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VIA MAIL AND EMAIL

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Re: Scoping Comments on Revision of the Caliente Resource Management Plan (RMP)

Dear Planning Team:

Thank you for this opportunity to provide the U.S. Bureau of Land Management (BLM) with our comments on the proposed revision of the 1996 Caliente Resource Management Plan (RMP), which serves as a blueprint for all BLM lands in San Luis Obispo, Santa Barbara, Ventura, and Kern counties, including lands adjacent to the Carrizo Plain National Monument and the Los Padres National Forest. We appreciate your agency's efforts to update this plan with current information, and look forward to participating in the revision process. The Notice of Intent for the proposed revision of the Caliente RMP states that "the plan will establish new guidance and identify existing guidance upon which the BLM will rely in managing public lands within the Bakersfield Field Office." We hope this new guidance will provide greater protections for rare, threatened, and endangered plants and wildlife on public lands, lead to additional designation of areas with special management, and protect pristine habitat throughout the Caliente Resource Area. In this letter we will outline specific issues that we hope to see addressed in the plan revision.

Los Padres ForestWatch is a community-based nonprofit organization working to protect and restore the natural and cultural heritage of the Los Padres National Forest (LPNF), Carrizo Plain National Monument, and other public lands along California's Central Coast. Many of the BLM lands in the Caliente Resource Area are adjacent to the Carrizo Plain and the LPNF and can affect the wildlife, habitat, and wilderness qualities of these important areas. These lands provide valuable habitat for threatened and endangered wildlife, and are thus in need of special management considerations.

## **Recommendations**

The current RMP divides the Caliente Resource Area into three separate management areas: Coast; Valley; and South Sierra. Within the Coast management area is found the bulk of the LPNF, in the counties of Ventura, Santa Barbara, and San Luis Obispo. Most of the BLM lands in this management area are north of the LPNF and include lands in the Huasna and Salinas River valleys. Additionally, BLM lands in the Coast management area are found along

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*Protecting Our Public Lands Along California's Central Coast*

the southern edge of the LPNF in Ventura County, near the Sespe Condor Sanctuary and Hopper Mountain National Wildlife Refuge. The management of these southern lands is of particular concern due to the sensitive nature of the surrounding condor habitat, while many of the lands to the north are protected under such designations as Areas of Critical Environmental Concern (ACEC), Wilderness Study Areas (WSAs), and Special Management Areas (SMAs), designations that we hope will remain and/or be strengthened with the revised Caliente RMP.

In the Valley management area, BLM lands are found adjacent to the LPNF in the upper Cuyama Valley, an area identified by the U.S. Forest Service as one of “high ecological significance,” in the Kettleman Hills to the north, and almost completely surrounding the Carrizo Plain. In this area we are primarily concerned with impacts to threatened and endangered wildlife and their habitat.

Our recommendations for the revised Caliente RMP pertain solely to the Coast and Valley management areas of the Caliente Resource Area, and reflect our primary concerns of wildlife and habitat protection, healthy watersheds, and preservation of recreation and wilderness qualities on public lands. The following are specific recommendations for various land management categories, including Oil/Gas and Solid Minerals, Livestock Grazing, Recreation, Cultural Resource, Biological Resources, Air Quality, ACECs/SMAs, and Land Tenure.

### *Oil/Gas and Solid Minerals*

There are a number of areas in the Coast and Valley management areas where oil and natural gas development occurs on private and public lands. In the Coast management area, there is a substantial oil/gas field near the Sespe Condor Sanctuary and Hopper Mountain National Wildlife Refuge, and operations there may present conflicts with the recovery of the endangered California condor. Condors in the area have been seen perching on oil derricks, drinking water that is tainted with oil and other toxic chemicals, and consuming microtrash, small bits of broken glass, metal, and other materials, which is one of the leading causes of condor chick mortality.

In the Valley management area, oil/gas development occurs in the Cuyama Valley, around the Carrizo Plain, and on other lands throughout the management area. Many of the BLM lands here provide habitat for federally listed plants and animals, and it is important to ensure that oil exploration and development is consistent with the recovery of these species.

