



Steve Nelson, Field Manager
Sherri Lisius, Assistant Field Manager
Bureau of Land Management
351 Pacu Lane, Suite 100
Bishop, CA 93514

Submitted via email: blm_ca_alabama_hills_planning@blm.gov

RE: DOI-BLM-CA-C070-2020-0001-EA

Bishop BLM Field Office and Alabama Hills Planning Team,

Thank you for the opportunity to review and submit comments on the DOI-BLM-CA-C070-2020-0001-EA for the Alabama Hills Draft Management Plan, published July 8th 2020. Please accept these comments on behalf of Friends of the Inyo and our 1,000+ members across the state of California and country.

About Friends of the Inyo & Project Background

Friends of the Inyo is a conservation non-profit 501(c)(3) based in Bishop, California. We promote the conservation of public lands ranging from the eastern slopes of Yosemite to the sands of Death Valley National Park. Founded in 1986, Friends of the Inyo has over 1,000 members and executes a variety of conservation programs ranging from interpretive hikes, trail restoration, exploratory outings, and public lands policy engagement. Over our 30-year history, FOI has become an active partner with federal land management agencies in the Eastern Sierra and California Desert, including extensive work with the Bishop BLM.

Friends of the Inyo was an integral partner in gaining the passage of S.47, or the John D. Dingell Jr. Conservation, Management, and Recreation Act, that designated the Alabama Hills as a National Scenic Area. Our board and staff have served this area for many years and have seen it change over time. With this designation comes the opportunity to address these changes and promote the conservation of the Alabama Hills. As visitation to the Alabama Hills continues to exponentially increase, we must be proactive in our management and problem-solving. It is clear that there is a need in the Alabama Hills for new and adaptive management practices that will promote the scenic values for which the area was designated and protect the historic, cultural and ecological resources of the land.

Recognition of Ancestral Homelands

Friends of the Inyo recognizes that the Alabama Hills are the traditional homeland of the Paiute people of Payahuunadu, also known as the Owens Valley. Long before European settlers arrived, the Paiute people inhabited and cared for the land. They are the true first stewards of the Alabama Hills. To this day, the Paiute people live in and steward this land. We strongly believe that the Alabama Hills plan must reflect this and set forward an understanding of collaboration between the local Lone Pine Paiute Tribe and the BLM, if the Lone Pine Paiute Tribe requests this.

Collaboration with the Alabama Hills Stewardship Group

The Alabama Hills Stewardship Group (AHSG) have long served The Alabama Hills and fought for over a decade to secure a protective designation for this area. Their board comprises of leaders in the Lone Pine community and represent a diverse range of perspectives on public lands and conservation. Friends of the Inyo strongly supports collaborative efforts between the Bishop BLM and the AHSG and suggests that the new Alabama Hills Management Plan reflects an understanding of collaboration between the two groups.

Purpose of the Scenic Area

The Dingell Act states *“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)).”*

We must consider this mandate with the numerous management challenges faced by the Alabama Hills at this time. Our comments address camping, human waste, toilets, visitation growth, impacts to the natural environment, and the future of recreation while considering, first and foremost, the scenic and conservation values for which the area was designated.

Structure of Our Comments

Our comments are organized into sections that match the Alabama Hills EA. In each section, we set forth the reasons we support each alternative. If we have issues with line items under the alternative we support, we describe those as well. If there are sections in other alternatives we deem especially appropriate or inappropriate, we make our support, or lack thereof, clear.

Precedence of the Alabama Hills National Scenic Area

The Alabama Hills are a truly unique place, rich in history and beloved by people from around the world. The scenic values and conservation features of the land can not be overstated. The area will be the first National Scenic Area managed by the BLM in the entire country. With this plan comes the opportunity to set a valuable precedent for the future of conservation in BLM managed National Scenic Areas. In this plan, scenic values and conservation must come first. Everything else, including recreation, should support the scenic and conservation values for which the Alabama Hills were designated.

Managing as National Conservation Lands

The Alabama Hills National Scenic Area and Special Recreation Area is a unit of the National Landscape Conservation System (National Conservation Lands), which includes National Monuments, National Conservation Areas and Similar Designations, Wilderness and Wilderness Study Areas, Wild and Scenic Rivers and National Historic Trails. The Alabama Hills is the first “Scenic and Special Recreation Area” in the system and falls under the ‘Similar Designations’ category, with Headwaters Forest Reserve, Steens Mountain Cooperative Management and Protection Area and Jupiter Inlet Outstanding Natural Area.

