyo County General Plan.

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Your attendance or a representative from your staff would be most appreciated.

Sincerely,

  
Vernon E. "Johnny" Johnson  
Chairman





County of  
INYO

PLANNING DEPARTMENT

Drawer L • INDEPENDENCE • CALIFORNIA 92526 • (714) 878-2411 (Ext. 318)

July 28, 1980

Mr. Martin Prisco, Regional Planner  
BLM, California Desert Planning Program  
3610 Central Avenue, Suite 402  
Riverside, CA 92506

Dear Martin:

This letter is to confirm the meeting time and location concerning the time and location of a meeting between representatives of Inyo County and representatives of the BLM California Desert Plan Staff, as per our phone conversation of July 28, 1980.

The meeting will take place on August 13, 1980, at 9:00 a.m. at the Superintendent of School's Conference Room, Independence. We are enclosing a map of the meeting location for your convenience.

The Board of Supervisors have invited Congressman Thomas, and Assemblyman Wyman and/or their representatives to attend this meeting.

Sincerely,

*Gerald Budlong*  
Gerald Budlong  
Associate Planner

GB/mss

ENCL:



County of  
**INYO**

**PLANNING DEPARTMENT**

Drawer 11 INDEPENDENCE • CALIFORNIA 93526 • (714) 878-2411 (Ext. 318)

**PLANNING DEPARTMENT STAFF REPORT**

**AGENDA ITEM**  
November 18, 1980

**CALIFORNIA DESERT CONSERVATION PLAN**

**BACKGROUND:**

In 1973 an environmental organization called the Natural Resources Defense Council (NRDC) filed suit in Federal Court to require BLM to prepare regional site specific Environmental Impact Statements for grazing management decisions covered in grazing allotment management plans.

In December 1974 the Federal Court ruled in favor of NRDC. The court ordered BLM to prepare a series of regional Environmental Impact Statements for all grazing management plans rather than a national one. BLM was given a deadline of September 30, 1988 to complete the court mandate. The purpose of the Court ruling is to have grazing management plans based upon local range and ecological conditions rather than one general national plan.

In 1976, Congress passed the Federal Land Policy and Management Act of 1976 (FLPMA). This act designated a seven county desert management area to be known as the "California Desert Conservation Area" (CDCA).

The purpose of the CDCA is to provide for both the immediate and future protection and administration of BLM administered lands and the formulation of a general plan which would insure multiple use of lands, sustained yield of resources and to insure environmental quality. This plan will not be subject to Congressional review or approval. Final approval of the CDCA plan is the responsibility of the Secretary of the Interior. Congress has declared the plan implementation to be initiated by September 30, 1980.

Congress further mandated in FLPMA that the Secretary of the Interior shall review those roadless areas of 5,000 acres or more of BLM administered lands identified during a Wilderness Inventory Study by 1991. The Secretary will submit Wilderness recommendations to Congress. Congress will then make the final determination on any further additions of wilderness to the National Wilderness System.

The creation of FLPMA by Congress did not eliminate the NRDC Federal Court order of 1974. As a result, the California Desert Plan has to fulfill the court order too. However, the CDCA has to fulfill the court mandate 8 years earlier than the rest of the United States.

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BLM implemented FLPMA first by implementing the California Desert Vehicle Program. This program is a temporary management program which has designated those lands which are open and closed to vehicles.

BLM then created a multi-disciplinary team of environmental scientists, geologists, archaeologists and resource inventory professionals. The purpose of this team was to inventory the resources of the CDCA. Upon completion of this inventory a professional planning team was to develop a plan based upon the inventoried data. In the meantime, the planning team performed a Wilderness Inventory Study on the CDCA.

#### COUNTY INVOLVEMENT:

FLPMA mandates that BLM coordinate their planning activities with those of other Federal agencies, and State and local governments. Land Use Plans of BLM are to be consistent with State and local plans to the maximum extent the Secretary of the Interior finds consistent with Federal law and purposes of FLPMA.

As a result of this Congressional mandate, Inyo County officials and staff have coordinated the County General Plan revisions with the CDCA staff.

#### CALIFORNIA DESERT PLAN LAND CLASSES, PLAN ELEMENTS AND ACEC's:

The CDCA staff has been placed in unenviable position of coordinating two Congressional mandates and one Federal Court Order. In addition, they had to coordinate with many Federal and State agencies; including all military branches of service, seven County Governments, many city governments and still satisfy public participation requirements.

#### DESCRIPTION OF CDCA PLAN:

The Plan consists of the Final Environmental Impact Statement and Proposed Plan. In addition, there are seven volumes of the appendices.

The CDCA was divided into irregular 30 to 400 square mile geographic areas called "Polygons". Inyo County is composed of 31 polygons.