Oil and natural gas development is an extremely intensive process, requiring a complex network of access roads, pipelines, storage tanks, thumper trucks, transmission lines, and other infrastructure. These activities, if not properly managed, can destroy wildlife habitat, fragment plant and animal populations, and increase erosion. Oil/gas development can also release oil, wastewater, and toxic materials into the environment, impacting wildlife, plant communities, and water supplies. Oil and gas extraction in such close proximity to other public lands, such as the LPNF, the Carrizo Plain National Monument, and the Hopper Mountain and Bitter Creek National Wildlife Refuges, is also not compatible with the recreation, wildlife, and wilderness qualities of these areas.

Given the heavy impacts of oil/gas development on the environment, especially sensitive plants and animals, we hope that the revised Caliente RMP will include diminished resource extraction on public lands throughout the Coast and Valley management areas, especially in

sensitive habitats. We provide the following specific recommendations for improving management of oil/gas development on BLM public lands in the Coast and Valley management areas. The revised Caliente RMP should:

- Thoroughly evaluate the impacts of oil and gas development and associated infrastructure on rare plants and animals, focusing on particularly susceptible species like the San Joaquin kit fox, the giant kangaroo rat, the blunt-nosed leopard lizard, and the California condor.
- Consider not issuing any new oil and gas leases in ecologically sensitive areas, including all Areas of Critical Environmental Concern (ACECs), and lands adjacent to sensitive habitat and existing reserves, such as LPNF, Carrizo Plain National Monument, the Bitter Creek and Hopper Mountain National Wildlife Refuges, and the Wind Wolves Preserve.
- Change the Management Prescriptions for all ACECs so that all ACECs are closed to leasing for oil, gas, and geothermal development.
- Require the evaluation and update of existing oil and gas leases with the latest biological information, and allow leases to expire in ecologically sensitive areas, again without renewing those leases or issuing new ones.
- Consider placing NSO stipulations on lands within habitat for rare, threatened, or endangered species.
- Prohibit new oil/gas or solid mineral leases on sensitive habitat, including all ACECs, and encourage the transfer of private mineral rights away from sensitive habitat.
- Contain guidelines for public notification of oil lease sales to interested parties, including surface landowners, nearby landowners, conservation organizations, and other interested parties. We recommend that BLM require notice to the surface landowner far in advance of all oil and gas lease sales involving split estates. Proactively work with landowners in the Rangeview Ranch area (adjacent to the LPNF and the Bitter Creek National Wildlife Refuge) to merge the surface and mineral estates with the surface owners.
- Require regular inspection of all pipelines, storage tanks, and other infrastructure, including preparation of an annual monitoring report summarizing the results of such monitoring and identifying any necessary corrective actions.
- Inspect and evaluate all pipelines located in riparian areas or other environmentally sensitive areas to determine whether relocation, replacement, or other modifications would increase the effectiveness of spill prevention.
- Consider trading or purchasing existing oil/gas leases and/or mineral rights in environmentally sensitive habitat, or encouraging voluntary retirement of these leases by the lease holders.
- Require consistent and regular monitoring and enforcement of all oil or gas development that continues in sensitive habitat.
- Ensure the prompt and complete abandonment of oil/gas wells and associated infrastructure.
- Require oil and gas wells and supporting facilities to be cleaned of all trash, including microtrash to reduce impacts to California condors. Establish a monitoring and enforcement plan to keep the Sespe Oil Field free of microtrash.
- Outline specific measures to prevent spills of oil, wastewater, and other toxic materials in waterways and other environmentally sensitive areas. Evaluate the risk

- of spills of oil, wastewater, and other hazardous toxins in areas where oil development is allowed to continue.
- Require all oil and gas operators to promptly report all incidents involving California condors to the U.S. Fish and Wildlife Service and to the BLM.
  - Update the Reasonably Foreseeable Development Scenario for the Caliente RMP based on current economic and geologic trends.

