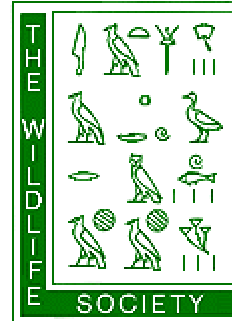


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June 17, 2003

Santa Rosa and San Jacinto Mountains National Monument Manager
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Subject: The Western Section of The Wildlife Society Comments on the Draft Environmental Impact Statement for the Land and Resource Management Plan for the Santa Rosa and San Jacinto Mountains National Monument

The Wildlife Society is an international organization comprising professional wildlife biologists employed in the private and public sectors, natural resource management agencies, and academia. The Western Section of The Wildlife Society (TWS–WS) currently consists of about 1,000 members in nine chapters in California, Nevada, Hawaii, and the Pacific Islands. TWS–WS members include field biologists, wildlife managers, and policymakers from a broad range of disciplines who are regularly engaged in resolving land use and conservation issues stemming from impacts on wildlife and the habitats on which they depend.

Our goal is to enhance the capability of wildlife professionals in conserving natural diversity, sustaining productivity, and ensuring responsible use of wildlife resources for society's benefit. The principal objectives of The Wildlife Society are developing and promoting sound stewardship of wildlife resources and of the environments on which wildlife and humans depend, taking an active role in preventing human-induced environmental degradation, increasing awareness and appreciation of wildlife values, and seeking the highest standards in all activities of the wildlife profession.

We commend the Bureau of Land Management (BLM) and the U.S. Forest Service (USFS) for developing a management plan for the Santa Rosa and San Jacinto Mountains National Monument in such a timely manner. We are submitting the following comments on the “Draft Environmental Impact Statement (DEIS) for the Santa Rosa and San Jacinto Mountains National Monument Management Plan” and hope that these comments are helpful in the development of a final plan.

Section 2.B.1. Management of Biological Resources

1. *Management of Peninsular Ranges Bighorn Sheep*

The DEIS states that "...the CDCA Plan Amendment for the Coachella Valley outlines measures that the BLM will follow to protect and promote the recovery of Peninsular Ranges bighorn sheep in the Monument..." (page 2-5). We suggest that the final plan include language that all actions undertaken by the BLM and the USFS will be consistent with the goals and objectives of the recovery plan for bighorn sheep.

2. *Management of Noxious, Non-Native, and Invasive Plant Species*

The Preferred Plan in the DEIS stipulates that the "...BLM and USFS would seek partnership opportunities to enhance current efforts [to manage invasive plant species]" (page 2-5). We recommend that the BLM and USFS fund and implement their own proactive monitoring and eradication programs rather than relying on current efforts and the possibility of future partnerships.

3. *Management of Special-Status Species*

Again, we recommend that the BLM and USFS fund and implement their own plant and animal inventories as a primary means of gathering data. This effort could then be augmented by "...working with partner agencies, Tribes, and volunteer groups to update existing inventories..." (page 2-7). The DEIS does not describe the scope, quality, or frequency of existing inventories or whether these inventories currently include all special-status species. In addition, status designations may change and the DEIS should account for possible changes and require appropriate inventory and focused survey efforts for all special status species.

4. *Monitoring Program*

The Preferred Plan's monitoring program described in the DEIS suggests a lack of commitment on the part of BLM and USFS to develop a comprehensive, Monument-wide monitoring program for biological resources. The Preferred Plan states that the BLM and USFS will "...continue to participate in the development of an interagency monitoring program..." and "...continue to coordinate the implementation of the interagency monitoring program..." and "...work with partner agencies to coordinate monitoring..." (page 2-7). As described above, we recommend that the final plan mandate a stand-alone surveying and monitoring program for the Monument to complement and expand upon ongoing efforts while ensuring no resource monitoring gaps.

2.B.3. Management of Recreational Resources

1. *Non-Motorized Recreation*

Camping should be prohibited in critical and essential bighorn sheep habitat (page 2-16). In addition, hang gliding over bighorn sheep habitat has the potential to harass or disrupt sheep and should be prohibited. We support Alternative C with regards to hang gliding activities (page 2-17) because it would disallow hang gliding launches from, and landing on, BLM or USFS lands within the Monument, including Vista Point, and thus ensure no harassment or disruption of the bighorn sheep in the vicinity. . Hang gliders must land on Bighorn Institute property or the state ecological reserve if they are launching from the Vista Point site potentially disturbing or harassing sheep in the Bighorn Institute captive breeding and lambing facility.

2. *Pets*

Within essential bighorn sheep habitat, dogs should be managed in accordance with existing closure order and recovery plan recommendations, as well the bighorn sheep strategy described in BLM's CDCA Plan Amendment for the Coachella Valley (page 2-19).