Then there are four multiple use classes with guidelines. These classes are defined as follows:

Class C (Controlled Use) is a class designed to preserve and protect wilderness values.

Class L (Limited Use) is a class designed to provide low intensity multiple use of resources that can be controlled to insure that environmental and resource values are protected and preserved.

Class M (Moderate Use) is designed to provide a wide range of present and future uses including mining, grazing, etc. Policies are designed to conserve desert resources and mitigate damage to these resources by permitted uses.

Class I (Intensive) is designed to permit the use of lands and resources to meet consumptive needs with reasonable mitigation while still maintaining sensitivity to environmental and resource values.

Superimposed upon all of the land classes discussed above are 12 plan elements. A Plan Element is designed to provide more detail on specific management guidance. The 12 elements are:

1. Cultural Resources Element
2. Native American Element
3. Wildlife Element
4. Vegetation Element
5. Wilderness Element
6. Wild Horses and Burros Element
7. Livestock Grazing Element
8. Recreation Element
9. Motorized Vehicle Access Element
10. Geology-Energy-Minerals (G-E-M) Element
11. Energy Production and Utility Corridors Element
12. Land Tenure Adjustment Element

In addition to the Land Classes and Plan Elements is the inclusion of "Areas of Critical Environmental Concern" (ACEC), Habitat Management Plans (HMP), Road Designation Restriction (RDR) and Special Attention Areas (SA). There are 14 ACECs, 11 HMPs, 4 RDRs and 3 SAs. Further policies on the Elements and ACECs are listed in the appendices.

LAND CLASS DISTRIBUTION IN INYO COUNTY:

The Planning Staff reviewed that portion of the CDCA that is located only within the boundaries of Inyo County. We refer to this study area as "area" throughout the remainder of this report. The final plan is similar to the former Balanced Alternative. However, the plan has added additional class "L" and "C" recommendations at the expense of classes "M" and "I". The final plan now has combined classifications "C" and "L" covering about 85% of the total area of an area larger than the Death Valley National Monument (Inyo County).

The combined M and I classifications are made up of about 15% of the area; with class I amounting to about 17% of the area.



1. Prohibitions regarding access of motorized vehicles in class "C" and the restrictive access of class "L" could severely impact mining, grazing, recreation, Indian religion, and scientific study.
2. Agriculture other than grazing will be prohibited in seven areas and permitted in three areas on suitable lands.
3. The placement of 85% of the land in the area into Class "C" and Class "L" could have a severe impact on the extraction and utilization of mineral resources.
4. The BLM is still considering the acquisition of private and state property within areas designated as sensitive or unique through exchange or purchase, unless the management of those resources is assured by another appropriate agency or entity.

#### PUBLIC PARTICIPATION

The Board of Supervisors previously commented on the February 1980 draft of the California Desert Conservation Area Plan. Comments made by the Board on this current September 1980 Plan will be the final opportunity for protesting this Plan. The BLM comment period will end on November 21, 1980. The BLM will review our comments over a 14 day review process in order that Secretary of the Interior Andress will have the opportunity to sign the Plan. Previously the BLM review process was 60 days.

The Plan will be implemented afterward by BLM not Congress (No Congressional review will occur). The only responsibility Congress will have is the final decision on whether to create new wilderness areas within the Desert Plan Area. Therefore, further opportunities for the County to protest the plan after Nov. 21 1980 will be through the courts.

#### RECOMMENDATIONS

1. Include the above mentioned "IMPACTS OF CDCA PLAN ON INYO COUNTY" in the body of comments to BLM.
2. Send BLM the Draft Conservation and Open Space Element Maps developed by the Planning Department and Citizen Committees.
3. The County should oppose the final proposed plan of the California Desert Conservation Area.
4. The County's comments on the Draft California Desert Conservation Area Plan of February 1980 utilized the "USE ALTERNATIVE"; subject to added comments presented through a Polygon by Polygon approach. The following comments regarding the Final Proposed Plan of September 1980 County comments will also utilize this same approach in order to be consistent with the previous County comments.