### ***Livestock Grazing***

Lands in the Coast and Valley management areas are used for commercial livestock grazing. Proper management of livestock grazing areas is essential to prevent overgrazing (particularly in riparian and wetland areas), the spread of invasive species, and trampling or grazing of rare and sensitive plant species. We hope that the revised Caliente RMP will include improved management of all grazing leases on BLM lands to prevent overgrazing and restore sensitive habitat and plant and animal species, as well as termination of grazing leases in the most sensitive of habitats. Specifically, the Caliente RMP should:

- Conduct a thorough analysis of the baseline conditions and existing effects of current grazing activities on habitat and wildlife.
- Evaluate the effects of livestock grazing on native plants and animals, water quality and quantity, wilderness values, Native American sacred sites, recreation, soils, invasive species, and the availability of forage for other wildlife.
- Consider retiring or terminating grazing leases on all ACECs (with the exception of using cattle to manage invasive species) once existing leases expire.
- In determining which lands to make available, or to not make available, for livestock grazing, assess the impacts of existing or new livestock grazing on sensitive wildlife and habitat and make adjustments to availability, season of use, and stocking levels as appropriate. Update the evaluation of existing leases based on current biological information.
- Require improved management of livestock grazing on existing leases, including increasing monitoring of rangeland conditions to prevent overgrazing and protect riparian habitat.
- Consider management measures such as fencing around riparian areas to prevent cattle from grazing in these sensitive areas and restricting grazing in habitat for rare, threatened, and endangered species. Evaluate the effects of fencing on migration ability and behaviors of other large mammals, including pronghorn antelope.

### ***Recreation***

Lands in the Valley and Coast management areas have the potential for abundant recreation opportunities, such as hiking, horseback riding, scenic driving, fishing and hunting, and other uses. Many of these opportunities have not yet been realized, however, because access is blocked by neighboring private lands, while still others are in need of stronger management to minimize impacts to sensitive species and habitat. We provide the following recommendations regarding recreation in these management areas, which focus primarily on improving public access and allowing low impact recreation, while continuing protection of wildlife, sensitive habitat, and riparian areas on BLM lands. The revised Caliente RMP should:

- Continue the improvement of recreation opportunities started with the 1996 Caliente RMP, especially on lands adjacent to other public lands, such as LPNF and Carrizo Plain National Monument, including increasing public access where appropriate and minimizing its effects.
- Evaluate high-impact recreation activities such as off-road vehicle (ORV) use to determine their compatibility with habitat and wildlife values as well as quiet recreation opportunities.
- Limit ORV use to those habitats that are not sensitive to disturbance, and away from other uses, such as hiking, mountain biking, and horseback riding, which are likewise not compatible with ORVs.
- Manage other uses such as hunting as appropriate for the wildlife and other recreational uses, especially on lands adjacent to sensitive habitat or existing reserves.
- Continue existing measures to protect habitat, such as limiting access and restricting hunting, camping, or equestrian use where these uses would impact sensitive species and habitat.
- Restrict future road building and evaluate the decommissioning of roads that no longer serve a useful purpose.

### ***Cultural Resources***

The lands found in the Coast and Valley management areas once supported a large indigenous population, with various tribes and cultures that traded across the landscape from the desert to the coast. These civilizations left behind artifacts, ceremonial sites (many of which are still used today by native peoples), and other treasures that teach us about their different cultures and how they live with the land. Their ancestors live on in the form of the Chumash and other native peoples found here in Central California, and these places are sacred to them. Out of respect to their beliefs and the importance of these historical artifacts, BLM has historically recognized both “cultural properties” (e.g., archaeological sites and “associated material remains”) and “traditional lifeway values” (e.g., land features and other natural resources that have “traditional values or ceremonial associations”) as needing and deserving of protection. Both cultural properties and traditional lifeway values continue to dwindle in the face of modernization and development of urban centers throughout Central California, and protection of these treasures is needed now more than ever. The revised Caliente RMP should:

- Strengthen protections for both cultural properties and traditional lifeway values across public lands.
- Consider limiting access to these resources where necessary, including steps to prevent theft and damage. Access should be allowed where public use causes minimal impact, but protecting the integrity of these resources should be the primary goal for these resources.
- Evaluate restoration of these resources where appropriate, and the acquisition of private lands that contain these resources.

