

# STEWARDS OF THE SEQUOIA

Non Profit 501c3  
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March 15, 2019

BLM Bishop Field Office  
351 Pacu Lane, Suite 100  
Bishop, CA 93514  
Att. Sherri Lisius, Supervisory Resource Management Specialist

Re: Scoping Comments for Alabama Hills land use plan

Dear Ms. Lisius and BLM Planners,  
Please consider this comment as you prepare your draft land use plan for the Alabama Hills and include our comment in the public record.

Stewards of the Sequoia are the largest on the ground volunteer trail maintenance organization in Sequoia National Forest and surrounding BLM lands since 2004. We are a public lands stakeholder, whose mission is to promote responsible recreation. We have over 3000 members who enjoy all forms of recreation. Many of our members have enjoyed dispersed primitive camping, driving, hiking and rock climbing in the Alabama Hills Recreation Area for decades.

## MANAGEMENT DESIGNATION

The recent change of the Alabama Hills Special Recreation Management Area to a National Scenic Area should not cause the BLM to restrict recreation uses. The BLM has not shown any negative impact from recreation that could not be mitigated with maintenance such as proposed in this comment letter.

For Alabama Hills the National Scenic Act states-

*"(b) PURPOSE.—The purpose of the Scenic Area is to conserve, protect, and enhance for the benefit, use, and enjoyment of present and future generations the nationally significant scenic, cultural, geological, educational, biological, historical, recreational, cinematographic, and scientific resources of the Scenic Area managed consistent with section 302(a) of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1732(a))."*

AND

*"shall allow existing recreational uses of the Scenic Area to continue"*

## PRESERVE RECREATION OPPORTUNITIES

We feel the Act encourages and requires the BLM to continue providing dispersed primitive camping recreation. Alabama Hills has a long history of recreation use by vehicles, camping and rock climbing, as well as movie making, which the Act seeks "to protect and enhance". It would not be appropriate to restrict, eliminate or discourage the very historic uses the area is famous for, and which the public desires, such as dispersed primitive camping among the boulders as well as vehicular access. The local economy depends on the income generated by this recreation.

According to the current Bishop BLM Resource Management Plan (RMP) upon which all management decisions are based, the BLM must "*Manage the Alabama Hills SRMA to protect unique geologic features and scenic values and to provide compatible recreational opportunities.*"

We would point out that in the scenic value and geology of Alabama Hills remain intact after more than 100 years of recreation in the area.

The RMP also states for Alabama Hills that the BLM must "***Manage the resource area to provide for a variety of dispersed recreation opportunities. Emphasize primitive, semi-primitive motorized, semi-primitive nonmotorized and roaded natural experiences. Maintain and enhance semi-primitive and other physical settings by providing compatible recreation opportunities within those settings.***"

We feel the intent of the RMP and the National Scenic Act includes protecting existing and historic dispersed primitive camping, and to enhance or expand it as needed for a growing population.

We see no justification for increased restrictions on dispersed primitive camping. Yet the BLM appears to be increasing restrictions on the area. We feel this is not appropriate or in keeping with the RMP of the Scenic Act, and encourage the BLM instead to manage to meet increased demand. We urge the BLM to preserve recreation opportunities, since that is what is most at risk and most sought, so a growing population can enjoy the same kind of dispersed recreation that people have been enjoying for decades at Alabama Hills.

Alabama Hills just needs some basic maintenance management as we propose below.

### **1- VEGETATION MANAGEMENT**

We assume the BLM is concerned with the expansion of camping areas and the associated loss of vegetation, based on our observations of numerous areas in Alabama Hills where the BLM has replanted or vertical mulched areas.

Has the BLM done a comparison of actual denuded area to vegetated areas? If so what are the results? If not we suggest the BLM take a look at this. We would point out that the amount of vegetation lost due to expansion of dispersed camping areas is extremely minimal compared to the total vegetation area in the Alabama Hill National Scenic Area and surrounding desert lands. This minimal loss of vegetation due to parking area and dispersed camping expansion should be considered normal resource impact for the recreation area.

The BLM has replanted areas in Alabama Hills, some with less success than others.

- We would point out that turn arounds have been expanded to allow for the turning radius of current recreational vehicles and that attempts to reduce the size of turn arounds below the space needed for current vehicle use will most likely be a waste of time. We feel the BLM should focus replanting efforts, or rock borders, in areas where they are more likely to succeed and where they are not removing needed parking or turning space or dispersed camping space.
- For example there are existing parallel roads which are not of much use that could be easily replanted that would greatly increase vegetation areas, and would likely be complied with by the public.

- We would also suggest the BLM not keep replanting areas if cars keep driving over them. This will help the BLM avoid wasting resources on projects that will not work, and better focus resources on projects that work.
- With the increase in visitation there is a need to expand parking areas in some places and the public has done this by parking in the area or driving the turnaround area. We would point out that this expansion is minimal in terms of percentage of vegetation in the area and should be considered as normal resource impact for a recreation area.

## **2- DISPERSED CAMPING NEEDED**

Alabama Hills has historically been popular for dispersed camping and this trend continues. Today this backcountry camping culture is evident in Alabama Hills. Many people desire to camp separately from others, unlike camping in a developed campground.

- It is clear the public desire the dispersed camping offered in Alabama Hills in such a scenic setting. It should be noted that Alabama Hills is one of the few places where this type of scenic dispersed camping is available, making it extremely valuable for that purpose. We feel the BLM should continue to allow dispersed camping in the existing areas.
- With increased dispersed camping use the BLM should be looking at how to increase dispersed camping areas instead of restricting them. The BLM needs to manage in order to provide the uses the public are looking for, rather than restricting those uses.

