

California Native Plant Society

May 6, 2004

Field Supervisor
Carlsbad Fish and Wildlife Office
U.S. Fish and Wildlife Service
6010 Hidden Valley Road
Carlsbad, CA 92009

RE: Comment on the Draft Economic Analysis of Critical Habitat Designation for the Peirson's Milkvetch.

Dear Field Supervisor,

The California Native Plant Society (CNPS) is a non-profit organization of more than 10,000 laypersons and professional botanists organized into 32 chapters throughout California. The mission of the California Native Plant Society is to increase understanding and appreciation of California's native plants and to conserve them and their natural habitats, through education, science, advocacy, horticulture and land stewardship. Our members and chapters work closely with the U.S. Fish and Wildlife Service (USFWS) and other State and Federal agencies to manage and conserve rare and common botanical resources in California.

CNPS has reviewed Draft Economic Analysis of Critical Habitat Designation for the Peirson's milkvetch (*Astragalus magdalenae* var. *peirsonii*). The CNPS is a science-based organization and offers the following comments on the document.

The CNPS supports the establishment of Critical Habitat for the conservation of *Astragalus magdalenae* var. *peirsonii*. The document fails to acknowledge any benefit of conserving a species that is threatened by extinction from motorized recreation activities. The dollar value of *Astragalus magdalenae* var. *peirsonii* based only on the measures of the existing market, is an inaccurate evaluation. There are many other values, destined to grow with our knowledge of the species in science, medicine, aesthetic and in ways still unforeseen. This plant has the largest seeds of any plant in its genus; perhaps the gene that provides for that will be determined to be of great value in the future. What will be the value in 3000 A.D? Essentially limitless, with the gratitude of the generation then alive to those who, in their wisdom, saved it from extinction. No one can guess the full future value of the species.

General Comments:

According to the document, "Visitation rates to the ISDRA have climbed steadily over the years and are anticipated to continue to trend upward over the next ten years (BLM, 2003b; CA DSPR, November 20, 2003)." Additionally, "While visitation fluctuates annually, BLM projects a steady growth in visitation over the next ten years (BLM, 2003b; BLM, 2003c; BLM, Knauf and Hamada, October 17, 2003)." The report uses one year's reduction in visitor usage (2002 to 2003) to extrapolate effects of closing areas, while weather or other factors could have had an impact. Yet, the report acknowledges that visitation rates have climbed steadily and are anticipated to continue upward. Since



Dedicated to the preservation of California native flora

there are few areas with the recreational sand resources of the Algodones Dunes, it would seem that even if areas are closed to protect plants, visitation will still increase, and thus the economic impact would be negligible.

Since most of the visitation occurs on weekends and major holidays, and since the closing of certain areas would impact the availability of space on those crowded weekends, one might conclude that users might spread their usage over other times, resulting in similar usage and economic expenditures.

Also, the report did not consider the economic effects of needing to bring in law enforcement officers from all over California to deal with the holiday weekends. What are the long-term economic effects in the areas where law enforcement is relaxed (due to officers being sent to the Imperial Sand Dunes) in terms of increased resource damage in those areas?

The report frames the analysis with regards to Imperial and Yuma counties only. Decreases in ORV use in these counties from conservation requirements may result in increase in revenues in other counties that provide sand dune opportunities that do not host rare species. The CNPS requests that the displacement benefit to other counties be evaluated in the final Economic Analysis.

Document Specific Comments:

No analysis evaluates the Algodones dunes as a worldwide destination of botanical endemism. Only on the Algodones dunes are plant enthusiasts assured of seeing six endemic plant, during the spring. Exhibit 2-2 (Pg 2-8) fails to mention two additional plant species documented to occur on the Algodones dunes: Wiggin's croton (*Croton wigginsii*), a state-listed Rare species and the Borrego milk-vetch (*Astragalus lentiginosus* var. *borreganus*), a CNPS list 4 species. While this botanical opportunity is well known within the international botanical community, the economic analysis fails to evaluate this opportunity. This type of "recreation" is as legitimate as ORV recreation and therefore we request its inclusion in the final Economic Analysis.

ES-3 Footnote 2. The CNPS requests that these types of economic analyses be included in the Final Economic Analysis, because these costs are local taxpayer based issues that would likely be reduced if closures were implemented for conservation purposes. We see these as a win-win situation for local economies.

ES-9 – The premise that "this analysis assumes that visitation within the ISDRA is evenly distributed within each management area" is unrealistic, because of the known distributional patterns of motorized recreation over the ORV accessible areas of the dunes. More accurate data needs to be incorporated to fully evaluate this economic issue in the final document

Pg 2-9. The Economic Analysis fails to acknowledge that the primary reason that the non-motorized recreation occurs in the non-motorized recreation area (North Algodones Dunes wilderness) is that it is simply dangerous to be on foot in the motorized recreation areas. While motorized recreation areas are desirable for botanical investigation, the safety issue is for foot-going recreation is of serious concern and motorized recreation areas are essentially unavailable for non-motorized recreation.

The CNPS requests that all of these issues be thoroughly addressed in the Final Economic Analysis, so that all of the issues will be included for land management decisions. Essentially, the CNPS supports the fact that contemporary economic impact is negligible when considered to the extinction of a species whose million year evolutionary lineage is threatened by a poorly regulated recreational activity.

Sincerely,

Ileene Anderson
Southern California Regional Botanist
California Native Plant Society

Steven L. Hartman
Treasurer
California Native Plant Society

cc: David Chipping, Conservation Director, CNPS
California Department of Fish and Game