

**U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
CALIFORNIA DESERT DISTRICT**

ENVIRONMENTAL ASSESSMENT

EA Number: CA-670-EA-2001-48

August 15, 2001

Project: Temporary Camping Closure

BLM Office El Centro Field Office,
1661 S. 4th St.
El Centro, CA 92251

Location, site description, and use of area: An area east of Glamis, adjacent to the Imperial Sand Dunes Recreation Area, California, north and south along the railroad from Glamis, is proposed to be temporarily closed to camping. The area extends north and south to varying distances from and along about a 30 mile stretch of the rail road tracks (see detailed description below), and is about 40 square miles in size. The northern part of the area has historically been used for off-highway vehicle (OHV) staging/camping. The most intensive and concentrated use in this northern area is about a mile from the intersection of Highway 78 and the rail road tracks, directly east of Glamis. The southeastern end of the proposed closure is used for hunting, mineral collecting, and by snowbird (winter-time campers) camping but at a lower intensity level than the area near Highway 78. A map is included as a part of this assessment.

This area is undeveloped and is managed by the Bureau of Land Management (BLM) for a variety of uses and resource values, including dispersed camping. Vehicles are permitted to travel existing routes and camp within 300 feet either side of these routes. Although many vehicle trails and tracks cut through the area, there are fewer than 10 access points between the camping area and the dunes along Ted Kipf Road, the main public access route point. The intensively-used portion of the area consists of old gravel pits and inter-connecting roads.

Visitors who camp in the northern part of this area are typically families trying to get away from the crowds, dust, and intensive concentration of use and camping that occurs in the designated open area west of the railroad tracks. BLM has not made average weekly use counts of the area proposed for closure, but estimates that fewer than 10 vehicles are in the area on an average two-day cool-season weekend. The situation is different on holiday weekends - e.g., during President's Day weekend last year 200 to 300 vehicles were observed in this area. During the peak use period - Thanksgiving weekend - it is possible that even greater numbers of vehicles may be found.

Land Use Conformance and Other Regulatory Compliance: This closure conforms to the *California Desert Conservation Area (CDCA) Plan*, 1980, as amended, which allows for the taking of appropriate action, including closure of routes and areas, if monitoring indicates inappropriate uses are occurring or uses are having deleterious effects to natural resources (CDCA Plan, page 82, reprinted version). The proposed action is in conformance with Title 43 of the Code of Federal Regulations (CFR), Subpart 8364, regarding closures and restrictions. Prior to making a decision, BLM will consult with the U.S. Fish and Wildlife Service pursuant to Section 7 of the Endangered Species Act, 16 U.S.C. §1536 (ESA) and its implementing regulations in 50 CFR §402.14. The closure is also within the area covered by the Northern and Eastern Colorado Desert Plan (NECO) and the Imperial Sand Dunes Resource Management Plan, amendments to the CDCA Plan, which are being developed.

Background: On March 16, 2000, the Center for Biological Diversity, and others (plaintiffs) filed for injunctive relief in U.S. District Court, Northern District of California (court) against the Bureau of Land Management (BLM) alleging that the BLM was in violation of Section 7 of the ESA by failing to enter into formal consultation with the U.S. Fish and Wildlife Service (FWS) on the effects of adoption of the CDCA Plan, as amended, upon threatened and endangered species. On August 25, 2000, the BLM acknowledged through a court stipulation that activities authorized, permitted, or allowed under the CDCA Plan may adversely affect threatened and endangered species, and that the BLM is required to consult with the FWS to ensure that adoption and implementation of the CDCA Plan is not likely to jeopardize the continued existence of threatened and endangered species or to result in the destruction or adverse modification of critical habitat of listed species. One species, the desert tortoise, was listed in 1990 as threatened.