- A. POLYGON #1 - Eliminate Class "L" in favor of Class "M" as recommended previously. The BLM Plan does not consider the arable lands and mineral resources.
- B. POLYGON #2 - Eliminate Class "L" in favor of Class "M" as recommended previously. The County favors the USE ALTERNATIVE. The BLM Plan does not consider the arable lands and mineral resources.
- C. POLYGON #3 - Eliminate Class "L" in favor of Class "M" as recommended previously. The County favors the USE ALTERNATIVE. The BLM Plan does not consider the arable lands and mineral resources. We do support a Class "L" and/or "ACEC" at the BLACK TOAD HABITAT as drawn in "County ERA No. 43; MAP 3, EUREKA VALLEY."
- D. POLYGON #4 - Eliminate Class "L" in favor of Class "M" as recommended previously. The BLM Plan does not consider the mineral resources. We do support a Class "L" and/or "ACEC" at the Deep Springs Lake Bighorn Sheep habitat as drawn in County ERA No. 44; Map 3, EUREKA VALLEY. We also support the BLM recommendation of Class "M" at the Talc Claims at T8S, R37E.
- E. POLYGON #5 - Eliminate Class "L" in favor of Class "M" with exception of County ERA No. 45; Map 3, EUREKA VALLEY. The purpose would be to protect the Bighorn Sheep habitat, Mule deer winter range and cattle range. We recommend an establishment of an "ACEC".
- F. POLYGON #14- Eliminate Class "C" in favor of Class "M". The BLM Plan does not consider the mineral resources in the "Class C" areas.
- G. POLYGON #15- Eliminate Class "C" in favor of Class "L", Class "M", and Class "I" as delineated in the USE ALTERNATIVE. The County opposes the locking up of the last sand dune in the County, leaving the ORV recreationalists with no dunes for ORV travel.
- H. POLYGON #16- Eliminate Class "L" in favor of Class "M". The County recommends Class "M" as delineated in the USE ALTERNATIVE. The BLM Plan does not consider the mineral resources in Class "L" areas; which include potential uranium deposits.
- I. POLYGON #17- Eliminate "Class C" in favor of Class "M". Eliminate Class "L" in favor of Class "M" with the exception of those lands covered by County ERA's 40 (Rose Spring), 41 (Red Hill Cinder Cone) and 42 (Fossil Falls) which should remain Class "L" with an "ACEC" designation shown on Map 2, Olancha-Pearsonville. The BLM Plan does not consider the mineral resources and arable lands.

The County also opposes the Federal disposal of approximately 5,000 acres at the Haiwee Reservoir. We recommend the BLM and Los Angeles Dept of Water and Power consider the possibility of establishing a public recreation area at Haiwee Reservoir after the completion of the L.A. Aqueduct Filtration Plant.



- J. POLYGON #18 - Eliminate Class "C" in favor of Class "M". Eliminate Class "L" in favor of Class "M". The BLM Plan does not consider the mineral resources and arable lands.
- K. POLYGON #23 - Class "L" should be reduced to the boundaries of County ERA's 36 (Darwin Falls) and 37 (Argus Range) on Map 2, Olancha-Pearsonville and Map 5, Homewood Canyon-Panamint Valley. The BLM Plan does not consider the mineral resources.
- L. POLYGON #24 - Eliminate Class "L" in favor of Class "M". Eliminate Class "C" in favor of Class "M". The County is in favor of the USE ALTERNATIVE. The BLM Plan does not consider the mineral resources.
- M. POLYGON #6 - Eliminate Class "L" in favor of Class "M" as recommended previously. The BLM Plan does not consider the mineral resources located north of Eureka Valley Road. The County recommends keeping the wilderness, but with a one-way north-bound corridor between Eureka Sand Dunes and Saline Valley in order to prevent severe Environmental Impact to some pristine canyon ecosystems and plant communities.
- N. POLYGON #7 - No recommendations except for a one-way corridor as recommended previously for same reasons stated in Polygon #6.
- O. POLYGON #8 - Eliminate Class "L" in favor of Class "M" and ACEC Overlay or Class "L" at Sand Springs to protect rare and endangered plants. Also an "ACEC" Overlay or Class "L" to manage both cattle grazing and winter range for Mule Deer. This recommendation was also recommended previously. The "ACEC's" or Class "L" are shown on Map 3; EUREKA VALLEY, County ERA's 45 and 47.
- P. POLYGON #9 - Eliminate Class "L" in favor of Class "M". An ACEC should be established at Warm Springs to permit continued recreational use of hot springs with only primitive camping allowed as is present use.
- Q. POLYGON #10 - Eliminate Class "L" in favor of Class "M". The BLM Plan does not consider the mineral resources. Eliminate Class "C" in favor of Class "L" and/or "ACEC" at "Inyo Mountains Natural Area" and Saline Valley Salt Tram as drawn in "County ERA No. 32 and ERA No. 33", MAP 4; SALINE VALLEY. Eliminate Class "C" outside and above ERA's in favor of Class "M".
- R. POLYGON #11 - Eliminate Class "C" in favor of Class "M" only in Talc deposit areas as previously recommended. The BLM Plan does not consider the mineral resources.
- S. POLYGON #12 - Eliminate Class "C" in favor of Class "L". Eliminate Class "L" in favor of Class "M". The County supports the USE ALTERNATIVE since the BLM revised the Class "L" criteria. The BLM Plan does not consider the mineral resources.
- T. POLYGON #13 - Eliminate Class "L" in favor of Class "M".

