

## THE WILD RIVERS PROJECT

A PROJECT OF FRIENDS OF THE RIVER AND THE CALIFORNIA WILDERNESS COALITION

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Mr. Chris Otahal BLM Barstow Field Office 2601 Barstow Road, CA 92311 amargosa@blm.gov

Dear Mr. Otahal:

Please accept these scoping comments jointly submitted by Friends of the River and the California Wilderness Coalition in regard to the development of an Amargosa Wild & Scenic River Comprehensive River Management Plan (CRMP).

The National Wild & Scenic Rivers Act requires federal agencies to develop a CRMP three years after Congress and the President protects a stream as a Wild & Scenic River. The purpose of the plan is to fully identify and protect the river's free flowing character and outstandingly remarkable values, establish river corridor boundaries, and review segment classifications if needed. In addition, the CRMP includes an implementation plan that identifies the resources the agency needs to fully protect and manage the river.

The Interagency Wild & Scenic River Coordinating Council has produced guidelines for the development of a CRMP. The Interagency CRMP guidelines are attached.

In 2009, Congress and President Obama protected 26 miles of the Amargosa River in the National Wild & Scenic River. In the Northern and Eastern Mojave Desert Management Plan (2002), the Bureau of Land Management (BLM) identified the Amargosa eligible for national protection in recognition of its outstandingly remarkable scenic, recreation, historical, cultural, wildlife, and geological values.

The Amargosa River flows seasonally through the Mojave Desert in California and eventually into Death Valley National Park. Downstream of the town of Shoshone, the river flows largely above ground through public lands managed by the BLM. The river sustains biologically rich wetlands and riparian forests, and cuts through a rugged canyon defined by colorfully eroded cliffs and rock formations in the heart of the existing Kingston Wilderness.

A rare desert oasis in the desert, the wetlands, springs, and riparian habitat along the river support more than 260 bird species, including the endangered willow fly catcher, yellow-billed cuckoo, and least Bell's vireo. The river is also home to two sensitive fish, the Amargosa

pupfish and speckled dace, and the endangered Amargosa vole, a small mammal found nowhere else on earth.

Humans have lived along the river for more than 10,000 years and the canyon is rich in prehistory and Native American culture. Explorers and settlers established the Old Spanish Trail along the river in the early 1800's, which was replaced in 1907 by the steel rails of the Tonopah and Tidewater Railroad. Today, the railroad is gone, but the rail bed provides an excellent non-motorized trail route through the Amargosa River Gorge and existing Kingston Wilderness. The trail could be extended northward to connect the small towns of Tecopa and Shoshone. Because of its warm winter weather and proximity to Death Valley, the Wild Amargosa attracts hikers, birdwatchers, mountain bikers, rock hounds, and many other desert visitors who contribute significantly to the local tourism-based economy.

The Amargosa is a unique desert river in the National Wild & Scenic Rivers System. The river deserves special attention in regard to developing and implementing a plan that fully protects its free flowing character and outstandingly remarkable values for present and future generations.

We recommend that the CRMP address the following issues:

<u>Fully Identify And Understand Outstandingly Remarkable Values</u> – The CRMP should fully identify and describe in detail the river's outstandingly remarkable scenic, recreational, wilderness, cultural, historical, wildlife, botanical, and geological values, particularly where such values may be site-specific. Although the river is clearly rich in cultural values, no complete inventory and assessment has ever been conducted. The CRMP should call for additional studies and inventories to improve understanding and protection of cultural and other values.

<u>Fully Protect Outstandingly Remarkable Values</u> – The CRMP should recognize that managing according to Wild, Scenic, or Recreational classification does not automatically assure protection of outstandingly remarkable values. For example, motorized use may be allowed in Scenic and Recreational segments, but such use if not restricted to non-sensitive areas could degrade or harm the river's outstanding wildlife habitat or cultural values. The CRMP should identify potential threats to specific outstanding values and propose management measures to protect these values from the potential threats.

River Corridor Boundaries – Establish river corridor boundaries averaging 320 acres per mile to protect the river's site-specific outstanding values, as well as springs and wetlands that contribute to the flow of the river. Springs and other water sources on public lands that may be outside the standard ¼ mile boundary should be included in the corridor. The biologically rich braided channels and wetlands upstream of Tecopa should also be included. To compensate, the river corridor boundary within the protected Kingston Wilderness could be more narrow, thereby fulfilling the average acreage per mile.

Non-motorized Trail Development – The Tonopah and Tidewater Railroad bed through the Kingston Wilderness already makes an excellent non-motorized trail to explore the Wild & Scenic River. The CRMP should determine the need for more formalized trailheads and trailhead facilities and include a plan on improving and maintaining the trail. In addition, the CRMP should consider the possibility of extending the trail for non-motorized use northward

along the rail bed to connect the towns of Tecopa and Shoshone. This potential trail extension could significantly increase local eco-tourism opportunities. The CRMP should maintain motorized access to the existing Sperry Wash OHV Trail but discourage illegal motorized off-trail use to protect the river's sensitive values and the Kingston Wilderness.

<u>Invasive Species</u> – Existing native habitat along the river is suffering from the encroachment of tamarisk and other non-native species. The CRMP should address the need for an aggressive invasive species remediation plan to restore native species and habitat.

<u>Upstream Water Withdrawals</u> – The free flowing Amargosa is heavily dependent on upstream groundwater. The CRMP must assess the impacts of upstream water withdrawals and determine whether the BLM should apply for water rights from both the State of Nevada and State of California to protect the river's free flowing character and flow dependent outstanding values.

<u>Land Acquisition</u> – The CRMP should identify those private inholdings within and adjacent to the river corridor appropriate for willing seller acquisition or purchase of scenic easements.

<u>Management Resources</u> – The CRMP should identify the funding and staff resources the agency needs to fully achieve the goal of protecting the river, including signage, trail construction and maintenance, public interpretation and education, additional ranger patrols, and enforcement. In addition, the CRMP should identify governmental and non-governmental partners that may be able to assist in providing some of these resources.

Please provide a copy of the draft CRMP when it becomes available for public review and comment.

Thank you.

Sincerely,

Steven L. Evans

Wild Rivers Project Consultant

Representing:

