Monitoring of Peirson's Milk-vetch in the Imperial Sand Dunes Recreation Area

U.S. Department of the Interior
Bureau of Land Management
El Centro Field Office, 2024

Cover photo of BLM Botany Intern Clarissa Diaz (left) and U.S. Fish and Wildlife Services Biologist Mary Crawford surveying for Peirson’s Milk-vetch, March 2024, Imperial Sand Dunes, CA. (Photo by Ismael Ramirez, BLM)

Secondary photo of Peirson's Milk-vetch (*Astragalus magdalenae* var. *peirsonii*) found on plot, March 2024, Imperial Sand Dunes, CA (Photo by Ismael Ramirez, BLM)

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1. Preface

The author of this report is Ismael Ramirez, Natural Resource Specialist for the Bureau of Land Management (BLM), El Centro Field Office.

This report documents the 2024 monitoring efforts of Peirson's Milk-vetch (*Astragalus magdalenae* var. *peirsonii*) (PMV) in the Imperial Sand Dunes Recreation Area (ISDRA) as required annually by the Imperial Sand Dunes Recreation Area Management Plan (ISDRAMP). The monitoring study was designed by John Willoughby of the BLM (now retired), Tony McKinney of the U.S. Fish and Wildlife Service (also now retired), and Andrew Trouette, formerly of the BLM. Data from a 2005 dunes-wide survey of PMV was used to select macroplots for monitoring. This report documents the tenth year of annual monitoring of PMV by the El Centro BLM.

The monitoring conducted in 2014 and 2015 is documented in Willoughby (2015). The 2016 monitoring is documented in Willoughby (2017a), the 2017 monitoring is documented in Willoughby (2017b), and the 2018 is documented in Bruner (2018). The 2019 is documented in Vialpando (2019), the 2020 and 2021 are documented in DeJongh (2020, 2021), the 2022 is documented in DeJongh and Ramirez (2022), and the 2023 is documented in Ramirez (2023). The 2018 and 2019 monitoring reports were revised based on feedback/comments by John Willoughby who identified PMV being recorded with non-OHV damage erroneously. These reports were resubmitted to the U.S. Fish and Wildlife Service (USFWS) in 2020 and subsequent reports and monitoring efforts were revised to prevent these errors and better reflect the data.

The following individuals worked to accomplish the 2024 monitoring effort:

Bureau of Land Management	
Adrian Hernandez, Park Ranger, BLM El Centro Field Office	Jeffery Sahagun, GIS Specialist, BLM California Desert District Office
Arturo Casarez, Park Ranger, BLM El Centro Field Office	Joceline Moreles, Botany Intern, BLM El Centro Field Office
Clarissa Diaz, Botany Inten, BLM El Centro Field Office	Jose Caceres, Law Enforcement Ranger, BLM El Centro Field Office
Damian Montano, Park Ranger, BLM El Centro Field Office	Michelle (Shelly) Lynch, District Field Manager, BLM California Desert District
Daniel Baca, Law Enforcement Ranger, BLM El Centro Field Office	Robert Hermes, Fire Mitigation Education Specialist, BLM California Desert District
Ismael Ramirez, Natural Resource Specialist, BLM El Centro Field Office	Taylor Liddane, Archaeologist Intern, BLM El Centro Field Office

U.S. Fish & Wildlife	
Kent Kowalski, Biologist, U.S. Fish and Wildlife Service	Mary Crawford, Biologist, U.S. Fish and Wildlife Service

2. Introduction

In March 2024, the BLM monitored the abundance of PMV in the Imperial Sand Dunes Recreation Area (Dunes), located in southeastern Imperial County, California. PMV is a Federally-listed threatened species and a State-listed endangered species.

The ISDRAMP prescribes two levels of monitoring for PMV, a full-scale approach when October-December precipitation in the Dunes is greater than 1.82 inches, and a less-intensive approach when precipitation during the October-December period is less than 1.82 inches (Figure 1). Nineteen macroplots, each 50m x 500m in size, were permanently established in areas representing the full range of PMV habitat in the Dunes, including areas both open and closed to off-highway vehicle (OHV) use. Six of these macroplots

are required to be monitored in years in which the October-December precipitation is less than 1.82 inches; these plots are 6, 8, 10, 13, 15, 16, and plot 19 is generally done as a practice plot. All 19 macroplots are to be monitored in years in which the precipitation during that period equals or exceeds 1.82 inches. Annual monitoring of PMV in the Imperial Sand Dunes began in 2014; 2024 is the eleventh year of the surveys.

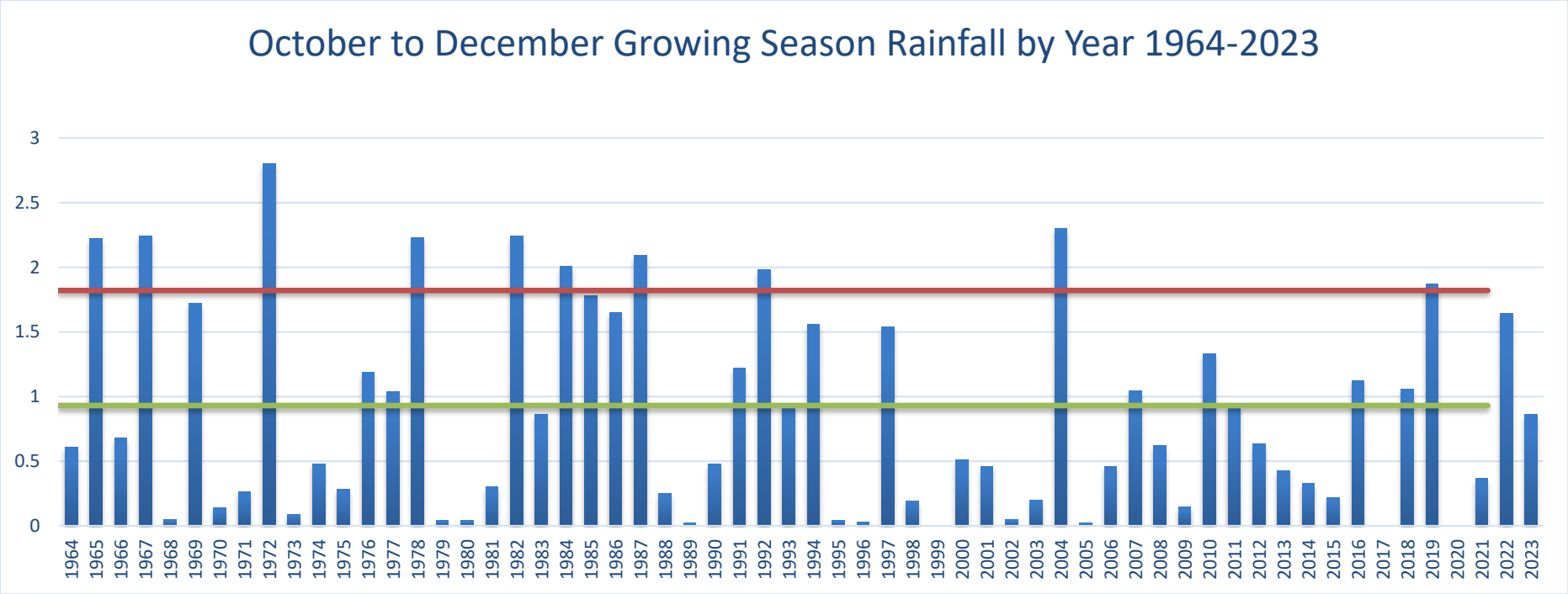

Figure 1. Total October-December growing season precipitation from 1964-2023 in the Imperial Sand Dunes. Precipitation values for growing seasons from 1964 to 2000 are the averages of seven Western Regional Climate Center (WRCC) weather stations in the vicinity of the Imperial Sand Dunes. The values for growing seasons 2001 to 2023 are the averages of the precipitation recorded by the Cahuilla and Buttercup Remote Area Weather Stations (RAWS) in the Imperial Sand Dunes. The value for the 2019 growing season is the average of the precipitation recorded using NOAA 4-inch manual rain gauges at the Cahuilla and Buttercup RAWS stations. The bottom green line is at 0.93 inches or the average October-December growing season precipitation of the 7 WRCC weather stations. The top red line is at 1.82 inches or 1 standard deviation above the average (standard deviation = 0.89 inches). Growing seasons with October-December precipitation higher than the standard deviation line are expected to be exceptional flowering years for Peirson's Milk-vetch. Monitoring during the spring following the 2004-2005 growing season (Willoughby 2005b) supports this expectation.

3. Methods

3.1 Monitoring Protocol

In 2014 nineteen permanent macroplots were established in areas representative of good PMV habitat within the Imperial Sand Dunes based on past occurrence data. Macroplots are 50m by 500m in size and are oriented southwest to northeast. The macroplots are divided into forty 25m by 25m cells called microplots (Figure 2).

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
40	39	38	37	36	35	34	33	32	31	30	29	28	27	26	25	24	23	22	21

Figure 2. 50m x 500m macroplot showing division of macroplot into forty 25m x 25m cells for data recording purposes. Cells are surveyed in the order they are numbered, from Cell 1 to Cell 40.

A cell size of 25m x 25m was chosen to mimic the cell sizes used in the 2003-2007 sampling of PMV (Willoughby 2004b, 2005a, 2005b, 2006, 2007). In those studies, long belt transects, 25m wide and between 2.35 and 7.73 km long were used to estimate the population size of PMV each year. PMV were recorded in 25m segments along each belt transect, resulting in a dataset consisting of more than 339,000 cells in 2005, of which more than 26,116 supported one or more PMV plants. The 2005 data represent both the richest data set (in terms of number of cells surveyed) and the best estimate to date of the abundance and distribution of PMV in the Imperial Sand Dunes (Willoughby 2006; FWS 2008).

