

STEWARDS OF THE SEQUOIA

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Pocatello, ID 83202-0003

August 7, 2020

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

Re: Comments for Alabama Hills Draft EA land use plan

Dear Ms. Lisius and BLM Planners,

Please consider this comment as you prepare you revise your revise the EA 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.

BlueRibbon Coalition/ShareTrails is a national non-profit organization that champions responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands and waters for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with natural resource managers and other recreationists. We represent over 700,000 outdoor recreationists in all 50 states.

DISPERSED CAMPING

The BLM knows the public wants to disperse camp in all existing sites as they have been for many decades. The BLM also heard this in scoping and know that dispersed camping use has been increasing. Yet there is no alternative proposed action to allow all existing dispersed camping to continue. Instead both proposals greatly restrict or eliminate dispersed camping.

BLM staff have told us the No Action Alternative is the one that would allow all dispersed camping to continue. However the No Action Alternative is rarely chosen. Also the No Action Alternative MAP 2 is titled No Action Dispersed Camping Inventory which does not sound like a proposed action. We feel the No Action Alternative is not a proposed action and does not fairly represent a proposal for continued dispersed camping in all sites.

We are not aware of any policy that would prohibit any existing dispersed camping. We do not see where the EA has shown this to be the case. As a matter of fact Title XIV of the Dingell Act (Public Law 116-9, 16 USC 460fff *et seq.*) as cited in the EA requires that::

1. The BLM shall manage the area to enhance recreation.
2. The BLM shall allow existing recreational uses of the Scenic Area to continue.

It appears that the intent of Congress is for all existing dispersed recreation camping sites be kept open. Instead of restricting recreation such as dispersed camping. BLM should first adopt adaptive management strategies to enhance the recreation experience such as by installing porta potties as outlined in this comment. It is clear the purpose of the Dingell Act was not to restrict or reduce any recreation activity, instead the BLM must enhance them in keeping with the Act.

Both Alternative 1 and Alternative 2 clearly diminish recreation opportunity which is not in keeping with the Dingell Act. The BLM needs to remove Alternative 1 and Alternative 2, since they do not comply with the Act and create a new Alternative such as the one described in this comment that enhances recreation and allows all existing recreational use to continue in compliance with the Dingle Act.

The BLM has identified the following Recreation Resource Features (Appendix C) which they feel complies with the Dingell Act :

- Alabama Hills Trail, which eventually ends at Mt. Whitney, the highest peak in California and the United States outside of Alaska
- Arch Loop Trail
- Tuttle Creek Campground
- Rock climbing routes
- Roads and trails

Dispersed Camping is noticeably absent from this list, but clearly is an important recreation feature as many if not most visitors come to enjoy this. Also since the Dingell Act requires allowing all existing recreation use and enhancing these recreation uses then existing dispersed camping must be added to the list of features. Since Tuttle Creek Campground is on the list it is obvious that all camping recreation opportunities should also be on the list including dispersed camping. That it is absent indicates a bias against dispersed camping that is not supported by the EA.

Historic dispersed camping should also be added to the list of Cultural Features as generations of people have enjoyed these camping spots with their families and share them with new generations in a cultural tradition. All historic cultural dispersed camping use should be protected as dispersed camping is key to the historic character of Alabama Hills.

The West Side of Movie Flat road has many of the most scenic, historic and best dispersed camping areas which are proposed for closure in both Alternatives in violation of the DIngeLL Act.

- **We urge the BLM to develop an Alternative that allows all dispersed camping sites to remain open with mitigation of porta potties and trash receptacles as needed. This alternative could also include the decommissioning of duplicate roads to address the BLM's desire to increase vegetation as included in the Stewards of Sequoia scoping letter of 3/15/19.**
- **Inevitably there is increased human waste and trash that comes along with increased use. Installing porta potties and dumpsters and trash cans should be the first step in all cases to see if this can be managed rather than reducing dispersed camping or access. We urge the BLM to do so.**

In our experience the Alabama Hills areas where human waste is more of problem is the tent camping areas since they lack self contained toilets of RV's. However if camping is prohibited these areas will still be used as parking for trailheads and most of those vehicles lack toilets so the human waste issue will continue to be an issue.

- **We think porta potties would be a better solution. To make them look better we urge the BLM to build simple wood structures on top of the porta potties once they are placed in their final locations as they have done so well in Mammoth.**

Alabama Hills is a unique area in that dispersed camping is allowed throughout a scenic area. In large part the ability to disperse camp next to rock climbing and scenic areas is the draw to the area. Visitation is increasing with most visitors dispersed camping so it appears the impacts of dispersed camping are not detracting from the visual scenic value for most people. **Therefore the visual values are already being maintained enough with the increased use and dispersed camping restrictions are not needed.**

The BLM EA is concerned about the creation of dust especially from driving on Movie Flat Road.

- **The BLM must consider that by reducing dispersed camping they will be vastly increasing travel and the associated dust when visitors are forced to camp away from the scenic area and travel up and down Movie Flat Road each day going to and from the campgrounds outside Alabama Hills area.**
- **The BLM must also consider the increase in exhaust emissions and greenhouse gases due to visitors having to drive from campgrounds each day due to reduction or elimination of dispersed camping.**
- **The BLM must also consider traffic safety issues they will create by forcing visitors to travel between remote campgrounds and the scenic area they have come to see as well as increased wear and tear on county roads.**

The Draft EA represents a predetermined outcome of increased restrictions for camping and other activities. We urge the BLM to remedy this by doing the above.