Although BLM has received biological opinions on selected activities, consultation on the overall CDCA Plan is necessary to address the cumulative effects of all the activities authorized by the CDCA Plan. Consultation on the overall Plan is complex and the completion date is uncertain. Absent consultation on the entire Plan, the impacts of individual activities, when added together with the impacts of other activities in the desert, are not known. The BLM entered into negotiations with plaintiffs regarding interim actions to be taken to provide protection for endangered and threatened species pending completion of the consultation on the CDCA Plan. Agreement on these interim actions avoided litigation of plaintiffs' request for injunctive relief and the threat of an injunction prohibiting all activities authorized under the Plan. These interim agreements have allowed BLM to continue to authorize appropriate levels of activities throughout the planning area during the lengthy consultation process while providing appropriate protection to the desert tortoise and other listed species in the short term. By taking interim actions as allowed under 43 CFR Subpart 8364, BLM contributes to the conservation of endangered and threatened species in accordance with Section 7 (a) (1) of the ESA. BLM also avoids making any irreversible or irretrievable commitment of resources which would foreclose any reasonable and prudent alternative measures which might be required as a result of the consultation on the CDCA plan in accordance with Section 7 (d) of the ESA.

One outcome of the settlement negotiations is the *Stipulation and Proposed Order Concerning All Further Injunctive Relief* (January 17, 2001). Paragraph 45 of the *Stipulation* states: "BLM shall, within 30 days of the signing of this Stipulation by the parties, implement via

emergency closure published in the Federal Register, a camping closure on BLM lands in the vicinity of the Algodones Dunes within the following areas: (a) beginning at the intersection of Highway 78 and the railroad tracks, proceeding southeasterly along the railroad tracks to their intersection with Ogilby Road (S34), proceeding north and east along Ogilby Road (S34) to its intersection with Highway 78, proceeding southwest along Highway 78 to its intersection with the railroad tracks, the point of beginning, and (b) beginning at the intersection of Highway 78 and the railroad tracks, proceeding northwesterly along the railroad tracks to Acolita, proceeding due east to the boundary of the Chocolate Mountains Aerial Gunnery Range, proceeding along the boundary of the Chocolate Mountains Aerial Gunnery Range to the Mesquite Mine, proceeding due south to Highway 78, proceeding west along Highway 78 to the railroad tracks, the point of beginning.” The closure area described above was subsequently (July 9, 2001) reduced in size through negotiations among BLM, the intervenors and the plaintiffs, as described below under the Proposed Action.

NEED FOR ACTION

The temporary camping closure is needed to prevent impacts to desert tortoise habitat and its associated plants and wildlife until BLM completes section 7 consultation as described above on the NECO bioregional plan. The area of the proposed closure contains desert tortoise habitat and habitat for a variety of other plant and animal species as discussed further in this EA. While the area has previously been disturbed for gravel extraction and gold mining activities, its use for vehicle camping, throughout the proposed closure area, amounts to about 500 acres, most of which is located in the northern (Glamis area) end and which is tortoise habitat. The area is designated as a Limited Use area in the CDCA plan. This designation is commensurate with the area’s species and habitat values.

The Imperial Sand Dunes, which is directly accessible through various points from the proposed closure area, has been an important off highway vehicle (OHV) use area for over 20 years. A considerable portion of the dunes south of Highway 78 is designated as an Intensive Use, OHV Open Area. On cool-season weekends between October and June tens of thousands of visitors enjoy the riding and camping opportunities. BLM estimates that on major holiday weekends an average of 150,000 people visit the Imperial Dunes. The 1980 CDCA Plan and the 1987 Imperial Sand Dunes Recreation Area (ISDRA) Plan set the management direction for this area. Over several years some of the camping associated with the Open Area has expanded beyond the actual boundary of the Open Area east of Glamis and the railroad tracks. The railroad tracks define the eastern boundary of the open area.

Following implementation of a fee demonstration project at Imperial Sand Dunes in 1997, BLM has been concerned that public use in this proposed-closure area might increase even more from those desiring to escape paying the fees required at other camp sites. Consequently, BLM increased the amount of signs and information reflecting BLM’s Limited Use management, posted information on the internet at http://www.ca.blm.gov/elcentro/limited_use.html, and increased public contacts to help achieve public compliance. All this has been somewhat successful in maintaining the historical use level.

DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

Proposed Action: Public lands within the following area, described in two parts, will be temporarily closed to camping pursuant to 43 CFR Subpart 8364:

- Part 1: to the north of Highway 78 (78), an area bounded on the south by 78, on the west by Ted Kipf Road, on the east by the Union Pacific Railroad tracks (UPRR), and on the north by a connecting line between Ted Kipf Road and the UPRR at a point 12 miles northwest of 78.
- Part 2: an area north and south of 78, bounded in part to the southwest by the UPRR, to the extreme southeast by Ogilby Road, and to the northeast by the private property of the Mesquite Mine; and further bounded outboard to the north and east to a point of one (1) mile and parallel to the pattern and connections of the following three roads - 78, Vista Mine Road, and Ted Kipf Road.

The total area is approximately 40 square miles in size (see attached map). The closure does not apply to private lands within this area.

Vehicle travel in the camping-closure area will continue to be authorized on existing routes of travel. Signs advising the public of the closure would be placed around the perimeter of the area by BLM staff. The area would be actively patrolled to ensure compliance.

This action is temporary and will terminate with the signing of the Record of Decision for NECO which is anticipated in September 2002.

No Action Alternative: The closure will not be implemented. Present management policies and practices will continue as provided in the CDCA Plan. Vehicle use is authorized on existing routes of travel.

AFFECTED ENVIRONMENT

Air Quality: The proposed camping closure area is located in the Salton Sea Air Basin and Imperial County. The area is State and Nationally listed for non-attainment of PM₁₀ (Particulate Matter less than 10μ in size), and ozone. The estimated annual average emissions for 2000 in both the Air Basin and Imperial County show that the major sources of PM₁₀ are fugitive dust (60-70%), and unpaved roads (15-18%). OHV contributes less than .04%. However, the OHV contribution to Ozone, as reflected in the Reactive Organic Gases and the Nitrous Oxide values, is less than .5%. In the vicinity of the proposed camping closure, OHVs could contribute to an episodic local increase of PM₁₀ and/or Ozone, but such increases would be expected to occur only on major holiday weekends during the peak use season at the Imperial Sand Dunes, and is not expected to significantly change regional air quality. Because the camping and OHV use will be displaced to other areas in the vicinity of the proposed camping closure area, the BLM action will result in no net change in either the local or county air quality. There will be no meaningful impact of the closure on air quality and it will not be analyzed further in this EA.

Water Quality: The proposed camping closure area is under the purview of the California Regional Water Quality Control Board - Colorado River Basin Region, Region 7, which sets the water quality standards. The proposed camping closure area is located within the Region 7 Desert Aquifers Watershed Region on the alluvial fan formed by the Chocolate Mountains. The area is dissected by numerous washes which only carry surface water during localized storm events. The washes do not drain into any navigable water. The flow in the washes sinks into the ground in the vicinity of the proposed camping closure area near the toe of the Imperial Sand Dunes. There are no applicable water quality standards or criteria which apply in the vicinity of these washes. Any localized problems associated with dispersed camping in the area will be displaced to other open camping areas in the vicinity. These areas would also not be subject to any current regulations or criteria. There will be no meaningful impact of the closure on water quality and it will not be analyzed further in this EA.

Soils and Watershed: In the vicinity of the proposed camping closure area there is some soil compaction and other soil disturbance. Some of the soil disturbance can be attributed to the camping and use of OHVs; however, this impact is confined to a small portion of the overall area proposed for closures. As indicated in the Water Quality section above, the disturbed soil is not contributing to violation of water quality standards or criteria. The proposed closure of one year is not long enough to allow any recovery of vegetation or soils in the disturbed areas. The displacement of the camping to other previously disturbed soil areas will not substantially impact the soils in those areas and will result in no net change in soil disturbance. From the standpoint of the soils and watershed there will be no meaningful impact from the proposed closure and it will not be analyzed further in this EA.

Vegetation: Vegetation communities in the proposed camping closure are creosote bush scrub and desert dry wash woodland/microphyll woodland. The percentage of the closure area occupied by each has not been determined but desert dry wash woodland/microphyll woodland is likely the greater of the two. Creosote bush scrub is dominated by creosote bush (*Larrea tridentata*), brittlebush (*Encelia farinosa*), and a variety of annual plants. Microphyll woodland in the area is dominated by ironwood (*Olneya tesota*), blue palo verde (*Cercidium floridum*) and honey mesquite (*Prosopis glandulosa*). These plant communities provide an array of structural components, foraging, and breeding opportunities for a variety of wildlife. No threatened or endangered plant species, including Peirson's milk-vetch, are known to occur in this area. As noted above BLM estimates that about 500 acres are disturbed from camping activities. Some of this affects vegetation through crushing and burning in camp fires. While the plant communities area still largely intact, localized disturbance is undue and damaging.

Because the interim nature of the closure (approximately one year) will not provide sufficient time for vegetation to be restored in disturbed areas, and the areas to which campers are likely to move to are not habitat for any listed plant species, no meaningful change would be expected in the vegetation. Thus this topic will not be discussed further in the EA.

Wildlife: The proposed closure area is habitat for the desert tortoise (*Gopherus agassizii*), a species listed as threatened by federal and state governments. Tortoise densities are about 20 to 30 tortoises per square mile (Karl pers. com. 2001) outside areas of intensive camping. The area is not critical habitat and has not been categorized by BLM with respect to tortoise. In the area

heavily affected by camping, few tortoises are likely to occur because of past habitat degradation, collecting, disease and other mortality. No other federally listed animal species are known from the area, however microphyll woodland is habitat for the state-listed Gila woodpecker (*Centurus uropygialis*).

In addition to the tortoise, a wide variety of other species may occur in the area including 2 toad species, 11 species of lizards, 13 species of snakes, about 100 species of birds, 10 species of bats, 6 rodent species, the desert cottontail, blacktail jackrabbit, kit fox, coyote, bobcat, badger, mountain lion and mule deer. Several of these species listed as “sensitive” by the BLM include: Couch’s spadefoot toad (*Scaphiopus couchi*), the California leaf-nosed bat (*Macrotus californicus*), Townsend's western big-eared bat (*Plecotus townsendii*), pallid bat (*Antrozous pallidus*) and Yuma myotis (*Myotis yumanensis*).

Because of historical disturbance from sand and gravel mining, roads, railroad, and recreation, the abundance and diversity of wildlife is reduced in and around the existing camping areas compared to nearby desert lands. In particular the sand and gravel mining has reduced the camping area’s habitat cover. The nearby Glamis Store (about 0.1 miles from the camping area) also attracts coyotes and ravens that may prey upon tortoises and other wildlife, adding to the area’s reduced biodiversity. The remainder of the closure area (farther than about 0.8 miles from Glamis) is only lightly impacted and would be expected to have a greater abundance and diversity of wildlife.

Cultural Resources: Most of our knowledge about cultural resources within and around the Area of Potential Effect (APE) for this closure was acquired through ethnographic, archaeological, and historical studies carried out in support of the CDCA Plan during the late 1970s. For this effort approximately 0.5% of the CDCA planning area in this part of the California Desert was surveyed for significant cultural resources (Gallegos, et. Al., 1979; Von Till Warren et al., 1981; CDCA FEIS and Proposed Plan, Appendix VII, 1980). The results of these efforts indicate that, although our knowledge of the area is limited, the area is rich in cultural resources that represent a range of prehistoric and historic activities, including major aboriginal trade and transportation trails, aboriginal rock art and large ground figures (intaglios), historic mining, transportation (historic trails and railroads), and historic military. In the vicinity of the APE, areas identified as very sensitive for significant cultural resources include the Picacho/Chocolate Mountain area and the East Mesa area (located west of the Sand Hills). There are no known historic properties listed on the National Register of Historic Places within the APE. However, there are several properties in the vicinity that are considered to be eligible or have been formally determined eligible for the National Register, including the historic mining towns of Obregon and Tumco, located just to the east of the APE in the Cargo Muchacho Mountains, and sites associated with the Desert Training Center (Bischoff, 2000). Many of the aboriginal ground-figures in the area also may be eligible for inclusion in the National Register as part of the *Earth Figures of California - Arizona Colorado River Basin Thematic District*.

Within the APE, a review of records maintained in the California Historic Resources Information System (CHRIS), as well as information on file in BLM offices in Riverside and El Centro indicate that approximately ten survey projects have been conducted within the APE encompassing 544 acres (2.1%). Most of survey data was compiled during the CDCA planning effort. The level of survey coverage within these survey blocks is not known, but is assumed to be

intensive. No sites were identified in the CDCA survey areas. Despite the lack of survey coverage, a large number of sites have been independently recorded outside of systematic survey efforts. Within the APE, there are 78 recorded sites. There are an additional 85 known sites located within a one mile buffer lying generally to the east of the APE. Eleven sites are located within a corridor in the APE that extends one mile east and parallel to Kipp Road., south of State Highway 78. The remaining 67 sites located within the APE are concentrated in area of approximately 9 square miles that make up the extreme northeastern portion of the APE south of State Highway 78. Some of these sites are spatially extensive. These sites have not been evaluated and this area should be treated as highly sensitive for cultural resources until further analysis and assessment can be conducted.