The Preferred Plan states that leashed dogs would be allowed in designated areas including the visitor center (page 2-19). The Monument visitor center on Highway 74 is located in essential bighorn sheep habitat and adjacent to the Bighorn Institute, and therefore dogs should be prohibited in that location. In addition, the Preferred Plan notes that other sites may be designated following the completion of a trails plan.

The most recent trails plan proposes to allow dogs in essential bighorn sheep habitat, which is inconsistent with recovery of bighorn sheep and inconsistent with management of large mammals. Finally, the Preferred Plan would allow authorized, but unleashed, working dogs (page 2-20) outside of essential bighorn sheep habitat. Please clarify whether this includes hunting dogs.

Overall, we recommend that the final plan prohibit dogs completely -- working, hunting, or otherwise -- in all essential and critical bighorn sheep habitat throughout the entire Monument.

3. *Feral and Uncontrolled Domestic Animals*

The Preferred Plan would establish a protocol to "address" feral and uncontrolled domestic animals (page 2-20). We suggest the establishment and implementation of a protocol to control and manage these animals. The plan should address methods for discouraging abandonment and prohibiting creation or support of human-supported feral animal colonies.

4. *USFS Adventure Pass*

We encourage the adoption of Alternative C with regard to the Adventure Pass fee on both USFS and BLM lands within the Monument (page 2-21). These Adventure Pass fees could fund biological resource inventory and monitoring programs.

5. *Strategic Recreation Management Plan*

We recommend adding language stating that the Strategic Recreation Management Plan be consistent with the bighorn sheep recovery plan and the Sikes Act (page 2-22).

2.B.6. Management of Scientific Resources

The Preferred Plan requires maintenance of current spatial data in the form of Geographic Information System (GIS) coverages or layers as part of (page 2-27). We wholeheartedly support this approach; however, the DEIS should describe the scope and extent of current and target data, their intended use, availability of metadata, and data limitations. The DEIS should also describe data validation methods and provide an assessment of data quality and scale.

The Preferred Plan stipulates that permits would be required for research activities in the National Monument. The Plan states the intent of the permit requirement is to monitor data collection activities (page 2-27). Please clarify this issue with respect to state and federal wildlife resource agency access to Monument lands.

2.B.8 Management of Visitation, Facilities, Safety, and Uses

1. *Fire Plan*

The Preferred Plan states that the BLM and USFS will "...address established vegetation and species-based needs for fire management throughout the National Monument..." (page 2-31). We recommend that the final plan explicitly require the implementation of fire management to meet the needs of target species.

2.B.9. Management of Water Resources

The Preferred Plan states that the BLM and USFS will coordinate with other entities to "...enhance current efforts to manage surface and ground water..." by several actions (page 2-33). As suggested above in our comments on Management of Biological Resources, we recommend that the BLM and USFS fund and implement their own inventories of surface water and groundwater resources rather than relying on current efforts and partnerships. In addition, we suggest that the BLM and USFS develop and implement their own program to eradicate tamarisk, fountain grass, oleander, and other invasive species in the Monument.

2.B.10. Acquisition Strategy

We suggest including consistency with the Sikes Act to the criteria list for the BLM and USFS acquisition process (page 2-34).

2.C.1 Adaptive Management and Monitoring - Implementing the Plan

The Preferred Plan states that the BLM and USFS will "...facilitate the development of a Technical Review Team to include all partners such as Palm Springs Aerial Tramway, California State Parks, Tribal Administrators, State and Federal land representatives, to implement strategies resulting from the National Monument Management Plan." (page 2-35), and will "...coordinate monitoring of resources..." and "...prioritize monitoring of resources to address those associated with highest levels of threat..." (page 2-36). Section 2.C.2 notes that the final plan will also be updated with regards to the Coachella Valley Multiple Species Habitat Conservation Plan's Trails Management Plan and the Forest Plan Revision process (page 2-36).

The "adaptive management" section of the Plan contains no actual provisions or mechanisms for true adaptive management. Adaptive management means allowing ongoing monitoring and research results to guide future management actions. In other words, adaptive management is specifically data-driven rather than simply including provisions from pending plans.

The final Plan should require that the data obtained from surveys and monitoring, as well as scientific research, be examined on a regular basis by a Technical Review Team, and that subsequent management actions be revised to reflect the data. In addition, the Technical Review Team should include scientists whose job it is to monitor biological resources in the Monument, and managers with the expertise, responsibility and authority to make management decisions.

Thank you for considering these comments. Please contact me to discuss our comments, answer questions related to our recommendations, or provide technical assistance as required.

Sincerely,

Lowell Diller, President
The Wildlife Society–Western Section