February 12, 2025

Bureau of Land Management, Barstow Field Office
Marc Stamer, Field Manager
2601 Barstow Road
Barstow, CA 92311

Re: Fire response and request for temporary closure at Borehole Spring in Tecopa, California

Mr. Stamer:

There was a fire at Borehole Spring in Tecopa, California on February 11, 2025. We are writing this letter to urge BLM to take certain steps to protect public lands resources and ensure rapid and meaningful restoration in response to this fire, including the emergency closure of the Borehole Spring recreation site.

Yesterday, a fire suspected to be started by a recreational user at Borehole somehow got out of control and lit the Borehole marsh on fire. Preliminary photographs show almost complete destruction of the marshlands north and east of Tecopa Hot Springs Road, potentially wiping out some of the most important remaining Amargosa vole habitat in the area.

Borehole Spring is a blown out mineral exploration well which has discharged thermal water steadily since its creation in the 1960s, it is hydrologically connected to the Amargosa River, the associated wetlands and spring complex. It now is a popular recreation area, featured on dozens of hot spring and travel websites, on YouTube channels[1] with hundreds of thousands of subscribers, and in national publications such as the *Los Angeles Times*[2] and the *New York Times*.[3] This has led to a steady increase in visitation in recent years.

Borehole Spring is also part of the critical habitat for the Amargosa vole. The Amargosa vole's critical habitat was designated in 1984,[4] and includes all of the wetlands surrounding Borehole Spring, as well as lands to the south and west surrounding Tecopa Hot Springs. The entirety of the recreation area utilized at Borehole Spring is within Amargosa vole critical habitat. Due to its continuity with marshes across Tecopa Hot Springs Road, its robust marsh of three-square bulrush, and its high habitat patch size, the vole habitat at Borehole Spring meets the criteria as a viable long-term population source for the Amargosa vole.[5]

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[1] https://www.youtube.com/@wonderhussy, https://www.youtube.com/@StrangeRVTours
[2] https://www.latimes.com/travel/story/2020-01-10/tecopa-foodie-haven-hiking-hot-springs
[3] https://www.nytimes.com/2024/05/31/travel/wild-swimming-freshwater-california.html
[4] 49 Fed. Reg. 45160
[5] Foley, J., and Foley, P., 2016. Rapid Assessment and Extinction Prediction using Stochastic Modeling of the Endangered Amargosa Vole. *Wildl. Biol. Pract., 12*(1): 1-11; Castle, S.T., Foley, P., Clifford, D.L., Foley, J., 2020. A

Historically, the marshes at Borehole Spring supported among the largest population of voles – during catastrophic drought in the mid-2010s, as much as 85-90% of the global Amargosa vole population was confined to the marsh at Borehole.[6] After stochastic events resulted in significant degradation of the marsh, numerous parties including UC Davis, the Amargosa Conservancy, Inyo County, and BLM, partnered to conduct restoration of the marsh at Borehole. By 2017, bulrush density and cover increased by 500% compared to pre-restoration levels, and a bulrush litter layer began to regenerate.[7] The marsh at Borehole Spring has become a vibrant wetland habitat and provides essential year-round habitat for the Amargosa vole. It is of irreplaceable value to the species, and the recent fire threatens that value.

We are writing to urge BLM to act with haste in order to protect and stabilize the habitat affected by this fire. There are several actions which must be taken immediately to prevent further degradation and promote the restoration and rehabilitation of the Borehole area:

- **BLM should immediately close Borehole Spring to all recreational use.** Borehole Spring is an immensely popular recreation site. It now is extremely vulnerable to invasive species or vegetative type conversion. People may track in seeds or otherwise provide vectors for invasive and/or undesirable plant species. Soils are fragile and susceptible to trampling. It is imperative to the future of the Amargosa vole that the Borehole Spring marshes be restored to their pre-fire condition. The only way to accomplish this is to keep people out of the site while efforts to rehabilitate the area are underway. The area must be closed to recreational use until a comprehensive site plan can be established.

- **BLM should initiate a Burned Area Emergency Response (BAER) for Borehole marsh.** Restoration of Borehole Spring is essential to the future conservation of the Amargosa vole. Starting a BAER response will help BLM access badly needed funds to ensure protection and restoration of this area is prioritized. BLM must prioritize emergency response actions including invasive species management and soil protection.

- **BLM should work with partners to devise a site restoration plan.** We are still a couple of months from the active growing season in Tecopa marsh. If BLM acts with haste and works with partners to develop a site restoration plan, it could conceivably be enacted this spring and summer during the active growing season. These ecosystems are resilient but the marsh at Borehole Spring will need a boost to recover from this catastrophe. The

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stochastic structured metapopulation model to assess recovery scenarios of patchily distributed endangered species: Case study for a Mojave Desert rodent. PLoS ONE 15(8): e0237516.

[6] U.S. Fish and Wildlife Service, 2016. Biological Opinion for Habitat Restoration of Marsh 1 near Tecopa Hot Springs, Inyo County, California.

[7] U.S. Fish and Wildlife Service, 2020. Biological Opinion for the Borehole Marsh Water Control Replacement Project, Inyo County, California (6840 (P) LLCAD08000).

BLM should coordinate closely with Amargosa Conservancy, other local partners, and ad hoc Amargosa Vole Team members to establish this plan and identify emergency funding sources to get work underway as soon as possible.

- **BLM must develop a plan to better manage recreation at Borehole Spring and the site should remain closed until such a plan is implemented.** The community has been asking for better management of recreation at Borehole Spring for years, and now our worst fears of damage from human-caused fire have been realized. BLM must devise a recreation management plan at Borehole Spring before public access is restored. The restoration of the Borehole marsh will be a large investment of time and money, and it would be foolhardy to do so without a plan for how to prevent the same thing from happening again.

Crisis creates opportunity. BLM now has an opportunity to accomplish two important goals: restore the habitat at Borehole Spring, and create a framework to manage recreation at Borehole Spring sufficient to prevent damage to the irreplaceable biological resources there.

The Amargosa vole is teetering on the edge of extinction.[8] Efforts that have been taken to avoid such an outcome depend on the marshes surrounding Tecopa retaining their fundamental ecological integrity. The catastrophic fire at Borehole Spring presents an inflection point: will the marshes in Tecopa begin a long slide toward complete degradation? Or will land managers and the community seize the moment and begin to rectify the issues that threaten this species, including unmanaged recreation at Borehole Spring?

We urge BLM to take immediate action to close Borehole Spring to recreational use until a recreation management plan has been devised; and to implement emergency measures to plan for and execute restoration and rehabilitation to ensure this habitat remains viable into the future.

Sincerely,

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[8] Foley and Foley, 2016; Castle *et al.*, 2020.