

California Native Plant Society

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BLM EI Centro Field Office
1661 S. 4th Street,
EI Centro, CA 92243
caisdrmp@ca.blm.gov

RE: Imperial Sand Dunes Draft Recreation Area Management Plan and DEIS

Dear Sir or Madam,

We appreciate the opportunity comment on the Imperial Sand Dunes Draft Recreation Area Management Plan and Draft Environmental Impact Statement. The California Native Plant Society (CNPS) works to protect California's native plant heritage and preserve it for future generations. CNPS promotes sound plant science as the backbone of effective natural areas protection. We work closely with decision-makers, scientists, and local planners to advocate for well informed and environmentally friendly policies, regulations, and land management practices.

CNPS supports a realistic balance of conservation and recreation in the Imperial Sand Dunes, so that all sensitive species are protected, not just the federally endangered Peirson's milk vetch (*Astragalus magdalenae* var. *peirsonii*). Under this criteria, we found substantial flaws with all alternatives. Alternative #3 is the least objectionable alternative, but only because it offers adequate protection to Peirson's milk vetch, but it is inadequate for protecting most other species, particularly those that use the microphyll woodland on the east side of the area.

Only Alternatives 3 and 8 can be legitimately considered, because only these allow for protection of the Federally Endangered Peirson's milk vetch (*Astragalus magdalenae* var. *peirsonii*). All other options promote take of Peirson's milk vetch and as such, they are not legitimate alternatives.

A We identified substantial flaws with the preferred alternative (Alternative 8). It allows off-highway vehicle (OHV) traffic on all of the planning area except for the critical habitat area designated for the Peirson's milk vetch in 2008 by the U.S. Fish and Wildlife Service. This current area is substantially smaller than the known range of Peirson's milk vetch, as shown in the previous habitat designations, so this proposed boundary will result in the take of Peirson's milk vetch. This conflicts with BLM's need to protect



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endangered species under the U.S. Endangered Species Act.

Moreover, the boundary for the critical habitat is so complex that a conscientious OHV driver could wander into it by accident. The “no-go” boundaries need to be readily seen and easily avoided, and the complex area outlined in Alternative 8 is neither.

Alternative 8 provides no protection to plants and plant communities outside of the north Algodones Dune Wilderness Area and the critical habitat mentioned above. This includes a majority of the microphyll woodland and creosote bush scrub, both of which are habitat to over 60 plant species. There is no evidence that the level of OHV traffic supported by these documents is compatible with the continued existence of rare species on these dunes.

We support the realistic consideration of low-impact low-cost visitation to the dunes in order to achieve a combination of balanced and diverse resource uses as required by the Federal Land Policy and Management Act. Of the alternatives presented, Alternative 3 is the least objectionable. It has simple outlines that are easier to enforce and avoid; therefore it has a realistic chance of being enforceable and protecting the fragile plants and vegetation of the Algodones Dunes complex. It also provides for some protection of all vegetation types within the Algodones Dunes.

Thank you for consideration of our comments.

Sincerely,

Carrie Schneider, Conservation Chair CNPS-San Diego

Cc: