



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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April 12, 2013

In Reply Refer to:
LLCAC07000
8300 (P)

Courtney Smith
Inyo County Dept. of Public Works
Post Office Box Q
Independence CA 93526

Re: Notice of Combined Use Application letter dated December 7, 2012.

Dear Courtney:

Thank you for the opportunity to review the combined-use segments proposed in the Adventure Trail System application to Inyo County. In your letter you request that the BLM confirm that each trail segment on BLM public land that is linked by a [proposed] combined-use segment on a county maintained road is legal for use by green sticker vehicles. For clarification purposes the term "green sticker vehicle" is defined as vehicles not equipped or licensed for use on California highways but rather vehicles registered by the CA. Department of Motor Vehicles as off-highway vehicles (OHV) that receive either a green, red or out-of-state registration sticker.

We have analyzed the proposed combined-use segment map and have determined that the trail segments on BLM lands linked to by the proposed combined-use segments on county maintained road are open and legal for OHV subject to conformance with the Bishop Resource Management Plan 1993 (RMP). However, should resource concerns arise or trail conditions change, the BLM may close or restrict use of these routes at any time. It is also important to note that some of the combined-use segments link to trails on BLM land that offer very limited recreational opportunities and to areas that contain sensitive resources. Please see Table 1 outlining our concerns in areas that are linked to by combined-use segments.

You also asked that we provide any other comments that may be pertinent to the Adventure Trail System application.

We are concerned with Implementing Procedure 13. (d), stating that the County will request land management agencies to monitor OHV use on trails that link to combined-use segments. With declining budgets and staffing levels, the BLM is not in a position to provide any new or additional monitoring on these routes. Currently BLM routes are monitored on an annual basis

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and we have no ability to provide additional monitoring for routes that are linked to by a combined-use segment. Conversely, we would ask that Inyo County monitor use on these routes and provide an annual report to the BLM describing visitor use statistics. The county should conduct baseline monitoring of use prior to program implementation in order to show change over time.

We are also concerned with Implementing Procedure 13. (f) which states that land management agencies will be asked to provide comments and observations regarding roads in the pilot program including monitoring results. As stated previously, we have no ability to provide new monitoring on these routes. In order to mitigate this concern, we propose that the county conduct baseline photo monitoring and field exams of BLM routes linked to by a combined-use segment prior to implementation of the program. Photos and notes should then be retaken annually to show change over time, establishing how routes are being impacted. The county would provide annual monitoring results to the BLM.

Finally, BLM does not have the capacity to repair routes should new use result in damage. Should route conditions deteriorate to a point where resource damage is occurring, BLM may be forced to close or restrict use on the routes. We propose that if annual monitoring of BLM routes connected to a combined-use segment shows route degradation or maintenance needs, that the county provide financial assistance to the BLM for maintenance and repair. Financial assistance may be monetary or through in-kind volunteer labor. Likewise, if new illegal routes or areas are established as a result of irresponsible or illegal use due to the combined-use segment, we request that the county take financial responsibility for their restoration.

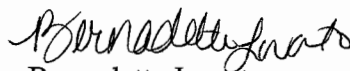
Table 1.

| Map Name | Segment Name | Comments |
|-------------|---|---|
| Bishop Area | Bishop No. 6 Pleasant Valley Campground to BLM trail segment near Horton Creek Campground | Limited OHV opportunity to the south of Horton Creek Campground because the road dead ends - no access to Forest Service land. From Nov 1-May 31 the Round Valley mule deer herd is monitored for their health and protections may be placed on activities in the area including restricting public access to critical winter ranges. OHV use allowed only to access (come and go) campsites, no OHV play riding allowed within campground. |
| Bishop Area | Bishop No. 7 Pleasant Valley Campground to BLM trail segment near Tungsten City | From Nov 1-May 31 the Round Valley mule deer herd is monitored for their health and protections may be placed on activities in the area including restricting public access to critical winter ranges. . High concentration of non-motorized users in the area. |

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|----------------|---|--|
| Bishop Area | Bishop No. 8 Pleasant Valley Campground to BLM trail segment off Casa Diablo Road | Trail traverses multiple Wilderness Study Areas; BLM must maintain these areas in their current condition and not allow any new use pattern to be established until Congress releases them or they are designated Wilderness. This is an important region to the Bishop Paiute Tribe. |
| Lone Pine Area | Lone Pine No. 3 Lone Pine to Dolomite Road Loop Road | Limited OHV opportunity as this road leads directly, within a 1 mile drive, into private property with a locked gate. OHVs would need to turn off before the end of the combined-use route. Area also contains Wilderness and Wilderness Study Areas; BLM must maintain these areas in their current condition and not allow any new use pattern to be established until Congress releases them or they are designated Wilderness. |
| Lone Pine Area | Lone Pine No. 7 Lone Pine to Hogback Creek Road | Limited OHV opportunity because in less than 1 mile the road ends at Whitney Portal Road. BLM recommends that the combined-use segment extend from Movie Road to Moffat Ranch Road going north and avoid Hogback. This would enable access to the "Chicken Ranch" area which possesses numerous opportunities for OHV touring. |

Again, the Bishop Field Office looks forward to working with you as the County moves forward with processing the pending application. I would welcome a conversation should you require additional clarification regarding our concerns and recommendations related to the Implementing Procedures. Please contact Rich Williams, (760) 872-5033, with questions regarding the specific concerns listed in Table 1.

Sincerely,


 Bernadette Lovato
 Bishop Field Manager