15. Our last comment concerns the Appendices of the Plan. These appendices had specific policies and actions that concerned public, private and state lands. Also, there were policies that addressed the acquisition of water rights of certain communities, businesses and industries in Inyo County. In addition, at least one county road was proposed to be closed by the BLM. As a result of the detailed policies addressed in the appendices, the public should have been given the entire plan.

We recommend the BLM publically announce the importance of the appendices, extend the review time and distribute the appendices to the public.

The Board would like to take the opportunity to thank the BLM California Desert Planning Staff for inviting the County to comment on the Plan. We also would like to thank the BLM for providing the County with CDCA resource data.

RESOLUTION NO. 80-124

A RESOLUTION OPPOSING THE FINAL ENVIRONMENTAL IMPACT STATEMENT, PROPOSED PLAN AND APPENDICES OF THE CALIFORNIA DESERT CONSERVATION AREA.

WHEREAS, the elected officials and staff of Inyo County and the BLM California Desert Planning Staff have met and attempted to coordinate and achieve consistency with the County General Plan and the California Desert Plan for a period approaching three years; and

WHEREAS, the Board of Supervisors have passed and adopted Resolutions 78-111, 79-40, 79-120 and 80-51 concerning the adverse impacts of the California Desert Plan; and

WHEREAS, the County has expended a great amount of money and time in the coordination process of the California Desert Plan; and

WHEREAS, the Final Environmental Impact Statement, Proposed Plan and Appendices will severely impact Inyo County (See attached Exhibit A); and

WHEREAS, the Inyo County Board of Supervisors seek relief from the adverse impacts of the California Desert Plan upon the People of Inyo County; and

NOW, THEREFORE, BE IT RESOLVED that the Inyo County Board of Supervisors does hereby oppose the Final Environmental Impact Statement, Proposed Plan and Appendices of the California Desert Conservation Area; and

BE IT FURTHER RESOLVED that the Inyo County Board of Supervisors shall oppose the implementation of the adverse portions of the California Desert Plan, through all legal means.

BE IT FURTHER RESOLVED that the Inyo County Board of Supervisors seeks the continuation of intergovernmental cooperation and coordination between BLM and County of Inyo.

BE IT FURTHER RESOLVED that copies of this resolution be sent to Senators Cranston and Hayakawa, Congressman Thomas, Secretary of the Interior Andress, National Director Gregg and California State Director Ruch.

PASSED AND ADOPTED this 18th day of November, 1980.

ATTEST:

Margaret Cromley, Clerk

BY Belle Hamner  
Deputy

Vernon E. Johnson  
Vernon E. "Johnny" Johnson  
Chairman

1/176

10-5.4

11/18/80

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E. X. H. I. B. I. T. "A"SPECIFIC COMMENTS ON THE FINAL ENVIRONMENTAL  
IMPACT STATEMENT, PROPOSED PLAN AND  
APPENDICES OF THE CALIFORNIA DESERT  
CONSERVATION AREA

The Inyo County Board of Supervisors oppose the BLM California Desert Plan because of the numerous inconsistencies between the County Draft Conservation and Open Space Elements and the BLM California Desert Plan. Also, this BLM Plan does severely impact the people of Inyo County.

COUNTY INVOLVEMENT:

FLPMA mandates that BLM coordinate their planning activities with those of other Federal agencies, and State and Local governments. Land Use Plans of BLM are to be consistent with State and Local plans to the "maximum extent the Secretary of the Interior finds consistent with Federal law and purposes of FLPMA."

As a result of this Congressional mandate, Inyo County Officials and Staff have coordinated the County General Plan revisions with the CDCA Staff. The CDCA Staff did also provide County Staff with BLM generated resource data in order to help the County with the preparation of the County Conservation and Open Space Elements.

LAND CLASS DISTRIBUTION IN INYO COUNTY:

County Staff reviewed that portion of the CDCA that is located only within the boundaries of Inyo County. We refer to this study area as "area" throughout the remainder of the comments. The Final BLM Plan is similar to the former Balanced Alternative. However, the Plan has added additional Class "L" and "C" recommendations at the expense of Classes "M" and "I". The Final Plan now has combined classifications "C" and "L" covering about 85% of the total area of an area larger than the Death Valley National Monument (Inyo County).

The combined "M" and "I" classifications are made up of about 15% of the area; with Class "I" amounting to about 1 % of the area.

GENERAL IMPACTS OF CDCA PLAN ON INYO COUNTY:

1. Prohibitions regarding access of motorized vehicles in Class "C" and the restrictive access of Class "L" could severely impact mining, grazing, recreation, Indian religion, and scientific study.
2. Agriculture, other than grazing, will be prohibited on public lands.
3. The placement of 85% of the land in the area into Class "C" and Class "L" could have a severe impact on the extraction and utilization of mineral resources.



4. The BLM is still considering the acquisition of private and State property within areas designated as sensitive or unique through exchange or purchase, unless the management of those resources is assured by another appropriate agency or entity.