As part of the National Conservation Lands, the Alabama Hills must be managed according to a heightened set of conservation management directives and policies.

- In the 2009 Omnibus Act, congress established the National Conservation Lands to “conserve, protect, and restore nationally significant landscapes.”
- In 2010, Secretarial Order 3308 established a unified conservation vision for managing the National Conservation Lands, which stated, “the BLM shall ensure that the components of the [system] are

managed to protect the values for which they were designated, including, where appropriate, prohibiting uses that are in conflict with those values.”

- In 2011, BLM released the 15-Year Strategic Plan, setting specific goals for how to manage the National Conservation Lands focused on conservation, protection and restoration. The Strategic Plan further expanded that “there is an overarching and explicit commitment to conservation and resource protection as the primary objective” and that the BLM shall “not authorize discretionary uses that cannot be managed in a manner compatible with the designation proclamation or legislation.”
- In 2012, BLM released two relevant Policy Manuals: 6100-National Landscape Conservation System Management; and 6220-National Monuments, Conservation areas, and Similar Designations. When making management decisions BLM must use these manuals as guidance.

The 2009 Omnibus, The Secretarial Order, 15-Year Strategy and Policy Manuals make clear that agency policy prioritizes conservation over other uses within the National Conservation Lands. As the first Scenic Area in the system, it is important that the BLM ensure management plans and implementation level decisions meet heightened conservation standards. As the public’s appreciation for public lands continues to grow and evolve, units of the National Conservation Lands offer a unique experience to enjoy and recreate in nationally significant landscapes. Although a new designation, the Alabama Hills should exemplify the values of the National Conservation Lands and not be deemed different or lesser than other units of the system.

Lastly, it should be clear that The Alabama Hills, as part of the National Conservation Lands, is no longer managed under multiple-use standards as outlined in the Federal Land Policy Management Act. As stated in the 15-Year Strategic Plan for the National Conservation Lands, “The authors of FLPMA included an astute exception: Management activities must abide by [multiple-use] principles, except ‘...where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law.’ That means in some places, conservation may be elevated over development or production if a law identifies conservation as the primary use for which the land is designated.”

Recreation Management

1) Overnight Use and Camping

In alignment with the Alabama Hills Stewardship Group, Friends of the Inyo supports Alternative 2 of Overnight Use which would eliminate dispersed camping at the Alabama Hills. The Alabama Hills have been overrun by dispersed camping for decades, leading to numerous issues including human waste, destruction of vegetation, user group conflicts and more. Simply put, the land needs time to heal. Closing the Alabama Hills to dispersed camping will give Bishop BLM a distinct camping mandate to enforce while deciding if and how dispersed camping will open in the future. No matter the direction taken, we do not believe expanding Tuttle Creek to be appropriate, as the campsite rarely operates at capacity as is. The EA states “*the occupancy rate at Tuttle Creek Campground is typically below 50 % except for some holiday weekends.*” If the site is not consistently operating above half-capacity, we do not see a need to expand the site or add a new campground.

We are concerned that if dispersed camping is eliminated, people will either camp illegally in the Alabama Hills or camp elsewhere and impact sites. BLM staff and signage should direct visitors to additional underutilized nearby camping at Lone Pine CG (USFS) and Portugeuse Joe CG (county). Adaptive management responses to future use trends at Tuttle Creek CG could include expansion of that campground.

Visitors have come to know the Alabama Hills as a place for quiet, free, and spontaneous camping opportunities. Eliminating dispersed camping will completely alter people’s relationship and perception of the Alabama Hills. That being said, the land clearly needs time to heal and the Bishop BLM needs time to get

dispersed camping and its impacts under control. Alternative 2 will allow for both of these options. The Bishop BLM and the Alabama Hills plan should keep the option of re-opening dispersed camping.