During the 2005 annual monitoring event, the dunes were divided into 16 separate sampling areas, each of which were sampled using a systematic random sampling scheme (Map 1).[1] Ten of these sampling areas were selected to be monitored in 2014 and in subsequent years based on the number of plants found in the 2005 survey. The chosen sampling areas run the full extent of the Dunes from northwest to southeast; they include only the westernmost sampling areas because most PMV plants occupy these areas, which is also the reason most of the critical habitat is concentrated in the westernmost sampling areas (Map 1).

The average amount of precipitation for the October-December growing season is 0.93 inches based on growing season precipitation data recorded by seven Western Regional Climate Center weather stations in the vicinity of the Imperial Sand Dunes from 1964-2000.

[1] Note that the numbering system for the 16 sampling areas used in 2005 is missing the numbers 1, 2, 9, and 10. Sampling areas with those numbers were sampled in 2004 and proved to be too variable, so they were divided into smaller sampling areas for the 2014 sampling. New numbers were assigned to these smaller sampling areas.

A growing season precipitation total of 1.82 inches would be 0.89 inches or 1 standard deviation above the 1964-2000 average growing season precipitation levels.

Table 1 lists the general locations, number of macroplots, and the criteria used to distribute the nineteen permanent PMV macroplots among the 10 sampling areas in the Imperial Sand Dunes. In years with October-December precipitation above 1.82 inches, all 19 of these macroplots will be monitored.

Table 1. Distribution of 19 Peirson's milk-vetch monitoring macroplots in the Imperial Sand Dunes. The table lists sampling areas from north to south (see Map 1).

Sampling Area	Number of Macroplots	Criteria
13	1	One macroplot in the Mammoth Wash area of the Dunes in critical habitat north of the area that was closed between 2000 and 2013.
14	1	One macroplot in the Mammoth Wash area of the Dunes in critical habitat inside the area closed between 2000 and 2013.
15	1	One macroplot in critical habitat in the northern part of the Wilderness.
16	1	One macroplot in critical habitat in the southern part of the Wilderness.
3	2	One macroplot outside the former closure area and one inside. This is outside of critical habitat but in an area that supported plants in 2005.
4	2	One macroplot outside both former closure areas and one inside the former large central closure. This is outside of critical habitat but in an area that supported plants in 2005.
7	3	As all of this sampling area was closed between 2000 and 2013 the macroplots will be evenly distributed in critical habitat from north to south.
18	3	As all of this sampling area was closed between 2000 and 2013 the macroplots will be evenly distributed in critical habitat from north to south.
19	4	Three macroplots evenly distributed between the north and south parts of the sampling area in the critical habitat area north of the former OHV corridor to Patton Valley (with one just north of the corridor) and one macroplot in the critical habitat area south of the former corridor.
11	1	One macroplot in the critical habitat area in this sampling area.

In years with October-December precipitation less than 1.82 inches, six of the 19 selected macroplots are monitored. Table 2 lists the general locations, number of macroplots, and the criteria used to distribute these six PMV macroplots among the 10 sampling areas in the Imperial Sand Dunes.

Table 2. Monitoring macroplots to be censused in low rainfall years.

Sampling Area	Number of Macroplots	Criteria
13	0	
14	0	
15	0	
16	0	
3	1	The macroplot inside the former closure area would be monitored. The reason for this is that the area closed was chosen based on it supporting more plants in the 1998 study (Willoughby 1998).
4	1	The macroplot inside the former central closure area would be monitored. The reason for this is that the area closed was chosen based on it supporting more plants in the 1998 study.
7	1	The middle of the three macroplots in this sampling area will be censused.
18	1	The middle of the three macroplots in this sampling area will be censused.
19	2	Because of potential concerns related to the vehicle corridor to Patton Valley (closed in summer 2014) near the boundary between critical habitat subunits 3A and 3B, the macroplots just north and south of the former corridor will be censused.
11	0	

Based on these general criteria, Tony McKinney, (now retired) GIS specialist with the Carlsbad Field Office of the U.S. Fish and Wildlife Service, used the 2005 monitoring data to create specific locations for each of the 19 macroplots (Map 2). See Willoughby (2015) for the methods employed to determine specific macroplot locations. Table 3 lists the 19 macroplots and shows their location relative to the 2005 sampling areas; Map 2 depicts their locations in the Imperial Sand Dunes.

Table 3. Macroplots and their positions in the Imperial Sand Dunes. X's show the macroplots to be monitored according to the October-December precipitation threshold.