SPECIFIC COMMENTS:

1. Include the above mentioned "IMPACTS OF CDCA PLAN ON INYO COUNTY" in the body of comments to BLM.
2. Send BLM the Draft Conservation and Open Space Element Maps developed by the Planning Department and Citizen Committees.
3. The County should oppose the final proposed plan of the California Desert Conservation Area.
4. The County's comments on the Draft California Desert Conservation Area Plan of February 1980 utilized the "USE ALTERNATIVE"; subject to added comments presented through a Polygon by Polygon approach. The following comments regarding the Final Proposed Plan of September 1980 County comments will also utilize this same approach in order to be consistent with the previous County comments.

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- POLYGON #11 - Eliminate Class "C" in favor of Class "H" only in talc deposit areas as previously recommended. The BLM Plan does not consider the mineral resources.
- POLYGON #12 - Eliminate Class "C" in favor of Class "L". Eliminate Class "L" in favor of Class "M". The County supports the USE ALTERNATIVE since the BLM revised the Class "L" criteria. The BLM Plan does not consider the mineral resources.
- POLYGON #13 - Eliminate Class "L" in favor of Class "M".
- POLYGON #14 - Eliminate Class "C" in favor of Class "M". The BLM Plan does not consider the mineral resources in the "Class C" areas.
- POLYGON #15 - Eliminate Class "C" in favor of Class "L", Class "M", and Class "I" as delineated in the USE ALTERNATIVE. The County opposes the locking up of the last sand dune in the County, leaving the ORV recreationalists with no dunes for ORV travel.
- POLYGON #16 - Eliminate Class "L" in favor of Class "M". The County recommends Class "M" as delineated in the USE ALTERNATIVE. The BLM Plan does not consider the mineral resources in Class "L" areas; which include potential uranium deposits.
- POLYGON #17 - Eliminate "Class C" in favor of Class "M". Eliminate Class "L" in favor of Class "M" with the exception of those lands covered by County ERA's 40 (Rose Spring), 41 (Red Hill Cinder Cone) and 42 (Fossil Falls) which should remain Class "L" with an "ACEC" designation shown on Map 2, Olancho-Pearsonville. The BLM Plan does not consider the mineral resources and arable lands.  
  
The County also opposes the Federal disposal of approximately 5,000 acres at the Haiwee Reservoir. We recommend the BLM and Los Angeles Dept of Water and Power consider the possibility of establishing a public recreation area at Haiwee Reservoir after the completion of the L.A. Aqueduct Filtration Plant.
- POLYGON #18 - Eliminate Class "C" in favor of Class "M". Eliminate Class "L" in favor of Class "M". The BLM Plan does not consider the mineral resources and arable lands.
- POLYGON #23 - Class "L" should be reduced to the boundaries of County ERA's 36 (Darwin Falls) and 37 (Argus Range) on Map 2, Olancho-Pearsonville and Map 5, Homewood Canyon-Panamint Valley. The BLM Plan does not consider the mineral resources.
- POLYGON #24 - Eliminate Class "L" in favor of Class "M". Eliminate Class "C" in favor of Class "M". The County is in favor of the USE ALTERNATIVE. The BLM Plan does not consider the mineral resources.



- U. POLYGON #25 - Eliminate Class "C" in favor of Class "M". Reduce the boundaries of Class "L" to be consistent with County ERA 51, Map 5, Homewood Canyon-Panamint Valley. The Class "L" lands located outside of the County ERA's should be changed to Class "M". The BLM Plan does not consider mineral resources.
- V. POLYGON 36 - Eliminate Class "L" in favor of Class "M", except at Great Falls Basin. The Great Falls Basin should remain Class "L" and/or ACEC. The boundaries should be consistent with County ERA-Great Falls Basin No. 50, Map 5, Homewood Canyon-Panamint Valley. The BLM Plan does not consider mineral resources.
- W. POLYGON #42 - Eliminate Class "L" in favor of Funeral Mountains Wilderness as shown in BALANCED ALTERNATIVE with the two existing mining areas on the north slope of the Funerals being excluded from the wilderness area. Eliminate remainder of Class "L" in favor of Class "M" except the area to establish a "Natural Area" for the Ash Meadows Wildhorse herd. The "Natural Area" should correspond to the County ERA No. 54, Map 7, Shoshone-Tecopa and be designated "Class "L" and/or "ACEC". The BLM Plan does not consider mineral resources.
- X. POLYGON #43 - Eliminate Class "L" in favor of Class "M" except the area to establish a "Natural Area" for the Ash Meadows Wildhorse Herd. The "Natural Area" should correspond to the County ERA No. 54, Map 7, Shoshone-Tecopa and be designated Class "L" and/or "ACEC". The BLM Plan does not consider mineral resources.
- Y. POLYGON #44 - Eliminate Class "C" in favor of Class "M". Establish a "Natural Area" for Eagle Mountain and the Ash Meadows Wildhorse Herd. The "Natural Area" should correspond to the County ERA No. 54, Map 7, Shoshone-Tecopa and be designated Class "L" and/or "ACEC". The BLM Plan does not consider the mineral resources in the Resting Springs Range.
- Z. POLYGON #45 - Eliminate Class "L" in favor of Class "C" for the northern half and Class "M" for the southern half. The BLM Plan does not consider the mineral resources.
- A.<sup>1</sup> POLYGON #46 - Eliminate Class "L" in favor of Class "M". Eliminate Class "C" in favor of Class "M". The BLM Plan does not consider mineral resources.
- B.<sup>1</sup> POLYGON #47 - The County commends the BLM for following our recommendations of the draft February 1980 California Desert Conservation Area Plan.
- C.<sup>1</sup> POLYGON #48 - The County favors the USE ALTERNATIVE. The County favors the Class "C" of the final plan be reduced to either the USE ALTERNATIVE boundaries of Class "C" or the boundaries of County ERA No. 57, Map 7, Shoshone-Tecopa. The BLM Plan did not consider the arable lands in the Chicago Valley, Pahrump Valley and Stewart Valley. Also the BLM did not consider mineral resources.