If Bishop BLM selects Alternative 1 of Overnight Use, we urge consideration of a few other options for camping other than what's detailed in the draft plan. If Bishop BLM selects Alternative 1, we strongly advise that Bishop BLM adopt the permitted service mentioned in Action 1 Alternative 1 to track camping, increase the responsibility of visitors, and improve the ability to enforce violations. If dispersed camping is to stay open, we advise the Bishop BLM to consider limiting all dispersed camping to tent camping only and regulate all RV/trailer/camper vans to the Tuttle Creek campground. RVs and trailers are by far the most impactful camping option. These structures are difficult to maneuver and park, leading to damaged plants and "creeping" of sites. Large camper vans and RVs are extremely destructive to scenic values given their height and often bright colors. They are loud, take up vast amounts of space, and rut out the ground much quicker than a common vehicle.

If Bishop BLM selects Alternative 1 of Overnight Use, sites designated should be in existing disturbed areas and where other recreational uses are less likely to occur, to avoid user group conflicts. Sites should contain standardized, BLM made rock rings at each site. At current dispersed campsites, official rock rings do not exist. Normally, the public builds them, often in abundance and in low-quality. Visitors often place rock rings behind or against rocks, leading to smoke scars, which damage scenic values and geological resources. BLM should designate a rock ring and have rangers deconstruct and restore visitor made rings.

Without stay restrictions on dispersed camping, we will see individuals practically living in the Alabama Hills, creating waste and lasting impact to the environment and scenic values. Friends of the Inyo supports a possible fee-based permit system, but believes this to be unnecessary at this point in time, as we support closing the Alabama Hills to dispersed camping. If dispersed camping were to reopen, the Bishop BLM should keep the option of the fee-based permit system for dispersed camping if needed to improve management and generate revenue.

Friends of the Inyo supports Alternative 1 Action 3 which would install shade structures at Tuttle Creek campground. When installing shade structures, we urge the Bishop BLM to use natural plant life first, such as native trees that will not require high amounts of water but provide adequate shade. Metallic structures should not be installed, as they will be dangerously hot in the Spring, Summer and Fall, which is unsafe. Over time, these structures will likely degrade, becoming an eyesore and damaging scenic values. Natural and native plant shade structures that require minimal maintenance will be best for the Tuttle Creek Campground. Leaves may fall off trees in the late Fall and Winter, but when this happens, the weather will be cool enough and shade will be less necessary.

If Alternative 1 Overnight Use is selected by Bishop BLM, we support the entirety of Alternative 1 Action 4. Monitoring the 65 dispersed campsites will be critical in assuring that user conflicts are reduced and site issues are addressed. Regular monitoring will also help Bishop FO know which sites are being visited the most and address the needs of each site accordingly. We recommend that camping and vehicle capacity limits are stated on the permits to avoid overcrowding of sites. Consistent monitoring of restored sites will be critical in assuring that illegal camping is not occurring and that impacts from this and other activities are identified and addressed as quickly as possible.

Day Use

1) Allowable Uses and Permit

We agree with Alternative 1 Action 1 that states, “Pets should be on leash or under control of a person.” Due to the high amount of vehicular and foot traffic at the Alabama Hills, we believe that pets should be on leash for safety and improvement of the environment. Dogs dig holes in the dirt and uproot bushes damaging sensitive plant life. Dogs may run into the roads, leading to the possibility of being hit by an OHV or camper. Dogs often play with other dogs, leading to fights, bites and severe injury of the animals and possibly humans. Dogs off leash are much more prone to pooping without notice of the owner. We do not need another layer of waste challenges in the Alabama Hills. For the safety of all who visit and for the benefit of the environment and scenic values, dogs should be on leash when hiking and at campgrounds. BLM enforcement should have the authority to ticket or fine owners of pets that are out of control and damaging the environment, scenic values, and experience of others.

We strongly disagree with Alternative 2 Action 1 which would require a free permit to enter the Alabama Hills National Scenic Area. Not only will the enforcement of a permit likely be ineffective due to the limited number of rangers, other priorities of rangers, and varying entrances, but many also may not know that one is required. There are limited structures and kiosks in the scenic area. It will be very easy to enter the Alabama Hills not see where one would obtain a permit. Or, the kiosk may be out of the way for a day user and they will opt not to retrieve one. Currently, a trip to the Alabama Hills allows for spontaneity. While a day-use permit will not ruin the ability for spontaneity, it will add an extra layer of red tape that will be ineffective in its application and enforcement.