## **3- OLD WAGON ROAD DISPERSED CAMP**

Over the past several years we have witnessed closures of dispersed camping areas in Alabama Hills. This is most troublesome.

- For example one camp spot the BLM has been closing is by Old Wagon Road (shown below). This camping spot is surrounded by rock, so it is naturally prevented from expansion, making it ideal for keeping the camp spot within the space allotted. There is also a fire ring in this camp spot. According to the Bishop BLM RMP "*Unimproved camping areas, consisting of a cleared area with a rock fire ring, are located along access roads.*" So this camp spot is a valid and legal dispersed camping area. Yet the BLM has placed a number of unsightly signs along the road prohibiting users from camping in this area. The camp spot is only perhaps 20 feet square. This billboard effect of signs is probably far more objectionable to most people than the lack of vegetation in the camp spot.
- Instead of closing this camp spot, we would suggest closing 300 feet the parallel Old Wagon Road that leads to this campsite. Then reopen a short connector of five feet to the campsite from the other road. The Old Wagon Road is 10-11 feet wide so closing 300 feet of it would provide a net gain of about 3000 square feet of vegetation, addressing the BLM desire for more vegetation, while continuing to provide the dispersed campsite that the public clearly desires. If needed an additional 40 feet of Old Wagon Road could be revegetated for an additional 400 square feet of vegetation area. These two areas offer far more square feet of vegetation than all the other replanting efforts that the BLM has done to date.



Perfect Camp Spot Closed & Too Many Ugly Signs

#### **4- MOVIE FLAT ROAD WIDTH**

While the BLM has been restricting a couple of feet here and there in dispersed camping and parking areas, we notice the BLM has been grading Movie Road to 28 feet wide. That is far wider than a two lane highway and would seem excessive.

- If increased vegetation is sought after, then perhaps the BLM should replant six to eight foot borders of Movie Flat Road for many miles. This could result in hundreds of thousands of square feet of increased vegetation, far more than closing all dispersed camping areas.
- It appears that prior efforts to replant may have failed due to not watering the plantings. If the BLM invests in future replanting we would suggest they get serious and commit to watering the plantings with a water truck during hot times of year until established. Horse dung could be used as a fertilizer to speed growth and establishment.
- Encourage the public to help with small educational signs in parking lots explaining the plantings and urging them to dump water bottles at the end of the day onto plantings

#### **5- HUMAN WASTE**

The BLM has installed some toilets at the popular climbing parking areas.

- However if human waste is an issue for parking areas and dispersed camping, then the BLM should consider only allowing dispersed campers who have a portable camping toilet or self contained RV's. The Rubicon 4x4 trail offers an example of how this can be done.

## 6- PROBLEMS WITH PUSHING CAMPERS TO TURTLE CAMPGROUND

There appears to be a push by the BLM to discourage, reduce or eliminate dispersed camping and replace it with camping at the Turtle Campground. There are several problems with this-

- The Turtle Campground is several miles away from the scenic area of Alabama hills and not where people want to camp.
- Camping at Turtle Campground will cause campers to drive each day, or even several times a day, from the Turtle Campground to the Alabama Hills area five miles away increasing dust production, reducing user satisfaction and producing negative environmental impacts . More driving to and from Turtle Campground will also increase greenhouse gas emissions and waste fuel.
- Increased congestion and traffic on the five miles of roads from Alabama Hills primary area to Turtle Campground , causing an increased safety hazard and increased costly road maintenance on both BLM Movie Flat Road as well as County roads. Has the BLM informed local residents and the county about this as well as the increase in traffic due to pushing the public into Turtle Campground?
- Perhaps most importantly most of the public does not want to camp in the Turtle campground field, they want to be among the scenic rocks of Alabama Hills where the dispersed camping is located. For example on several visits to Alabama Hills almost all the dispersed primitive sites were taken, while there were very few people camping at Turtle Campground.
- Has the BLM done a traffic study for the area? If not we would suggest it does to compare the impacts of restricting dispersed camping and the increased travel required when using the Turtle Campground.
- We suggest removing the numerous dead stop speed bumps at Tuttle Creek campground as they are most inconvenient for camper RV's and trailers and will cause increased congestion especially if the campground is ever more used. The BLM should replace them with speed bumps that allow low continuous speeds.
- We found the water turned off at Turtle Campground unexpectedly. Other campers said it is common for the water to be turned off. The BLM should strive to keep the water turned on. Perhaps the Camp Host should be able to turn off the water if needed to be able to keep it on more often.
- Reopen dump station by lower info kiosk in order to allow users to easily dump when leaving Alabama Hills, rather than having to drive in the other direction into Turtle Creek Campground. If needed the dump station at Turtle Creek could be closed since everyone passes by the one at the kiosk when leaving.

We look forward to the BLM's response to the questions and suggestions raised in the comment letter.

Thank you for this opportunity to comment and help the BLM to develop the BLM Alabama Hills Plan.

Sincerely,

Chris Horgan  
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Stewards of the Sequoia  
Division of CTUC 501c3 non profit  
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CC: Congressman Jerry McNerney  
Assembleblymember Devon Mathis  
Inyo County Board of Supervisors  
Lone Pine Chamber of Commerce  
Alabama Hills Stewardship Group

*"Since being founded in 2004, Stewards of the Sequoia continues to be the largest on-the-ground organization of volunteers in the Sequoia National Forest. Our crews have maintained over 3000 miles of trails and have planted hundreds of trees in reforestation projects. We represent in excess of 3000 members whose activities include camping, hunting, fishing, hiking, mountain biking, motorized recreation, boating, windsurfing, rock climbing and horse riding"*

Promoting Responsible Recreation & Environmental Stewardship