## ***Biological Resources***

BLM public lands constitute a significant portion of the lands in the Coast and Valley management areas of the Caliente Resource Area, and contain habitat that support a number of rare, threatened, and endangered plants and wildlife. In the Coast management area, BLM lands are found adjacent to the Sespe Condor Sanctuary and the Hopper Mountain National Wildlife Refuge, and are used by the endangered California condor. In the Valley management area BLM lands provide some of the last remaining refuges for rare plants and animals that were once common throughout the San Joaquin Valley, including at least five plant species and six animal species that are Federally listed as threatened or endangered. The rapid urban and agricultural expansion in the San Joaquin Valley, coupled with a void of other protected lands in the area, is continuing to threaten their existence.

BLM lands must be managed above all else for maintaining habitat for and populations of these rare, threatened, and endangered plant and animal species. The revised Caliente RMP should:

- Increase protections for biological resources throughout the Coast and Valley management areas, focusing first on lands with habitat for the most sensitive of species, followed by lands that provide habitat adjacent to other public lands and can provide wildlife corridors to and from various habitat types and food and other resources.
- Consider additional designations of ACECs, SMAs, and WSAs across public lands in the Coast and Valley management areas.
- Improve coordination and management across public-private boundaries, including working with private land owners to restore lands adjacent to BLM lands, to increase the habitat and range of sensitive species most heavily impacted by surrounding land uses.
- Improve management of those lands currently covered under designation as ACECs and SMAs, including using every tool at BLM's disposal to increase native habitat, remove invasive species, reintroduce species where they have been extirpated, and otherwise restore and improve native plant and animal communities.
- Require development of management plans for each ACEC, SMA, and WSA.
- Consider other management measures such as using fire where fire has been a natural component of the system but has been removed, to restore native grasslands and wildlife habitat, as well as building artificial dens for endangered burrowing animals where such burrowing habitat has been eliminated, and/or using other methods as necessary to increase the populations of rare, threatened, and endangered species.
- Establish standards and guidelines for the protection and recovery of historic and current habitat for the California condor, including adequate buffers around historic and active nesting sites, roosting sites, and foraging sites. Evaluate the reintroduction of other wildlife, such as pronghorn antelope and Tule elk.
- Require retrofit of power lines with anti-perching devices to deter condors, or even move power lines underground in areas frequented by the condor.
- Prohibit the use of lead ammunition on any BLM lands, as consumption of lead bullets is one of the leading causes of death in adult condors.

## *Air Quality Management*

Air quality in the Coast and Valley management areas is degrading as the areas become more urbanized. To decrease air pollutants from BLM lands the revised Caliente RMP should:

- Reduce emissions from oil and gas development.
- Evaluate the appropriate use of prescribed fire on BLM lands as a tool to restore native habitat where fire is a needed part of the ecosystem but has been excluded.
- Consider that in some cases, fire can also be damaging to ecosystems if overused, particularly in ecosystems such as chaparral, which does not respond well to frequent fire, and use prescribed fire only where studies have found it benefits the native plant and animal communities, and restrict it where studies have found it harms the native ecosystems
- Address the additional air pollutants generated in any prescribed burns and manage these burns with the appropriate Air Pollution Control Districts.
- Manage lands to alleviate risk of wildfire and associated air pollutants on public lands and on adjacent private lands, including using prescribed fire when deemed appropriate.
- Include an appropriate fire management plan for BLM lands.