2) Climbing

Our recommendations on climbing vary between alternatives. We support Alternative 1 Action 2 stipulation that states *“Allow bolt replacement or repositioning for safety as determined by individual users on existing routes; must be colored to blend in with the rock.”* With added red-tape, such as requiring permits to update routes, we believe that the routes simply will not be updated, and they will remain unsafe. Many visitors will not know that bolts are unsafe until they begin climbing, which may lead to fatal falls if a bolt breaks. For **new routes**, we support a permit screening system. The Bishop FO should consider developing a short film or in person discussion that advises route developers on best bolting practices and to avoid sensitive resources and formations, and educate on where new routes are not allowed (Sharks Fin).

We also agree with Alternative 1 Action 2, that slacklines, climbing ropes, and highlines should not be left unattended, and certainly not overnight. An exception that should be clarified in the plan is that if folks are in the immediate area they may leave a rope or slack line up. For example, if a group takes a lunch break, they should be able to leave their top rope or slack line up for a short amount of time while they eat. Groups should be within earshot of the rope or slackline they have left up. We also agree with the stipulation that we should “implement seasonal closures if BLM designated sensitive species are documented, such as nesting birds.” Though none are documented at this time, this adaptive management practice will assure we can protect rare plant and wildlife species if they begin to occur in the area.

We fully support “No chipping of rock to create holds. Minimal vegetation, lichen or rock removal allowed. No new routes on arches. No new routes on Shark Fin and other important features.”

We recommend that Bishop BLM FO delineates climbing access trails to decrease social trail development. Many BLM climbing areas have installed very small brown signs to signify the beginning of the trail. This will be helpful as finding the base of many climbs can be confusing, leading to unintended bushwhacking, social trail development, and environmental degradation. These trails should also be designated as pedestrian only.

Friends of the Inyo urges caution on Alternative 1 Action 2 stipulation “remove bolts from existing routes that have a conflict with other NSA values.” There is much ambiguity in the term “scenic” and “NSA values”. Interpretation of this is subjective. Friends of the Inyo strongly urges the Bishop BLM FO to clarify in the plan the need for collaboration with the Southern Inyo Climbers Alliance and establish an understanding of what compromises scenic values before chopping any bolts.

We support Alternative 2 Action 2 stipulation that says “Identify at least one climbing area that is ADA accessible and improve access through hardening of paths and removal of obstacles.” The Alabama Hills have many climbing areas that are directly next to pull outs for vehicles. Executing this action should not require vast amounts of materials. This will assure that those with disabilities are able to climb, belay, or support their friends safely in the Alabama Hills. Wooden structures and ramps should be considered over any metallic ramps, as they will blend in better with the surrounding areas and not contract as much heat in the hotter months.

We strongly oppose Alternative 2 Action 2 stipulation which would prohibit new route developments. Rock climbing is an existing use in the Alabama Hills. With this, comes route development. A permit system for developing new routes is a happy medium between an outright ban on new bolts and allowing unrestricted bolting. The permit system will give BLM a better sense of what resources are going to be impacted by a potential new bolted route. Often, when climbers find a new route they wish to bolt, it will be difficult to stop them. If there is a ban on new bolting, climbers may do it in secret and Bishop BLM will struggle to track where new routes are being installed and what resources are being impacted.

Within all of our recommendations related to rock climbing in the Alabama Hills, we strongly urge the Bishop BLM to set an understanding of collaboration in the Management Plan with the Southern Inyo Climbers Alliance. This will help best enact climbing management directives that protect scenic values, comply with S.47 mandates, allows safe climbing, and forms a fruitful relationship with a key user group in the Alabama Hills.

3) Shooting

We agree with Alternative 1 Action 3 that prohibits shooting on Movie Flat. While Movie Flat does not see much shooting due to high visitor traffic, prohibition of shooting in this zone should clearly be stated in the plan and on the ground so there is no excuse for shooters. Low-level signs should be constructed in the Movie Flat zone to communicate that shooting is not allowed.