DAY USE AREAS

- We urge the BLM to propose prohibiting camping at the trailhead's day use parking areas by Tall Wall and the Corridor so as to ensure parking is available for day use.

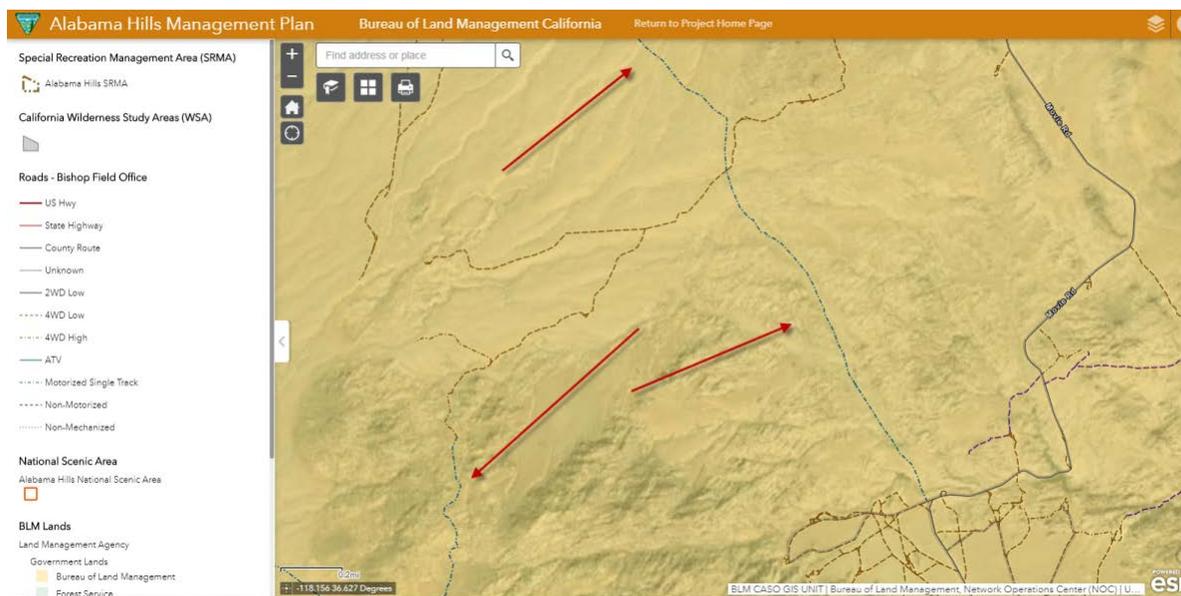
SIGNAGE

- We urge the BLM to propose signage at suitable turn around spots on side roads or on Movie Flat Road to inform drivers that certain roads are not suitable for trailers or RV's beyond a certain length.
- We urge the BLM to address sign pollution and propose a reduction in closure signs. In many cases the signs are just a few feet apart and are degrading the scenic beauty of the area.

MOTORIZED SINGLE TRACK

In talking with Ms Lisius about the existing motorized single track trail from Movie Flat Road north and to Lone Pine Campground and back to Whitney Portal Road, we have been assured that the non motorized map icon was placed by mistake on top of those motorized trails on plan Alternative Maps. We have been assured those trails will remain motorized single track and are not proposed for closure to motorized use in any alternative.

These are the only motorized single track trails in the area and should remain open to dirt bikes to continue to provide the only single track motorized experience in the Alabama Hills scenic area and to comply with the Dingle Act requirement to continue to allow all existing recreation uses.



BLM Eplanning Map showing the existing motorized single track which the BLM mistakenly marked as non motorized on Alternative Maps and is not proposing for closure to motorized use

E-Bikes

E-bikes are one of the fastest-growing segments of the outdoor recreation industry. Deloitte estimates that 130 million e-bikes will be sold between 2020 and 2023. Land management planning should take into account this growing market segment, and addressing e-bike access would be an additional way this EA could enhance recreation potential at Alabama Hills. We would suggest the EA designate E-bike use be allowed on all mountain bike and motorized trails.

GENERAL

The Draft EA does not analyze the environment or disclose what factors drive the alternative proposals. We urge the BLM to address this in the revised EA.

PUBLIC ENGAGEMENT

Lastly the BLM held two teleconferences both of which I called in to so that I could speak with staff about the Draft EA. When I used the phone number provided the recording said I would be muted unless I also logged in online in order to raise my hand to be unmuted. I confirmed this with the BLM IT tech. When I called in for the second conference I was recognized to speak by raising my hand online, but the staffer said she could not unmute me because I was on out of date version of the conference software. I do not know how this would be possible since I had just downloaded the software that day.

I think the problem is that the BLM assumes everyone will log in and use the online program speech, rather than calling in on phone line. Surely the BLM could have just unmuted my phone line. Since the BLM wants public involvement and does not want to discourage the public from being engaged I would suggest that anyone who calls in not be muted so they can take part without any effort or issues on the BLM side. We are all adults and know how to talk appropriately with many people on these calls. However should there be a case where someone is not speaking appropriately the BLM could always mute them at that time. Many people have limited bandwidth or no internet or no computer ability, allowing unmuted call in is the best way to provide the greatest public engagement and reduce discrimination.

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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Ben Burr
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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 4000 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