## *ACECs/SMA*s

The 1996 Caliente RMP identifies fifteen Areas of Critical Environmental Concern (ACECs) encompassing 238,800 acres. These areas are recognized as needing special management attention to “protect and prevent irreparable damage to important historic, cultural, and scenic values, fish, or wildlife resources or other natural systems or processes; or to protect human life and safety from natural hazards.” The 1996 RMP also identifies fourteen Special Management Areas (SMAs), areas which “have special management concerns or needs but did not warrant ACEC designation.” These designations are critical to protection of wildlife and habitat resources on BLM lands in the Coast and Valley management areas, and thus should be maintained. The revised Caliente RMP should:

- Maintain all current ACECs, WSAs, and SMAs.
- Evaluate the expansion and addition of new ACECs, WSAs, and SMAs in the Coast and Valley management areas.
- In particular, consider lands in the upper Cuyama Valley for protections under ACECs, WSAs, and SMAs, as this area has been identified by the U.S. Forest Service as an “Area of High Ecological Significance” (Stephenson and Calcarone 1999, <http://www.fs.fed.us/psw/publications/documents/gtr-172/gtr-172-ch7.pdf>). The Cuyama Valley has also been identified as an Important Bird Area (IBA) by the National Audubon Society, contains viable habitat for endangered species such as the giant kangaroo rat, blunt-nosed leopard lizard, and San Joaquin kit fox, and represents a unique ecosystem influenced by surrounding Central Valley, Mojave Desert, and coastal habitats.
- Consider other areas for enhanced protection, including lands adjacent to Carrizo Plain National Monument, within the Wind Wolves Preserve, around the Bitter Creek National Wildlife Refuge, and near the LPNF. Improved protections in these areas

would provide wildlife corridors to and from these existing reserves, as well as increase habitat available to wildlife in an area that is seeing ever increasing conversion to urban and agricultural uses.

### ***Land Tenure***

BLM lands throughout the Coast and Valley management areas of the Caliente Resource Area are highly fragmented, as they are the last remnants of Federally-owned lands in this region, which were not either homesteaded or designated under other Federal protections, such as National Parks, National Forest, or Department of Defense lands. This fragmentation has a profound impact on wildlife, as private lands adjacent to these fragmented public lands have for the most part been developed for either urban or agricultural uses; they are utilized for livestock grazing and/or oil or natural gas extraction, have been converted to vineyards or other crops, or are part of urban development projects. Additionally, this fragmentation makes management of these lands, including restoration of native wildlife and plant populations, difficult. To alleviate these difficulties BLM has several options, including transferring lands to other jurisdictions (i.e., making those lands part of national forests, parks, etc.), trading public lands for private lands in other areas, purchasing private lands adjacent to these remaining public lands, or working with private landowners to improve management across the landscape.

We support all these measures to improve management of these fragmented BLM lands. Private land acquisitions, transfers, and consolidation with public lands could create wildlife corridors, increase the range of rare, threatened, and endangered species, and in general assist in the restoration of native landscapes. The revised Caliente RMP should:

- Consider the transfer of BLM lands to adjacent areas such as LPNF, Carrizo Plain National Monument, and the Bitter Creek and Hopper Mountain National Wildlife Refuges, in order to consolidate jurisdiction, improve management efficiency, and increase protections for rare wildlife.
- Work to acquire lands in ecologically sensitive areas such as the Cuyama Valley, or engage in other land exchanges as appropriate to increase protections for rare, threatened, and endangered plants and wildlife found in these areas.

### **Final Thoughts**

In this letter we have provided recommendations on specific issues that we would like to see addressed in the revised Caliente RMP as they pertain to our mission to protect and restore public lands along California's Central Coast. In general we would like to see increased protections for habitat and wildlife, increased oversight of oil and gas development, improved management of rangelands and livestock grazing, increased recreation opportunities, increased protection and restoration of cultural and biological resources, and a plan for managing fire to benefit these resources while minimizing air pollution on public lands.

We hope BLM will consider these concerns as it develops the revised Caliente RMP and look forward to providing more specific comments on the draft RMP when it is completed. Please send us additional information, including future notices and environmental documents, as this process moves forward. Thank you very much for considering our comments and concerns.

Sincerely,

Zack Bradford  
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