- D. <sup>1</sup> POLYGON #49 - Eliminate Class "L" in favor of Class "M" and Class "I" as delineated in the USE ALTERNATIVE. The BLM Plan does not consider the mineral resources.
- E. <sup>1</sup> POLYGON #50 - Eliminate Class "E" in favor of Class "M". The BLM Plan does not consider the arable lands and mineral resources in California Valley.
5. We are making comments on the individual ACEC's. Our comments are as follows:
- A. White Mountain City - No Comment
  - B. Deep Springs Valley - Black Toad Habitat - The ACEC boundaries are drawn too broadly. The ACEC should reflect the U.S. Fish & Wildlife Service boundaries of Black Toad Habitat (same as VERA No. 43)
  - C. Eureka Valley Dunes - ACEC boundaries should be expanded to include the entire County ERA No. 46
  - D. Saline Valley - ACEC boundaries are drawn too broadly; they should only include the freshwater and saline water marsh and adjoining riparian habitat. We see no justification to include the dunes.
  - E. Cerro Gordo - The majority of the important Cerro Gordo land including the old town of patented mining claims owned by private parties. The claims are zoned O.S. We oppose the creation of an ACEC here.
  - F. Darwin Falls - The boundaries of the proposed ACEC do not make sense. The ACEC excludes Darwin Falls and China Garden which should be in the ACEC. However, the ACEC includes the entire Darwin Wash from the Darwin Falls vicinity to State Route 190. We see no justification to include the entire Darwin Wash.  
  
We oppose the cancelling or acquiring of water rights in the Darwin Falls area, as well as prohibiting hunting in the canyon.
  - G. Rose Spring - No comment
  - H. Surprise Canyon - The ACEC boundaries are drawn too broadly. They should include the riparian area and culturally or historic important areas only.
  - I. Green Water Canyon - We object to the plan proposal of closing the Green Water Canyon County Road.
  - J. Fossil Falls - ACEC boundaries should be drawn more extensive to include the archaeological and geologically significant features as drawn in County ERA No. 42
  - K. Sard Canyon - No comment

Great Falls Basin - ACEC boundaries are drawn too broadly. The ACEC should reflect the boundaries of County ERA No. 49. The Inyo Brown Towhee bird species that benefits from the activities of mankind. These activities create food, water, nesting and other resources that can be utilized by this bird species. If the boundaries of the ACEC are located beyond the Great Falls Basin in order to protect the Inyo Brown Towhee we cannot see the justification.

We are also against the acquisition of unappropriated or unused water rights by the Federal Government. We also are against the prohibition of hunting in the ACEC, if this is the intention of the Bureau.