Macroplot	Sampling Area	October-December Precipitation		Location
		< 1.82 inches	> 1.82 inches	
1	13		X	In critical habitat
2	14		X	In critical habitat
3	15		X	In North Algodones Wilderness
4	16		X	In North Algodones Wilderness
5	3		X	In area never closed to OHV use
6	3	X	X	In area closed to OHV use 2000-2014
7	4		X	In area never closed to OHV use
8	4	X	X	In area closed to OHV use 2000-2014
9	7		X	In critical habitat in northern part of sampling area
10	7	X	X	In critical habitat in middle part of sampling area
11	7		X	In critical habitat in southern part of sampling area
12	18		X	In critical habitat in northern part of sampling area
13	18	X	X	In critical habitat in middle part of sampling area
14	18		X	In critical habitat in southern part of sampling area
15	19	X	X	In critical habitat just north of former vehicle corridor to Patton Valley (north part of sampling area)
16	19	X	X	In critical habitat just south of former vehicle corridor to Patton Valley (north part of sampling area)
17	19		X	In critical habitat in middle part of sampling area
18	19		X	In critical habitat in southern part of sampling area
19	11		X	In critical habitat in southern part of sampling area

A complete census of PMV was conducted in each macroplot for the following variables: (1) seedlings, (2) flowering and past flowering plants, (3) total number of plants present (4) number of plants greater than 1 year old, (5) number of plants showing damage from OHVs, and (6) number of plants showing damage from sources other than OHVs. In addition to these PMV specific variables, the number of OHV tracks was recorded, as well as any additional special status plants present in the cell. These variables were recorded separately for each 25m x 25m cell.

In 2023, the data sheets were updated to address human errors made during the 2022 census with the biggest change occurring in variable 1 and variable 2. Variable 1 category changed from “Seedlings and non-flowering plants” to “Seedlings” and variable 2 category changed from “Flowering plants” to “Flowering and Past Flowering”.

Three categories of data were collected: “PMV Plant Counts”, “Descriptive Categories (Numbers)”, and “Non-PMV”. “PMV Plant Counts” had three subcategories: “Seedlings”, Flowering and Past-Flowering”, and “Total PMV Plants”. These subcategories were the actual counts for the PMV plants observed on plot with “Flowering and Past Flowering” subcategory language updated to include PMV that had flower buds on the plant and PMV that had seed pods adjacent to the plant or were mature enough (woody stock) to be assumed having flowered in the past. “Descriptive Categories (Numbers) had three subcategories: “Greater than 1 Year”, “OHV Damage”, and “Non-OHV Damage”. These counts are a subset of the actual PMV counts and are meant to describe the PMV observed on the macroplot at the time of the survey and do not add to the overall total PMV counts. “Non-PMV” had two subcategories: “OHV Tracks” and “Other Sensitive Species”. These subcategories are separate from the main PMV count numbers and are supplemental to describe the physical and biological conditions of the surrounding plot. This language change was made to reduce confusion among new surveyors and to align the data sheets more closely with the intent of the survey. Changes were discussed, reviewed, and approved by Mary Crawford and Kent Kowalski, biologists from the USFWS.

Macroplots are located using a global positioning system (GPS) with waypoints stored in each GPS unit corresponding to the beginning and end of each 25m x 25m cell. Figure 3 shows the numbering system used in 2024.

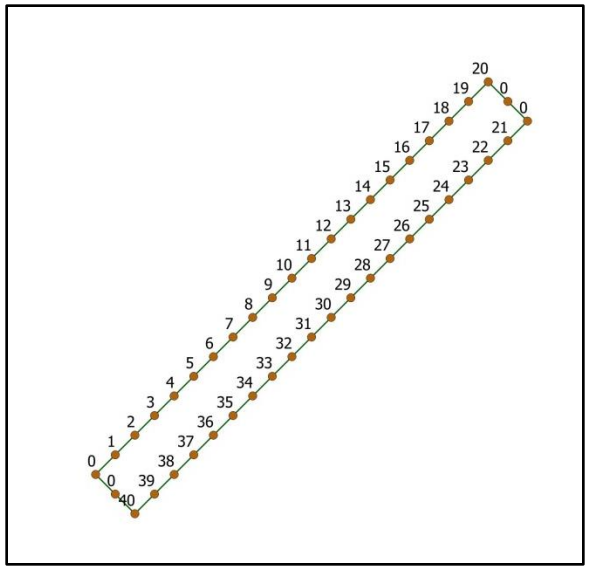

Figure 3. Waypoint numbering system used in 2024 for monitoring each macroplot. The waypoints numbered 0 are for navigation purposes only and have no data recorded for them.

3.2 Data Collection 2014-2016

During the 2014-2016 monitoring seasons the GPS-based 40 cell monitoring system was implemented. The observers began monitoring at the 0 point at the southwest corner along the upper edge of the macroplot. They then set the GPS unit to navigate towards waypoint 1. Observer 1 (with the GPS) stayed on the top (left edge) of the belt transect, while the second observer stayed 25m away from Observer 1 on the right edge of the transect (if there was a third observer, that observer traversed the center of the belt). These observers then counted and recorded the number of plants/OHV tracks in each of the specified categories for the cell ending at waypoint 1 (this is Cell 1; see Figure 2). Those values were recorded in the GPS unit as waypoint 1. The observers continued recording data for cells 2-20 (the top row of cells) and navigated down to waypoint 0 at the southeast corner of the lower edge of the macroplot. Observer 1 continued down the lower (left) edge of the macroplot while Observer 2 stayed 25m away on the right edge of the transect (which is the middle of the macroplot). This continued until the data for the last cell is recorded as waypoint 40 (this is Cell 40; see Figure 2).

3.3 Data Collection 2017-2024

The system used to collect data was modified for the 2017-2024 monitoring seasons to improve efficiency in monitoring and data-entry. Before 2017, Trimble GeoExplorer 7 GPS devices were used to navigate and record data. Data entry on the Trimble devices is non-intuitive and inflexible, leading to numerous frustrating situations. For example, while many cells exhibited zero observations of various variables (e.g., zero flowering plants in the cell), the device was not able to record a zero in any data field for a given cell. These fields had to be left blank, appearing incomplete and leading to confusion in interpreting the downloaded data. Additionally, the Trimble operating platform is complex, and for those without experience and familiarity, it can enable permanent mistakes, one of which led to the complete loss of data for three macroplots in 2016.

To overcome these problems, a new data recording technique was implemented in 2017. Trimble units were replaced with Apple iPads for field navigation and data recording. The iPads were connected via Bluetooth to a Dual Universal GPS Receiver which amplifies the GPS signal, making its accuracy comparable to that of a Trimble GeoExplorer 7. The Collector for ArcGIS application for iPad (ESRI 2016) was used to directly enter data from each cell into a custom-built ArcGIS Online database in 2022. In 2023, Field Maps, an ArcGIS application for tablets (ESRI 2023), was used to directly enter data from each cell into custom-built ArcGIS Online database. In 2024, government issued phones were used to collect data via the Field Maps application. Paper data forms were also used during the 2017-2024 surveys to backup all data collected. As a quality control measure, the data on the paper forms in 2024 were compared with the electronic data collected using Field Maps, an ArcGIS application.

A new, more precise method of circumscribing cell boundaries was also initiated in 2017. Pin flags were employed to mark a macroplot centerline at each microplot corner to help guide surveyors in counting plants. Because locating the corners of each cell was still dependent on the accuracy of the GPS units, the actual cell boundaries varied by a meter or so between years, but a source of variability (inconsistent cell boundaries) was removed through this effort.

3.4 Precipitation Data Collection

Precipitation data for the 2001-2024 growing seasons were obtained from two Remote Area Weather Stations (RAWS) in the Imperial Sand Dunes, one located in the northern half of the dunes at the Cahuilla Ranger Station near State Highway 78 on the western edge of the dunes and the other at the Buttercup Ranger Station in the southern part of the dunes south of Interstate 8. The locations of the two ranger stations are shown in Map 3.

In 2019, BLM staff collecting the RAWS data observed that the precipitation recorded from the RAWS was inconsistent with manual NOAA 4-inch rain gauges that had been established at both stations. After extensive review and discussion of the RAWS and manual rain gauge data, the BLM and the USFWS agreed that the manual rain gauge data was reliable, and that the PMV monitoring threshold for all 19 macroplots had been exceeded (Crawford). Maintenance was completed on both RAWS stations in the spring of 2020 to ensure accurate data collection in future years.

4. Results

4.1 Precipitation

From October-December 2023, a total of 1.72 inches of rain was recorded between the Buttercup Ranger Station (1.1 inches) and the Cahuilla Ranger Station (0.62 inches) RAWS rain gauges. The total average precipitation between both stations was calculated to be 0.86 inches which was below the 1.82” precipitation threshold necessary to record all 19 macroplots, thus, for the 2024 monitoring season, the BLM El Centro Field Office monitored seven macroplots initially. After initial surveys were conducted, the BLM El Centro Field Office monitored two additional macroplots (number one and two) in the north to continue collecting trend data for the most northern plots after last year’s efforts in the same plots.

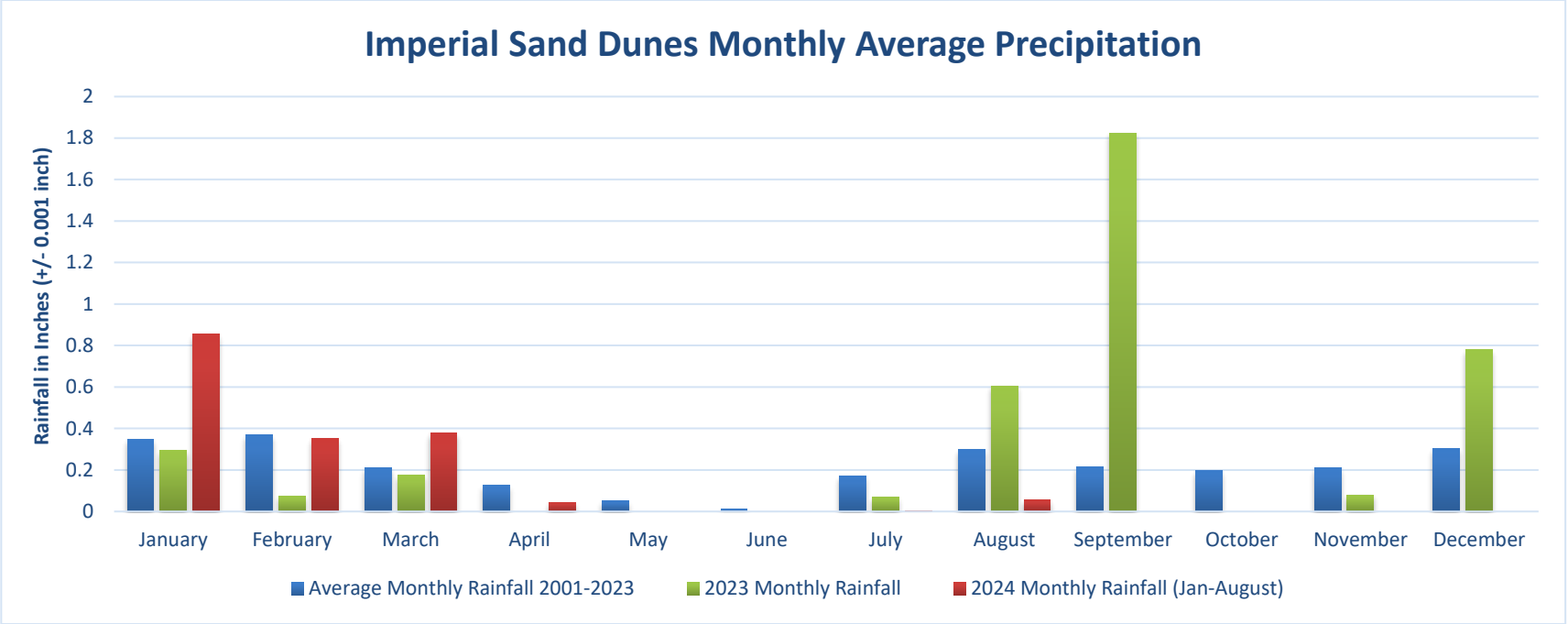

Figure 4. Average monthly rainfall for the Imperial Sand Dunes. Most of these data were recorded by the RAWS from 2001-2024; however, manual rain gauge data was used for October-December 2019. In 2023, October-December total average rainfall was 0.86 inches for the Imperial Sand Dunes, averaging station totals for those three months. From January to March 2024, the Cahuilla and Buttercup RAWS stations recorded an average total of 1.59 inches of precipitation, resulting in an average total of 2.45 inches of precipitation for the 2023-2024 growing season.

Table 4. Growing season precipitation recorded mostly by the RAWS from 2001-2024; however, manual rain gauge data was used for October-December 2019. Values for the Imperial Sand Dunes are approximated by averaging precipitation totals from the Buttercup and Cahuilla RAWS stations. The "Total Growing Season Precipitation" column is therefore the sum of the RAWS station averages for each growing season. This table represents the most complete dataset of growing season precipitation specific to the Imperial Sand Dunes since the RAWS began recording precipitation data in November 2000. Precipitation data is recorded in inches.

Growing Season	Oct-Dec Precipitation	Jan-March Precipitation	Total Growing Season Precipitation
2001-2002	0.46	0	0.46
2002-2003	0.05	1.33	1.38
2003-2004	0.195	1.17	1.365
2004-2005	2.295	2.455	4.75
2005-2006	0.02	0.195	0.215
2006-2007	0.46	0.085	0.545
2007-2008	1.405	0.505	1.91
2008-2009	0.62	0.445	1.065
2009-2010	0.145	3.3	3.445
2010-2011	1.33	0.675	2.005
2011-2012	0.93	0.54	1.47
2012-2013	0.635	0.755	1.39
2013-2014	0.425	0.03	0.455
2014-2015	0.325	0.975	1.3
2015-2016	0.215	0.5	0.715
2016-2017	1.125	1.515	2.64
2017-2018	0.005	0.2	0.205
2018-2019	1.055	0.875	1.93
2019-2020	1.87	1.545	3.415
2020-2021	0	1.24	1.24
2021-2022	0.365	0.01	0.375
2022-2023	1.64	0.545	2.185
2023-2024	0.86	1.585	2.445

4.2 Monitoring Effort

One training plot and eight macroplots were monitored from March 25 -28 and April 2, 2024 as shown in Table 5. Four to seven observers participated each day of the PMV surveys. Two macroplots were surveyed each day, except for March 25, in which only the training plot was monitored. Two of the nine plots (macroplot 1 and 2) were surveyed again this year to continue to assist with developing multiyear data trends for this area and to compare it to the other plots in low rainfall years. This decision was made in consultation with the USFWS biologists who assisted in the surveys.