Recreation: The ISDRA borders the area proposed for camping. On a busy weekend 150,000 people go to the Dunes and several hundred vehicles seeking to avoid crowds and fees in the ISDRA have moved into the area east of Glamis to camp as noted above. These campers ride their ATVs from their camping areas into the Dunes and return. Play riding also occurs around the camping area, particularly by the young OHVs so their activities can be supervised by their parents. The level of such use is expected to increase in the future.

The most heavily visited area of the ISDRA borders the area for the proposed temporary camping closure. The major holiday weekends (Halloween, Thanksgiving, New Years, Martin Luther King Birthday, Presidents' Weekend, Easter) bring the high numbers of visitors noted above. During the busiest holiday, Thanksgiving, 200-300 vehicles may be associated with the camping in the proposed temporary closure site. Vehicles involved with camping in this area tend to include self-contained motor homes, attached OHV trailers, and the OHVs. At this time we are unable to determine how many of these campers are historical visitors to the area and how many are using the area to escape the fees. As stated in the background section, most of the intensive camping occurs within one mile of the intersection of Hwy 78 and the rail road tracks. OHVs also use the area to access the Boardmanville Trading Post through "wash 10", a railroad under-crossing large enough for OHVs to pass underneath. South of wash 10 are two other railroad crossings, Cactus and Clyde. Public use of these crossings is not sanctioned by the railroad.

The southwestern end of the proposed temporary camping closure area contains a considerable amount of "desert pavement". During the winter season, "snowbirds" (seasonal visitors seeking the warmer climate) utilize existing trails to access these sites for long term camping. Trails in this area are used as recreation and access for OHV activity based out of the Gold Rock Ranch private campground.

Dispersed camping also occurs seasonally throughout the area in association with hunting and rockhounding activities. Local area residents have historically utilized the area for mule deer and bird hunting. These visitors tend to utilize established camp sites that have been used for generations.

Areas of Critical Environmental Concern (ACECs): There are no foreseeable effects on any ACEC. The closest ACEC, East Mesa Flat-tailed Horned Lizard, is over 15 miles away and not adjacent to the ISDRA.

Environmental Justice: Persons using the area proposed for temporary closure include all income levels. There would be no disproportionate affects to minority or low income people.

Farmlands: No farmlands would be directly or indirectly affected by either action.

Flood Plains: No flood plains would be affected.

Non-native Species: There would be no net affect on weed species populations.

Native American Concerns: There are no known concerns expressed after informal consultation with Native Americans.

Visual Resources: The area of the proposed closure shows gravel pits, roads and the remains of previous disturbance. There would be not net effect to visual resources.

Hazardous Wastes: There would be no net effect on any hazardous substances.

Wild and Scenic Rivers: There are no designated wild and scenic rivers in the area.

Table 1. Critical Elements Checklist

Critical Element		Alternative 1		Alternative 2		Initial
		Affected		Affected		
		Yes	No	Yes	No	
Air Quality		X		X		
ACEC's			X		X	
Cultural Resources			X		X	
Environmental Justice			X		X	
Farmlands, Prime/Unique			X		X	
Floodplains			X		X	
Invasive/Non-native species			X		X	
Native American Religious Concerns			X		X	
Recreation			X	X		
T&E Species	Wildlife	X			X	
	Plants		X		X	
Visual Resources			X		X	
Waste, hazardous or solid			X		X	
Water Quality			X		X	
Watersheds/soils			X		X	
Wild & Scenic Rivers			X		X	
Wilderness			X		X	

Note that both alternatives affect the same resources although in different ways. For example, the desert tortoise is positively affected by alternative one and negatively affected by alternative 2.

ENVIRONMENTAL CONSEQUENCES

Proposed Action - Temporary Closure to Camping

Wildlife: Adverse effects (mortality, habitat degradation, injury and disturbance) to wildlife from vehicle camping would be reduced on Public lands within the closed area. A substantial decrease in noise and visual disturbance to wildlife is likely to occur, probably encouraging more wildlife to return to the area. Tortoises, the Gila woodpecker and other wildlife species would be expected to benefit from the closure, especially in areas peripheral to areas of heaviest camping. Tortoises would be less likely to be run over or collected and their habitat would be protected from detrimental impacts such as devegetation and soil compaction. Benefits would not be as significant in heavily camped areas which are also close to mining, railroad, road, Glamis Store, and Highway 78.