- ii. Amargosa River/Grimshaw Lake - First, the boundaries are drawn incorrect, they miss the Amargosa River with the exception of the gypsum claims on the order of two to three miles. Second, the ACEC boundaries should only include the Amargosa River and its riparian area. The terrestrial land located outside the flood plain should be eliminated. Third, we oppose the placement of China Ranch and the gypsum claims which are all private property in ACEC designation. Fourth, we oppose the inclusion of Grimshaw Lake into an ACEC, it is private property and it is a manmade reservoir.
- N. Kingston Range - We did recommend the BLM include part of the Kingston Range as an ACEC. However, we recommended the ACEC to be from 1,500 to 2,000 acres in the higher elevations in order to manage the Bighorn Sheep and Mule deer populations. The creation of a 19,000 acre ACEC is excessive and is not justifiable when the California Fish and Game data is reviewed. We desire the boundaries to be reduced to those of County ERA No. 59.
6. We are making comments on the individual "Special Attention Area" (5A). Our comments are as follows:
  - A. Cottonwood Creek - No comment
  - B. Panamint Valley Dunes - We object to the Panamint Dunes being closed to ORV use. The BLM and National Park Service have now closed all dunes in Inyo County to ORV use. We are of the opinion that at least one dune system should be retained for this use. We recommend the Panamint Dunes be used for this use. ORV use was recommended in the BLM BALANCED ALTERNATIVE.
  - C. Black Springs - We are puzzled why this action is necessary. We see no justification.
7. We are making comments on the Road Designation Restriction (RDR), our comments are as follows:
  - A. Panamint Lake - We are puzzled why this action is necessary. We see no justification.
  - B. Chicago Valley - Resting Springs Mesquite Thicket. We are opposed to this recommendation. We see no justification for this action, especially when mesquite thicket is common in Inyo County if not the entire American Southwest.
  - C. California Valley Mesquite Thicket - Our comments are identical to the above (Chicago Valley).

8. We are making comments on the individual habitat management plans (HMP).

A. Deep Springs Valley (Shadscale community) - The Shadscale community is one of the most common plant communities in Inyo County if not CDCA. Our contention of the Shadscale community being common is confirmed upon reviewing the BLM Bakersfield District Coso KGRA Final EIS. The Bakersfield District Resources Specialists state that Shadscale is COMMON in depressions and in larger basins in the Coso Geothermal Study Area (CGSA), including Rose Valley, Sugarloaf Mountain vicinity, and Cactus Peak vicinity. Why is the Shadscale community at Deep Springs more valuable than at Coso or else where in the CDCA? Why is the CDCA Plan inconsistent with the BLM Bakersfield District COSO KGRA EIS?

We concur with the BLM Bakersfield District opinion that the Shadscale community is a common plant community and as such we see no justification for an HMP for the Deep Springs Shadscale community.

- B. Eureka Valley Dunes - No further comment other than what was said concerning the ACEC.
- C. Eastslope Inyo Mountains - We see no justification for the boundaries of this HMP. The important and vital habitat of bighorn sheep are in Beveridge and Hunter Canyons. The rare and endangered plant species and valuable botanical area are also located in Beveridge and Hunter Canyons. The ancient Bristlecone Forest is along the Inyo crest. We cannot justify including the seasonal, intermittent and irregular bighorn sheep habitat as identified by California Department of Fish and Game (Weaver) into an HMP.
- D. Saline Valley - We oppose including the Dunes and Mesquite Thicket into an HMP. We see no justification for dunes and mesquite to be included in a HMP. We support a HMP or ACEC at the salt and freshwater marsh and the riparian area.
- E. Hunter-Cottonwood Mt./Grapevine Cyn. (Bighorn sheep habitat) - We cannot see the justification of extending the HMP north of the Ubehebe Road (4012). The bighorn sheep habitat is either absent, seasonal, intermittent and/or irregular. We recommend the HMP be consistent with County ERA No. 35.
- F. Our comments stated above concerning the Deep Springs Valley Shadscale community apply equally for the Lee Flat Shadscale plant community. Why is this Shadscale community so important that an HMP is needed? Why is the CDCA Plan in conflict with the BLM Bakersfield Resource Data contained in the Coso KGRA EIS?
- G. Argus Mountains (Bighorn sheep habitat) - The designation of an HMP is only warranted for the Argus Range north of the Onyx Mine vicinity because of the important, vital and/or permanent bighorn sheep habitat. The bighorn sheep habitat south of the Onyx Mine as shown in the HMP is seasonal, intermittent and/or irregular.
- H. Argus Range (Inyo Brown Towhee) - We recommend that this HMP be reduced to the boundaries of County ERA No. 50 (Great Falls Basin).



J. The Rose Valley (Mojave Ground Squirrel Habitat) - The Mojave Ground Squirrel HMP is internally inconsistent with the Wildlife Element (Sensitive, Rare, Threatened and Endangered Fish and Wildlife Map). The Mojave Ground Squirrel Resource information is also inconsistent with the BLM Bakersfield District Coso KGRA Final EIS and Naval Weapons Center comments on Coso KGRA Final EIS.

The HMP does not recognize the entire crucial habitat at the Haiwee Reservoir nor does it recognize about 50% of the crucial habitat located adjacent to the Naval Weapons Center in Rose Valley, as illustrated in the Wildlife Element. In the Coso KGRA Final EIS, Figure 2.7.2-1 SENSITIVE WILDLIFE HABITAT AREAS OF CGSA does not show any crucial habitat of Mojave Ground Squirrel. Whereas, the CDCA Plan, Wildlife Element illustrates two relatively large crucial habitats of Mojave Ground Squirrel.