Weather conditions were generally very mild during the 2024 monitoring effort. Wind speeds were low and never presented a notable problem. Temperatures generally ranged between 25-32 degrees Celsius.

Table 5. Monitoring dates and observers in 2024.

Macroplot Surveyed	Date Surveyed	Observers
19 (training plot)	3/25/2024	Arturo Casarez, Adrian Hernandez, Damian Montano, Mary Crawford, Kent Kowalski, Clarissa Diaz, Joceline Moreles, Ismael Ramirez
6, 8	3/26/2024	Arturo Casarez, Damian Montano, Ismael Ramirez, Kent Kowalski, Mary Crawford, Joceline Moreles, Adrian Hernandez, Clarissa Diaz
10, 13	3/27/2024	Arturo Casarez, Damian Montano, Ismael Ramirez, Mary Crawford, Kent Kowalski, Adrian Hernandez, Clarissa Diaz, Joceline Moreles, Taylor Liddane
15, 16	3/28/2024	Arturo Casarez, Damian Montano, Adrian Hernandez, Taylor Liddane, Michelle Lynch, Daniel Baca, Jose Caceres
1, 2	4/2/2024	Ismael Ramirez, Damian Montano, Arturo Casarez, Adrian Hernandez

4.3 Peirson's Milk-vetch

A total of 2775 PMV plants were counted during the 2024 surveys (Table 6); 2712 seedlings along with 63 flowering and past flowering plants. Of the 2775 PMV plants observed, no PMV plants over a year old were observed, however, some observed were determined to be on the cusp. This year, Macroplot 13 had the most abundant PMV count, which accounted for approximately 67.0% (1,853) of the total number of plants recorded during the survey (Fig 5). Macroplots 19 and 16 had the second and third highest number of PMV plants recorded with 247 and 226 plants observed, respectively. The lowest count of PMV were recorded on Macroplots 1 and 6 with 8 and 14 plants recorded, respectively. Macroplots 9 and 10 had the second fewest plants counted during the survey with 55 and 69 plants observed, respectively. PMV occupied 123 of 360 microplots (34.2%). Zero plants were observed with OHV damage and 90 plants were observed with Non-OHV Damage.

Table 6. A summary, by macroplot, of PMV plants counted in six categories, the number of OHV tracks, the number of cells occupied by PMV, and the number of cells with OHV tracks in 2024.

Macroplot	Date Monitored	Number of Seedlings	Number Flowering and Past Flowering	Total	Number > 1 yr	Number w/ OHV Damage	Number w/ Non OHV Damage	Number of OHV Tracks	Number of Cells Occupied by PMV	Number of Cells w/ OHV Tracks
1	4/2/2024	8	0	8	0	0	1	0	3	0
2	4/2/2024	115	0	115	0	0	2	0	11	0
6	3/26/2024	14	0	14	0	0	1	3	5	1
8	3/26/2024	55	0	55	0	0	6	0	12	0
10	3/27/2024	65	4	69	0	0	6	1	16	1
13	3/27/2024	1810	43	1853	0	0	44	0	31	0
15	3/28/2024	184	4	188	0	0	13	0	12	0
16	3/29/2024	225	1	226	0	0	5	0	15	0
19	3/25/2024	236	11	247	0	0	12	81	18	14
Total		**2712**	**63**	**2775**	**0**	**0**	**90**	**85**	**123**	**16**