Because of the presence of the railroad, Highway 78, Ted Kipf Road, past and current gravel mining activity, predators, and people associated with Glamis Store, the highly disturbed area near the junction of highway 78 and Ted Kipf Road is unlikely to ever support a sizable population of tortoises again. Tortoises that do enter the area are likely to be eaten by coyotes or ravens, collected by visitors or run over by vehicles. However, the closure would prevent the spread of camping and its associated OHV riding into areas still only lightly affected by camping activities. Benefits to the tortoise would probably occur in these outlying areas but fewer benefits to tortoise are likely to be realized in the area of high-density camping, just east of Glamis. These benefits would be reduced mortality, disturbance, collection and habitat degradation.

Campers displaced by the closure could go to any of several locations: the ISDRA fee area, along the railroad north of the closure, along the Coachella Canal west the ISDRA, the Superstition Mountain or Plaster City Open Areas, the Ocotillo Wells State Vehicular Recreation Area or to private lands within the proposed camping area near Boardmanville, Vista Mine Road, or Clyde. Other potential locations include the Coachella Valley or other distant OHV areas in the southern California area, such as Dumont Dunes or even into Mexico. Impacts to wildlife (mortality, devegetation, disturbance, injury etc), including listed species, could increase at locations which are not managed OHV areas. Species that could be affected include the Coachella Valley fringe-toed lizard (*Uma inornata*), desert tortoise (at Dumont Dunes) or flat-tailed horned lizard, *Phrynosoma mcallii*, (in Mexico, Ocotillo Wells, Plaster City or Superstition Mountain). The likelihood, extent or location of these indirect impacts are difficult to gauge because the behavior of the displaced campers is hard to predict. However, most campers would likely seek out locations in or near the ISDRA rather than travel to more distant locations.

In the Fee Area, few additional impacts to wildlife from camper return are likely because this area has already been heavily affected by camping and managed open area uses. The return of a few hundred extra vehicles would probably not cause a noticeable additional effect to wildlife.

For campers intent on avoiding the Fee Area but still wishing to ride the Dunes, the most likely locations to camp are on the west side of the Dunes between the new and old Coachella Canals or on private lands near Boardmanville (T. 13S, R.18E, section 36) and along Vista Mine Road (T. 14S, R.19E, section 16). In the first case, impacts to the flat-tailed horned lizard Management Area (MA) may occur if campers play ride to the west of the old Coachella Canal. In the second case, additional tortoise habitat could be disturbed near Boardmanville or along Vista Mine Road.

Determined campers may also camp just on the outskirts of the closure along its northern boundary, east of the railroad, impacting tortoise habitat. If all campers in the area proposed for closure go to these locations, as much as 300 acres of additional sensitive or threatened species habitat could be affected; however, BLM believes many of the campers will relocate to existing developed OHV campgrounds and does not expect full displacement to new undisturbed areas. If necessary, to prevent further impacts to tortoise or other sensitive species, BLM would implement additional appropriate management actions, possibly further closures. The Imperial Sand Dunes Resource Management Plan will provide a more thorough analysis of uses and impacts in and adjacent to the Sand Dunes and is expected to be completed in October 2002. If displaced campers move to the fee area or leave the Dunes area, impacts to Boardmanville tortoise habitat or the flat-tail MA would not occur.

Recreation: Campers who utilize the area, whether related to OHVs, or other recreational activities, will be displaced and could move to other locations as noted above. OHV campers will most likely move to existing developed campgrounds or other remote desert sites. OHV campers who utilized the area to get away from the crowds, and who are unable or unwilling to camp in a remote area, will now be likely to camp in the more congested areas. This could further increase congestion in already crowded areas. Visitor satisfaction will most likely decrease for displaced visitors. Parents who were using the proposed temporary camping closure area as a safe place for their children to camp and ride OHVs might sense or experience more hazards to their children in the congested areas.

Wilderness: The North Algodones Wilderness would not be directly affected as a result of the closure; however if displaced campers move northwest from Glamis along the east side of the railroad, they might be tempted to ride into the Wilderness Area. Similarly, campers displaced to the western edge of the Wilderness Area along the Coachella Canal might also be so tempted. BLM believes the likelihood of such incursions is low because of positive visitor outreach and compliance.

Cultural Resources: A temporary camping closure is an administrative action that would normally not be considered an undertaking subject to review under Section 106 of the National Historic Preservation Act. No ground disturbing actions are being authorized nor will there be any change in use or authorizations for new uses that might result in direct effects to significant historic properties. Furthermore, an administrative closure is also treated as an exempt undertaking in the Statewide Protocol with the California State Historic Preservation Office and is not subject to review for effects to cultural resources. Nevertheless, BLM has analyzed this action and determined that a temporary administrative closure will have no direct effect on historic properties within the APE. As a general statement, a consequence of closing an area to camping and motor vehicle activity should be an assumption of a positive benefit to the overall preservation and protection of cultural resources.

Concern has been raised about the potential for indirect effects to historic properties resulting from the closure. Indirect effects might result from displaced motor-vehicles and campers moving into other areas containing significant cultural resources. Sites are located throughout the area and it is possible that some sites might be inadvertently affected by this displacement. However, any analysis of potential effects would be speculative at this time.

The No Action Alternative

Wildlife: Under this alternative adverse impacts to wildlife (mortality, habitat degradation, disturbance and injury) from camping would continue in the proposed closure area. These impacts could spread to the southeast along Ted Kipf Road, leading to increased adverse impacts to the tortoises, Gila woodpeckers and other wildlife species. However, possible adverse impacts to sensitive wildlife species (tortoise, flat-tailed horned lizard) from displaced campers described under the proposed action section would likely not occur

Wilderness : The North Algodones Wilderness Area would not be affected under the No Action Alternative because no displacement would result as discussed under the proposed action section.

Recreation: No impacts would occur to the recreational activities in the proposed area.

Cumulative Effects

Wildlife: The habitats and species in and around the proposed closure have been affected by a variety of uses: the railroad, Ted Kipf Road, Highway 78, sand and gravel mining, camping, OHV riding, use around the Glamis Store, Mesquite Mine, recreational hunting and illegal immigration. These impacts have disturbed and fragmented habitats and increased wildlife and plant mortality. Some of these uses occur exclusively on private lands and some on both private and public.

This closure is part of a larger pattern of temporary closures that will provide some positive benefit to wildlife and habitats in the California Desert. In November of last year about 32% of the 150,000 acres of the ISDRA was closed to protect populations of Peirson's milkvetch. Another closure of about 300 acres was implemented in spring 2001 near the Gray's Well Bridge to protect the flat-tailed horned lizard habitat. These closures are reducing habitat degradation (devegetation, soil compaction, exotic plant invasion), fragmentation, disturbance and wildlife mortality in the closed areas but may displacing impact effects as well. The temporary closures will end at various times generally related to completion of amendments to and consultation on the CDCA Plan.

Recreation: Many visitors to the ISDRA feel that OHV-related recreation opportunities are being reduced throughout the California Desert over the last few years. Based on public comments by OHV-related recreation users, reduction of recreation opportunities has resulted from a variety of past actions including the 1994 Desert Protection Act and will continue to occur as judged by proposals being made in the variety of CDCA Plan amendments being developed at this time.

Despite such views by some members of the public, this camping closure is temporary and thus will not significantly reduce camping opportunities in the Imperial Sand Dunes area on a cumulative basis. Other existing opportunities for dispersed camping are available west of the railroad and in other areas near the dunes. BLM also operates five developed campgrounds off Gecko Road. The other temporary closures elsewhere in the California Desert relate to specific route closures and do not directly involve any established camping areas.

Description of Mitigation Measures

1. If the proposed camping closure were implemented, BLM would monitor areas and established

campsites surrounding the Imperial Sand Dune Recreation Area for increases of effects of OHV play. The focus of such monitoring would be on the area between the new and old Coachella Canals to the west and tortoise habitat to the east. If adverse additional effects are detected, BLM would respond with appropriate management actions.

Residual Effects:

Wildlife: The likelihood of adverse impacts to tortoise and flat-tail lizards from displaced campers would be substantially reduced. No residual impacts are anticipated.

Recreation: Stated effects to recreation of the proposed temporary closure, including cumulative, would remain.

PERSONS AND AGENCIES CONSULTED

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