4) Drones

We support Alternative 1 Action 4 that would require a permit for drone flying in the National Scenic Area. Drones use on public lands has significantly increased over the past 5 years as they become more affordable. Drones can be noisy and disruptive to surrounding scenery and have been known to crash and cause wildfires.¹

¹ <https://www.fs.usda.gov/detail/coconino/news-events/?cid=FSEPRD573351>

A simple free permit will help increase responsibility and accountability among users while allowing BLM to track their use. Additionally, drones are often used for filming and capturing footage. Requiring a permit is another layer of security for the Bishop BLM to be aware of drone filming, whether commercial or not.

Infrastructure, Health, and Safety

1. Routes

Friends of the Inyo supports a combination of the Alternative 1 and Alternative 2 in Infrastructure, Health and Safety. With 95 miles of inventoried routes in the Alabama Hills and only 15 miles of non-motorized, there is simply not enough opportunity for hikers and pedestrians to experience solitude away from vehicles. We support Alternative 1 Action 1 that would allow foot-traffic only for 0.3 miles of the Arch loop. The Arch Loop is one of the major highlights in the Alabama Hills. There are currently zero pedestrian-only trails in the Alabama Hills and this action can provide visitors a chance to get away from noise and dust to marvel at the Arch and Alabama Hills. Given the amount of foot traffic on this trail, it is a major safety concern to have vehicular access on the .3 miles stretch. We also support the line item in Alternative 1 Action 1, that would create an interpretive walk that would allow users to self guide themselves through the Alabama Hills on foot and limit their interaction with vehicles, dust and noise.

We agree with Alternative 1 Action 1 that would define climbing access trails. Currently, it is very easy to get lost on a number of climber access trails in the Alabama Hills. This will channel all climber foot traffic to one trail and decrease the likelihood of social trail development, better protecting the environment and scenic values from a spider-web of social trails. A small sign should be placed at the entry of climbers trails to decrease the chances of missing the trail. We strongly recommend that Bishop BLM designates climbers access trails as pedestrian-only and make this clear on trail access signs. A number of the climber access trails in the Alabama Hills wind through brush and turn sharp corners. Opening these narrow trails to mechanized uses like bikes can lead to serious user group conflicts and potential injury. The access trails should be set for pedestrian traffic only.

S.47 states that BLM must designate the roads and trails that will sustain a semi-primitive motorized experience or allow motorized use on county-maintained roads in accordance with applicable State and county laws. We believe this is met without any new routes in the National Scenic Area. Bishop BLM should also develop an updated map of OHV roads in the Alabama Hills National Scenic Area, similar to the one in the EA, in order to increase awareness among users and “sustain a semi-primitive motorized experience.” This will help users remain on designated routes and recreate responsibly. Friends of the Inyo highly recommends that Bishop BLM do this during the construction of the implementation plan so it can be released to the public as soon as possible.

2. E-Bikes

On August 29, 2019, Secretary of the Interior David Bernhardt issued [Secretarial Order \(SO\) 3376](#) for the purpose of increasing recreational opportunities through the use of Electric Bikes (e-bikes). This order allows BLM to determine where E-bikes should and should not be allowed through management plans and implementation plans like the Alabama Hills NSA Plan. We fully support all E-bikes being restricted to motorized trails only. This is reflected in Alternative 2 Action 1 routes that states: “All motorized routes would remain available for e-bikes and mountain bikes.”

E-bikes on non-motorized trails present a serious safety concern. Class-1 e-bikes can assist speed up to 20 MPH, while Class-2 and Class-3 e-bikes can assist speed up to 28 MPH. If an e-bike going 20-28mph rounds a turn and collides with a hiker, the result can be fatal. E-bikes are also extremely quiet, rendering their detection more difficult by those on foot. Currently there are zero pedestrian only trails in the Alabama Hills. Allowing E-bikes onto the non-mechanized and non-motorized trails will detract from the hiking experience, be difficult to enforce, and lead to immense and potentially fatal safety concerns.

If Class-1 E-bikes are allowed on non-motorized trails, we are concerned that enforcement will not be regular enough to determine when a Class 2 or Class 3 e-bike is on a non-motorized, hiking, and equestrian trail. Class 2 and Class 3 E-bikes can travel up to 28 miles per hour. Without proper enforcement, we fear all types of E-bikes will be on all types of trails, leading to user group conflicts, crashes, hit pedestrians, and many other safety concerns. The nuance in determining what class e-bike is on trail and then enforcing this, can be alleviated by restricting all e-bike use, no matter the class to only motorized trails, which there is an abundance of (95+ miles) in the Alabama Hills.