The Coso KGRA Final EIS also states the Mojave Ground Squirrel was found to be relatively abundant in virtually all habitat types in CGSA except steep rocky slopes. The highest densities were observed in Rose Valley and on the Sierra slope west of U.S. Hwy. 395. The Naval Weapons Center concurs with the Coso KGRA Final EIS. The Naval Weapons Center in their May 19, 1980 comments states that "the Mojave ground squirrel exists around China Lake and Ridgecrest in numbers sufficient to be considered common to this area. While some population surveys of this rodent should be conducted on a site-specific basis during the development phases, it is not believed that the CGSA contains a habitat critical to the existence of this species."

We recommend that the CDCA Plan and Coso KGRA Final EIS be consistent. We also recommend the CDCA Plan be internally consistent.

We also would like to state that since the majority of the habitat is located outside Inyo County and we really do not see a need to place additional acreage under Mojave Ground Squirrel HMP. We, therefore, oppose a HMP in Rose Valley.

10. We are next addressing the ORV Free Play Areas that the Plan has eliminated.

A. Olancha Free Plan Area.

- (1) We oppose the closure and elimination of the Olancha Free Plan Area. This area historically was open to ORV use. The Plan now closes the last free play area in the County that Inyo residents and visitors can use.
- (2) We recommend the Olancha Free Play Area be re-established. We do recommend the localities having rare and endangered plant species at T19S, R37E, Sections 14, 28 and 34 and T20S, R37E, Sections 2 & 3 be excluded from the free play area. Our justification for this action is that it is unfair to expect residents and visitors to obey land closures unless the Bureau institutes realistic planning.

(1) Again, the Plan closes the remaining dune system in the County that was open to ORV use. The Federal Government has now instituted a total ban on ORV travel in the county and that is unfair.

- 10. There is no policy addressing hazards that present a risk to humans such as abandoned concentrations of mining shafts on public lands.
- 11. The Plan does not address Presidential Executive Order 6206; a City of Los Angeles Watershed Withdrawal.
- 12. We find the Energy & Utility Element and allowed land use actions pertaining to transmission lines in all multiple use classes to be against the interests of the Nation, State and County of Inyo. The proposed plan only addresses corridors in the Owens-Rose and Indian Wells Valleys. The public need of corridors in the remainder of the county have been ignored. This proposed BLM policy has resulted in the "Rocky Mountain Pipeline Central Nevada Alternative" to be routed outside of the California Desert Planning Area of Inyo County, resulting in an additional 50 to 60 miles being added to this alternative.

The Board recommends the Plan consider the establishment of a realistic network of joint-use planning corridors capable of meeting projected needs resulting from the establishment of wind, solar, geothermal and other alternative energy generating sources as well as projected energy pipeline needs.

- 13. This comment concerns the retention of Burro Range at the southern Eureka Valley, Northern Saline Range and Southern Last Chance Range, the burros could severely impact unique pristine desert canyons that are of valuable botanical importance. These canyons especially the one at the Last Chance Range - Saline Range geological contact should be designated an ACEC.
- 14. We do not understand why the following arable lands were not included in Volume E, Appendix X, Table xi 2-1 (page 149):

Olancha-Grant	3,000 acres
Rose Valley	10,900 acres
Pearsonville	3,200 acres
Deep Springs Valley	16,000 acres
Fish Lake Valley	9,600 acres
Searles Valley	10,200 acres
Upper Amargosa	3,200 acres
China Ranch	600 acres
Chicago Valley	6,500 acres
Resting Springs	300 acres
Stewart Valley-Pahrump Valley	52,500 acres
California Valley	7,020 acres
Mesquite Valley	5,100 acres

15. Our last comment concerns the Appendices of the Plan. These appendices had specific policies and actions that concerned public, private and State lands. Also, there were policies that addressed the acquisition of water rights of certain communities, businesses and industries in Inyo County. In addition, at least one County Road was proposed to be closed by the BLM. As a result of the detailed policies addressed in the Appendices, the public should have been given the entire Plan.

We recommend the BLM publically announce the importance of the Appendices, extend the review time and distribute the Appendices to the public.

The Board would like to take the opportunity to thank the BLM California Desert Planning Staff for inviting the County to comment on the Plan. We also would like to thank the BLM for providing the County with CDCA resource data.

Sincerely,

*Vernon E. "Johnny" Johnson*  
Vernon E. "Johnny" Johnson  
Chairman

File for public review 80-124  
and related by the Inyo County Board of Supervisors  
at the meeting held on November 15, 2007  
40  
Supervisors: Quin, Johnson,  
North, Engel & McDonald  
None  
U.E. "Johnny" Johnson  
Chairman  
*Kelli Hummel* Pop. Comm