

December 8, 2000

Superintendent Richard Martin
Death Valley National Park
Death Valley, CA 92328

RE: Comments on Revised Draft Environmental Impact Statement and General Management Plan, July 2000

Dear Superintendent Martin,

The California Native Plant Society (CNPS) is a statewide, non-profit organization of laypersons and professionals dedicated to the conservation and protection of native plants in their natural habitat. We are pleased to see much improvement in this Revised Draft Environmental Impact Statement and General Management Plan (DEIS/GMP) from the 1998 Draft.

CNPS has identified several areas where important resources have not been adequately addressed as follows:

Table C-2, Plants of Special Consideration Recorded within Death Valley National Park is a great improvement over the previous draft table. However, this table still does not include all of the sensitive plant species that occur within the Park's boundaries. Six additional sensitive species are documented to occur and include:

- *Chaenactis douglassii* var. *alpina* (CNPS List 2, Red Code 2-1-1) occurs on the first ridge north of the summit of Telescope Peak
- *Chrysothamnus Greenei* (CNPS List 2, Red Code 2-1-1) is known from five occurrences in the Park, including south of Grapevine Canyon, near Ubehebe talc mine, near Anvil Spring, south of Chloride City and south of Rest Spring.
- *Cordylanthus tecopensis* (CNPS List 1B, Red Code 3-2-2) at Saratoga Springs.
- *Eriogonum puberulum* (CNPS List 2, Red Code 3-1-1) on the summit of Tin Mountain.
- *Scutellaria lateriflora* (CNPS List 2, Red Code 3-2-1) reported from wet meadows and marshes in Saline Valley. This site needs investigation, because the only other occurrence in California is coastal. It should also be included as an important component of the "site-specific management plan" for Saline Valley identified in Alternative 1 (Page 80).
- *Sisyrinchium funereum* (CNPS List 1B, Red Code 3-1-2) where all occurrences occur within the Park boundaries at Travertine, Texas, and Grapevine Springs. At Navares springs the plants are threatened by exotic fan palms. They also occur along Cow Creek.

Because some of these species are associated with water resources, they could be identified and a management strategy should be included in Alternative 1 under the "inventory all water sources within the boundaries of the wilderness area/park unit" (page 65)

Despite a similar comment on the 1998 Draft on Unusual Plant Assemblages, few unique vegetation types are recognized in the Revised Draft. Death Valley National Park contains truly an astounding array of plant communities, and some of them are very rare within California. Those include:

- Interior Dune Systems – the Eureka Dunes are discussed in the context of the sensitive species that occur on them (see discussion below)

- Rupicolous vegetation – in the Last Chance and Inyo Mountains, unique plant communities occur that are specifically associated with limestone and dolomite outcrops.
- Shadscale scrub in Lee Flats
- Salt and brackish water marshes (Transmontane Alkali Marshes)
- Mesquite bosques

Recognition of these unique resources as occurring within the park and a commitment to monitoring them is appropriate, especially for the last two types because their existence is predicated on maintaining groundwater resources.

With regards to Eureka Dunes, as proposed in Alternative 1, CNPS urges the Park and US Fish and Wildlife Service to finalize the draft agreement on the voluntary joint conservation strategy, which has been in draft stage for over three years. We support the restriction of sandboarding/skiing on the dunes to protect these very rare plant species.

With regards to the Introduced Species – Nonnative Vegetation (Pages 70) of Alternative 1, CNPS supports the removal of tamarisk, Russian thistle and hornwort. This section should also address prescriptions for invasive exotic plant species other than these. With California under assault by exotic species, some species (ex. *Brassica tournefortii*) have great potential to be accidentally introduced and establish. Some of these species have the ability to catastrophically alter ecosystem processes (particularly fire regimes). We encourage the Final EIS/GMP to include a section on general exotic plant species policy and potential prescriptions for control/eradication.

With regards to the Grazing section (Alternative 1, page 93), no timeline for the management plan is provided. With active grazing occurring on the allotment, when will a plan be put in place? What are the interim guidelines for grazing, to allow appropriate management prior to the plan being put in place? We request that a series of specific ecological standards be developed that will be used to assure that the Park's purpose to "preserve the unrivaled scenic, geologic, and natural resources of these unique natural landscapes" is achieved. With standards identified, specific ecological questions can then be asked and appropriate sampling methodologies can be determined.

Finally, CNPS generally supports Alternative 1, as proposed, including the above comments. We hope you find these comments useful, and thank you for the opportunity to submit them. We look forward to working with Death Valley National Park on plant conservation projects in the future.

Sincerely,

Ileene Anderson
Southern California Regional Botanist
California Native Plant Society

cc: Emily Roberson, Senior Land Management Analyst, CNPS
David Chipping, Conservation Chair, CNPS
CNPS State Office