

SANTA MONICA MOUNTAINS CONSERVANCY

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December 5, 2011

Mr. Greg Hill, RMP Team Lead
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, California 92262

**Draft South Coast Resource Management Plan
and Environmental Impact Statement**

Dear Mr. Hill:

The Santa Monica Mountains Conservancy (Conservancy) is the State agency responsible for open space planning in the Rim of the Valley Corridor, which includes portions of the South Coast Resource Management Plan (RMP) area in Los Angeles County. The Conservancy supports the general thrust of the RMP update and looks forward to working with BLM to implement coordinated conservation efforts. The comments below relate to specific proposed activities within the Conservancy's jurisdiction.

The Conservancy strongly supports the RMP's proposed designation of Upper Santa Clara River BLM lands as an Area of Critical Environmental Concern (ACEC). These lands are included in the Angeles Linkage Conceptual Area Protection Plan (CAPP), a multi-jurisdictional conservation planning effort in the upper Santa Clara River watershed. The BLM currently owns 1,620 acres within the Angeles Linkage, forming a critical spine of protected land for ongoing conservation activity. The proposed ACEC designation will further these efforts by ensuring that BLM management is consistent with shared resource conservation objectives. Consistent with this designation, the RMP would enhance protection for visual resources in Soledad Canyon and withdraw these lands from surface entry mining.

The Conservancy further supports the RMP's general policies that protect riparian areas and oak woodland from disturbance. These habitats are increasingly rare in Southern California and contribute a disproportionate benefit to the region's biodiversity. The Conservancy encourages greater protection of coastal sage scrub habitat as well in the RMP. The RMP's proposed wildland fire management activities that respect ecological sensitivities are an improvement over current practices.

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The Conservancy supports retention of BLM lands within regional habitat conservation plan areas and encourages collaborative management with local and State agencies. The Conservancy hopes that BLM will continue to be an active partner in the Angeles Linkage CAPP and leverage federal resources to advance regional conservation objectives, including acquisition of new lands. Lands within the CAPP and Santa Clara River watershed as a whole should only be disposed of through Protective Disposal to an appropriate local or State land management agency.

While BLM lands are mostly marked for retention under the draft RMP, the Conservancy urges that any lands the BLM intends to dispose of in the Santa Clara River watershed and the Conservancy Zone be first offered to conservation entities. The Conservancy requests that BLM recognize its statutory first right of refusal for all public land to be disposed of within the Conservancy's jurisdiction (California Public Resources Code §32646). This includes isolated parcels that BLM may find uneconomic to manage as federal land. The Conservancy's joint powers partners, the Mountains Recreation and Conservation Authority (MRCA) and Desert and Mountain Conservation Authority (DMCA), successfully manage such remote or discontinuous properties as part of a regional conservation strategy. The Conservancy, MRCA, and DMCA are willing to enter into any federal land disposal process that results in the permanent protection of open space in their respective jurisdictions (see attached map). The Conservancy and MRCA have particular interest in the BLM properties adjacent to the Santa Clarita Woodlands.

Lastly, as a minor point of correction, the BLM parcels noted on page 3-19 east of Interstate 5 are not located within the Santa Monica Mountains.

Thank you for the opportunity to review the draft RMP. If you have any questions, please contact Paul Edelman of our staff at (310) 589-3200, ext. 128.

Sincerely,

ANTONIO GONZALEZ
Chairperson