3. Facilities

The Alabama Hills are littered with feces and toilet paper. The area is currently plagued by an excessive amount of human waste. While some of the actions we have suggested for the future of the Alabama Hills, like no dispersed camping, may address the volume of human waste, more must be done. Friends of the Inyo supports Alternative 1 Action 2, with the exception that BLM should install toilets, trash and recycling locations in only 2 of the 3 locations proposed in Map 9 of the EA. We support facilities at the entrance of the Alabama Hills and at the Movie Rd. Junction, as demonstrated on Map 9 in the draft plan appendix. These are most commonly seen spots by users traveling into the Alabama Hills. The Bishop FO should update the maps at all existing kiosks to reflect the locations of the bathrooms and proper bathroom etiquette on public lands.

While toilets are not the most scenic, measures can be taken to mitigate their visual impacts. Toilets are a high priority in the Alabama Hills, and when strategically located and well camouflaged they should be less of a burden on scenic values. Construction of a beige/tan plywood barrier around the toilet should blend in with natural features and be less of an eyesore than the standard pit toilet structure. The Buttermilk Boulders climbing area in Bishop provides an example of this. (See Appendix 1). In the short term, the toilets should be transportable and non-permanent to allow the BLM and Alabama Hills Stewardship Group the time to evaluate if a toilet location is working as it should or if another location is more suitable. As time progresses, a more permanent structure may be considered once best locations for toilets are determined.

We believe that dumpsters and recycling should only be located at the exit of the Alabama Hills at this point in time. Waste bins are an extreme eye sore and as we have observed at other front country public land locations in the Eastern Sierra, they become full daily and overflow. The entrance of the Alabama Hills should be the only location for dumpsters and recycling containers.

Scenic Resources

Friends of the Inyo supports Alternative 1 of the Scenic Resources. There is some uncertainty that the Alabama Hills currently fall within the VRM Class 2. When completing the visual resource inventory, as detailed in Alternative 1 Action 2, BLM must determine where the Alabama Hills are falling short of VRM Class 2 requirements and mitigate them accordingly. The management plan should also reflect that the scenic values

looking east towards the Inyo Mountains and Highway 395 are extremely important. Visual impacts should not be exclusively loaded to east facing views. Strong consideration needs to be given to every angle of the Alabama Hills when enacting directives that may have scenic impact.

Geological Resources

Friends of the Inyo supports Alternative 1 and all of the actions detailed in the alternative. Rockhounding is the hand collection of stones, gems, rocks, petrified wood, etc. for personal use and is not collected for commercial purposes or bartered to commercial dealers. We believe that recreational mining, or rockhounding, should be allowed to continue in the Alabama Hills.

We are concerned that the term “casual use mining” can vary greatly in meaning. If allowed, the definition of “casual use” should be clearly specified in the Alabama Hills plan, or the land will be susceptible to significant impacts. Rockhounding is much different from other casual use activities that can occur on valid existing claims by a claim holder or someone given permission by the claim holder. For example, Friends of the Inyo has observed casual use mining at other BLM locations that greatly impacted the land and has gone unreclaimed for over half a year. Appendix 2 shows casual use mining activities where trenches built with hand tools at BLM National Conservation Land site, Conglomerate Mesa. Note the amount of flagging tied around rock samples littered on the ground. This is not an appropriate activity for National Conservation Lands and the National Scenic Area. There needs to be a detailed description of what kind of casual use mining is allowed in the NSA. This description should allow non-commercial recreational rockhounding, but not allow impacts to the degree detailed in Appendix 2 like trenching. We are supportive of an annual free permit that serves as an educational tool for rock hounders, demonstrating what type of recreational mining is appropriate and what type is not.

