Dear Secretary Jewell,

Congratulations on your new position. We are writing regarding the Bureau of Land Management’s anticipated decision on management of the Imperial Sand Dunes Recreation Area in the California Desert Conservation Area which includes the Algodones dunes which covers over 160,000 acres and is the largest dunes ecosystem in the United States. Over 23,000 acres of this area was designated as the Imperial Sand Hills National Natural Landmark in 1966.

On behalf of our hundreds of thousands of members we ask that you do not simply adopt the Bureau’s recommendation, but turn your attention to careful consideration of the impacts and affects of adopting the proposed decision. The Bureau’s preferred alternative would open an additional 40,000 acres of the dunes complex, including over 6,000 acres of rare microphyll woodlands, to uncontrolled destruction by off road vehicles.

Our groups have engaged in the administrative process and protested the proposed decision and fully recognize the need to balance some recreational use with conservation. We oppose the proposed Bureau decision because it would cause unnecessary and undue destruction of the resources of our public lands including listed and rare plants and wildlife, lands with wilderness characteristics, and increase particulate emissions further impairing air quality in the Imperial air basin which is already one of the most impaired air basins in the country.

Of great concern is that the proposal completely fails to acknowledge the increasing need to conserve rare sand dunes, desert washes, and microphyll woodland habitats in the California desert to off-set and mitigate for impacts from renewable energy development on public lands which are a high priority for this administration as a key part of the clean energy initiatives in the
face of climate change. As a result, adopting the Bureau’s preferred alternative in a final
decision would significantly undermine ongoing planning for renewable energy development in
the Desert Renewable Energy Conservation Plan process which the Fish and Wildlife Service
and the Bureau have both committed countless hours and
significant resources to support.

We urge you to please take the time to consider how the
proposed Imperial Sand Dunes
Recreation Management Plan
would undermine other Department
of Interior priority projects
including the development of
renewable energy in the California
deserts before a decision is issued.

We would welcome the
opportunity to discuss this timely and important issue further with you at your convenience.

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