

California Native Plant Society

Apr 19,
Mar. 5, 2010

Field Manager Rick Cooper
Bureau of Land Management
Hollister field Office
20 Hamilton Court
Hollister, CA 95021



RE: CCMA DRMP/EIS Comments

Dear Mr. Cooper:

The Monterey Bay Chapter of the California Native Plant Society herewith submits comments on the Draft Resource Management Plan and Environmental Impact Statement (DRMP-EIS) for the Clear Creek Management Area (CCMA).

Our chapter has been conducting field trips to the unique Idria serpentine formation and surrounding lands of the San Benito Mountain and the Clear Creek area for over 35 years. Our members have studied the unusual plant life, compiled detailed lists of the remarkable serpentine flora, and written about the unique forest (once the San Benito National Forest), the only place where Jeffrey pine, Coulter pine, and gray pine occur naturally together. We also worked to establish the San Benito Mountain Natural Area, which was intended to be closed permanently to all off-road vehicle use according to the Fresno-San Benito Management Framework Plan of 1970. We appreciate the efforts of BLM to reconcile the conflicting interests in the use of this important resource and urge that the habitat values remain paramount.

General Comments

The DRMP/DEIS document is extraordinarily complicated and difficult for the general public to assimilate and begin to provide germane comments. This is very unfortunate because we believe it excludes many individuals who appreciate the CCMA AND the surrounding 'management zones' and would otherwise be able to provide comments.

Equally unfortunate are the numerous (7) alternatives. Not one alternative, A - G, is entirely acceptable and therefore, we are requesting a combination of one or more Alternatives in order to capture the interests and concerns of our organization as well as other groups whose chief goal is the preservation of the unique natural features of the area. We therefore object to each individual alternative as they are presented in the DRMP/DEIS.

The description of the planning area (1.2) neglects to include "high number of sensitive plant and animal species", and also omits Incense cedar from the "unique forest assemblage".

All of the surrounding 'management zones' that the Hollister BLM interdisciplinary staff developed for this document have many sensitive, rare plant and animal species and communities. Decisions to "dispose" and/or develop trail networks/roads on these public lands is incongruous with conserving and protecting the sensitive natural resources that occur therein.

We oppose disposal of the lands identified in the DRMP/DEIS in the CCMA, Tucker, Condon and San Benito River management zones.



Dedicated to the preservation of California native flora

We strongly oppose development of any new OHV recreation areas by the Hollister BLM Field Office for energy consumptive, destructive recreation for the following reasons:

The CCMA has had years of OHV recreation and the HFO has failed to manage this activity effectively, including but not limited to inadequate law enforcement, insufficient trail closure and designation, inadequate soil erosion control and monitoring, and failure to protect rare plant and animal populations. Despite detailed photographic monitoring by members of our chapter, enforcement has been inadequate to protect rare, threatened and endangered species of plants and animals, whose numbers have continued to decline.

There is not adequate funding for the additional law enforcement, ranger patrols, restoration and rare species monitoring at the CCMA or any of the proposed 'new areas'. The southern Diablo Mountains are geologically and biologically diverse and sensitive and should be protected, not exploited.

We believe that the public should be allowed to drive ("tour") through the CCMA on the county roads and access this unique area for passive recreational uses (such as hiking, birding, photography, scientific research, rock hounding), including within the Serpentine ACEC. Note that Sawmill Creek should also be shown on the map as a county road. We urge BLM to work with the county to resolve the issue of access and maintenance of county roads for non-consumptive uses.

We oppose the withdrawal of grazing allotments for the purpose of OHV recreational uses. While we have legitimate concerns about the impacts of overgrazing on sensitive habitat, the damage from OHV activity is far greater.

Comments on the Alternatives

We oppose the following alternatives in their entirety:

Alternative A, No Action: this proposal is clearly unacceptable, as it has never worked in the past.

Alternative B, Annual Use Restrictions Alternative: these restrictions are complex and difficult to enforce. The earlier dry season closure would eliminate access to botanical areas of high interest and importance during the blooming season

Alternative D, New OHV Area(s): opening new trails without analyzing the plant and animal impacts is likely to result in a net loss of species before previously degraded areas have had a chance to recover.

Alternative E, F, & G: the multiple, complex restrictions on use make these alternatives unfair, impractical, and unenforceable.

Alternative C has the potential to be acceptable if a number of changes are made, including adequate surveys for sensitive plants and animals, consistent, frequent monitoring; and conscientious enforcement.

Sincerely yours,



Rosemary Foster, President
Monterey Bay Chapter CNPS