Cultural-Historical and Cinematographic Resources

1. Cultural

First and foremost, Friends of the Inyo urges that the Alabama Hills Management Plan sets a firm understanding of constant collaboration and communication between the Bishop FO and the Lone Pine Paiute Tribe, crafted by both the tribe and Bishop BLM. The Alabama Hills are the ancestral lands of the Paiute people. The plan and actions on the ground regarding cultural resources should reflect the requests of the Lone Pine Paiute Tribes. We defer to the local tribes when making management decisions on their cultural resources. The plan, if desired by the local tribes, should clearly communicate the preferential decision making of the local tribes on their cultural resources in the Alabama Hills. Friends of the Inyo supports continuous surveying to assure that cultural resources are not damaged and are being managed to the mutual satisfaction of the Lone Pine Paiute Tribe and Bishop BLM.

2. Historical

We support Alternative 1 Historical Structures. With the Bishop BLM taking over the Los Angeles Aqueduct storage bunkers in the Dingell Act land transfer, it is critical that research is conducted so we best understand the history and significance of the structure. We support extra measures to protect the Yellow Sky Arrasta. Currently, there are no barriers and vehicles can approach the structure directly. Individuals walk on the structure and cars have been known to bump into it. Measures must be taken to mitigate this chance of impact and destruction of the structure.

Biological Resources

1. Non-Native Plants and Rare Plants

The Alabama Hills National Scenic Area supports unique plant communities including alkali sacaton (*Sporobolus airoides*) alkaline wet meadow and various Riparian broadleaf tree or shrub alliances, which collectively cover 168 acres (8 acres of alkali sacaton (*Sporobolus airoides*) alkaline wet meadow and 160 acres collective acres of riparian alliances) (at Table 3-3, pg. 67). The EA recognizes that impacts are occurring to the alkali sacaton (*Sporobolus airoides*) alkaline wet meadow from a route, parking area and dispersed campsite which are causing trampling, compaction, and loss of vegetation (at pg.77). Only the No Action alternative proposes an action to have the impact “assessed for the severity of impact and would be considered for restoration as time and resources allowed.” The EA’s alternatives need to include a commitment to eliminate the impacts to this sensitive and unique vegetation type and revegetate the 0.25 acres. Such actions would also reduce impacts to the Inyo phacelia which is also being impacted at this site (at pg.77).

Regarding riparian alliances, the minimal “fuels reduction treatments” which are all proposed outside of the AH NSA in Alternative 2 are preferable over the larger “fuels reduction treatments” in Alternative 1.

2. Wildlife Habitat

Friends of the Inyo supports Alternative 1 and reinforces the need for specific management for certain species. As detailed throughout our comments, we believe detailing adaptive management in the Alabama Hills plan is critical in addressing issues before and as they arrive in the Alabama Hills.

Bats

We support Alternative 1 that would protect the large declining Townsend's big-eared bat by gating the currently ungated maternity roost. Known areas of Townsend's big-eared bat maternity roost should be prioritized when gating AMLs for protection against potentially harmful recreation.

Springsnails

The two proposed alternatives require “Conduct surveys for springsnails in appropriate riparian areas” (at pg.26). but the EA does not comment on following actions to preserve springsnails in the Alabama Hills.. We urge the Bishop BLM to develop and include additional details in the plan on protective actions for these species.

Sierra Nevada Bighorn Sheep

The EA recognizes that “Critical habitat for the Mt. Langley herd unit overlaps with approximately 11 acres of the SRMA on the southwest side of Tuttle Creek” and “SNBS have been documented in the southwestern portion of the planning area (both inside and outside of the Critical Habitat) during winter months (CDFW 2020b).”. However, the EA does not comment on any specific management actions that safeguard and protect the critical habitat and the sheep from impacts. We highly recommend the EA adopt the recovery actions identified in the USFWS’ Recovery Plan for the Sierra Nevada bighorn sheep to aid in the recovery of this federally listed endangered and very imperiled subspecies of California’s bighorn sheep. The BLM also needs to consult with the USFWS on the proposed action.

3. Restoration

Friends of the Inyo supports the entirety of Restoration Alternative 1. When restoring the closed dispersed campsites we urge the Bishop BLM to require native plants and seeds in the plan. To avoid damaging of restored sites, restoration areas must be clearly marked so there is no confusion by users. Bishop BLM has put up great signs on the path to the Sharks Fin to mark restored sites and we suggest signage like this in other restoration

areas. When sites are being restored, user made rock rings should be deconstructed. We urge caution in removing very large rocks scared by fires and encourage Bishop BLM to look into other solutions first, like pressure washing the rocks/boulders. If the rocks are small, easily movable, and not an integral part of the aesthetics of the immediate area, then they can be removed.

4. Resilient Ecosystems

Friend of the Inyo supports Alternative 1 of Resilient Ecosystems. Climate change is affecting the entire world and the Alabama Hills and Eastern Sierra are no exception. Management systems and programs must be implemented to assure the natural environment of the Alabama Hills is resilient to extreme weather events and can sustain itself as much as possible. Resilient ecosystem practices will also support the proactive wildland fire management practices that we suggest in the following section.

Fuels Management and Wildland Fire

1. Fuels Treatment

Friends of the Inyo supports Alternative 1 of Fuels Treatment. Maintaining adaptive management practices for wildfire is critical in times of a warming climate. The scars from wildfire to plant ecosystems and the rocks would not only be devastating for the environment, but would significantly harm the scenic values of the Alabama Hills. Any slash or burn piles as a result of maintenance should be placed in locations that do not impact scenic values and allow for safe controlled burns of excess fuels, if necessary. Fires are an integral part of the plant life cycle in the west, but sometimes when areas are burned through and plants begin to reseed, invasive plants can take over. The plan should clearly reflect actions that would promote native plants restoration and reseedling when fires occur.

We recognize that the Bishop FO possesses limited resources in managing the Alabama Hills. Many Alternative 1 actions will require more boots on the ground. The EA makes it clear that there is an increased potential for significant wildfires if no action is taken. When resources and hands are available, we believe that Alternative 1 fuels management and wildlife mitigation should be a priority due to the potential high impact a fire would have on the Alabama Hills scenic values, the natural environment, user experience and nearby private property. The Bishop FO should consider partners who can help this manage fuels and treatment, like Friends of the Inyo and other stewardship crews.

Livestock Grazing

We understand that the Alabama Hills Stewardship Group is supporting the No Action Alternative for Livestock grazing. We also support this decision. The no action alternative is preferred to respect and protect the current leaseholder's record of good stewardship.

Education, Interpretation, Partnerships, and Science

1. Education and Interpretation

We strongly support Alternative 1 in Education and Interpretation. As the Alabama Hills sees more visitation, it is critical to provide an informational that are both educational and enjoyable for users. Providing informative materials that will allow visitors to give self-guided tours will greatly increase visitor enjoyment in the Alabama Hills. We recommend, in addition to printed brochures and literature, that the Bishop BLM consider developing a digital form of interpretation that will allow users to self guide themselves on a tour through the Alabama Hills to see popular film sites and other areas of interest. This will cut down on paper waste and BLM interp material production costs. We encourage that Bishop BLM collaborate with the AHSG and Lone Pine

Paiute Tribe on interpretive signage to assure the necessity and historical accuracy of any signs/kiosks put up in the Alabama Hills.

2. Partnerships

Friends of the Inyo and the Bishop BLM have enjoyed a long and fruitful relationship in our collaboration on public lands and particularly in the Alabama Hills. We strongly support the management plan reflecting the need for continued collaboration of all groups mentioned in Partnerships Objective 2. We sincerely look forward to working on stewardship projects and interpretive hikes in the Alabama Hills with Bishop BLM for the foreseeable future. Please consider Friends of the Inyo for any trail construction, interpretative hikes, road closure projects, and basic fuels management work that the Bishop BLM needs help with.

Conclusion

Friends of the Inyo has long enjoyed serving and recreating in the Alabama Hills. We have seen this area drastically change over the years and are excited about the opportunity that this plan presents for the Alabama Hills. With this plan, we all have the opportunity to promote the long term conservation of this area as a unit in the National Conservation Lands system. We sincerely thank the Bishop BLM for the opportunity to comment on DOI-BLM-CA-C070-2020-0001-EA. We look forward to continuing our close collaboration with the Lone Pine Paiute Tribe, Alabama Hills Stewardship Group and the Bishop BLM to assure the preservation of the land we all love. We welcome any and all questions about our comments. We look forward to reviewing the final plan when it is released.

Sincerely,

Bryan Thomas Hatchell
Desert Lands Organizer
Friends of the Inyo



Appendix

Appendix 1 - Toilet coverage examples at Buttermilk Boulders



Appendix 2
Casual Use Mining at Conglomerate Mesa