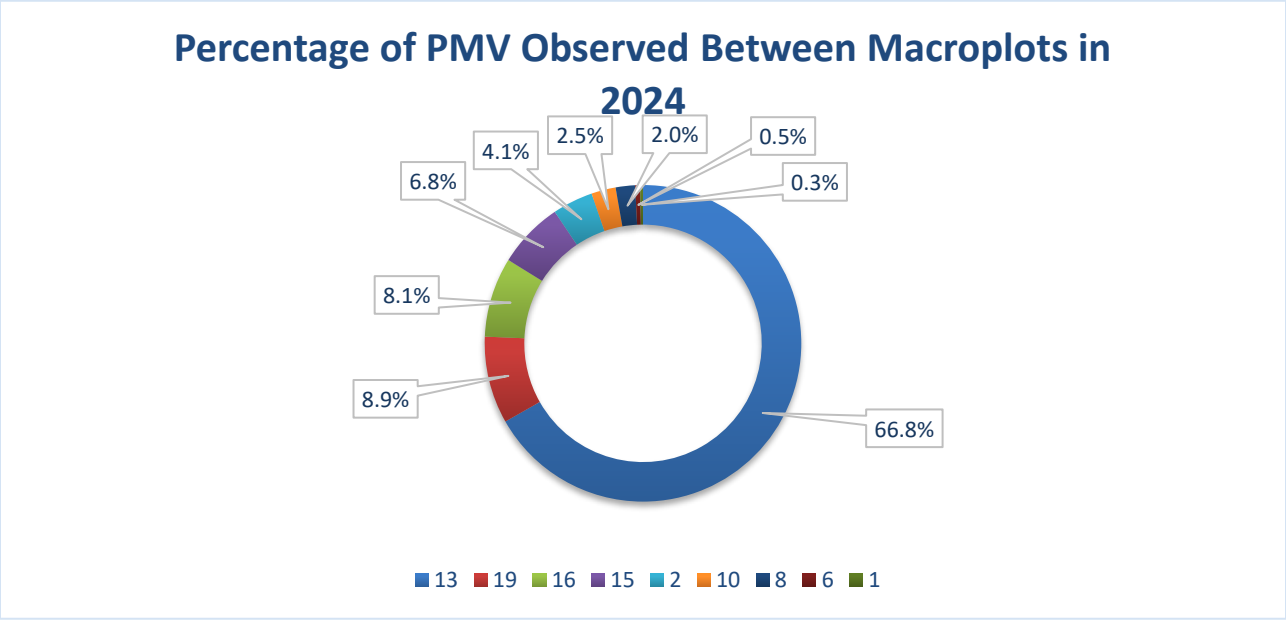

Figure 5: Percentage of PMV observed between macroplots in 2024. Macroplots are shown in order of greatest to least amount of PMV observed within the plot. The larger the percentage of PMV observed in the macroplot the larger the portion of the ring taken.

4.4 OHV Impacts and Tracks

Of the 360 microplots monitored, 16 had OHV tracks present. In total, 85 OHV tracks were recorded within the 9 macroplots. OHV tracks were not evenly distributed across the plots; Macroplot 19 had 81 vehicle tracks, constituting 95.0% of the total tracks, Macroplot 6 had three vehicle tracks, constituting 4.0% of total tracks and Macroplot 10 had 1 vehicle track, constituting approximately 1.0% of total tracks.

There was no documented OHV damage to existing PMV throughout the macroplots for the 2024 monitoring survey which is consistent with the 2020-2023 monitoring data that showed similar trends. However, during the survey for macroplot 6, there were 3-4 OHVs driving in the general area and crossed into cell #20 and cell #40, with cell #21 having PMV growing outside the boundary. OHV trespass was recorded in Macroplot 19 (closure area) accounting for 95% respectively of the total. Macroplot 19 is located along

the border and OHV trespass may be attributed to activities conducted by United States Border Patrol and/or OHV recreationists which is consistent with last year's data.

During the 2023-2024 OHV season, BLM ECFO assigned two signing crew to conduct post-holiday incident closure violation patrol to determine areas that had been breached during a holiday incident (Halloween, Thanksgiving, New Years, and/or President's Day). Due to changing priorities, funding and staff availability, the crew was only able to conduct this post-holiday incident patrol directly after the Thanksgiving incident and only on the West side of the central closure area. The signing crew was able to identify OHV tracks that recently crossed into the closures (the day after mass exodus from ISDRA) that spanned along the southern portion of the central closure (Map 5). The current PMV monitoring is a point in time survey and does not consider OHV impacts outside of this timeframe as tracks and/or damaged plants can be blown away in the wind months prior to the survey occurring. OHV incursions into PMV critical habitat after a holiday may be significant, but no data exists at this time nor has the BLM been able to consistently monitor for post-holiday OHV incursions.

4.5 Non-OHV Impacts

90 plants were observed with non-OHV damage (insect, climate and/or human). All macroplots in the 2024 monitoring session recorded PMV plants with non-OHV damage with Macroplots 13, 15, and 19 having the most documented (Fig 8). 87.7% (80 PMV) of the PMV plants documented with non-OHV damage were confirmed to be from insects, 8.88% (7 PMV) were confirmed to be from desiccation and about 2.22% (two PMV) were from an unknown source after being identified by USFWS and BLM biologists on the survey team (Fig 6 and 7). Macroplot 1 and 2 have only been surveyed when the precipitation threshold of 1.82 inches of rain is reached or when BLM determined the need for more surveys, which occurred in the 2020, 2023 and 2024 PMV surveys. In 2020, surveyors did not record any PMV plants with Non-OHV damage on Macroplots 1 and 2 (Table 7). For the past five years there has been a general downward trend in the number of PMV plants recorded with Non-OHV damage, however, this could be due to the large quantities of PMV recorded in 2019-2021 that made it logistically challenging to accurately account for Non-OHV damage and/or the general decrease in the number of PMV observed on plots. In 2024, the trend went upward possibly due to the increased number of PMVs present at the time of the survey (Fig 9).

Table 7: A summary of PMV plants counted under the "Non-OHV Damage" sub-category in Macroplots 1, 2, 6, 8, 10, and 13 by year from 2019-2024.

Year	Macroplot 1	Macroplot 2	Macroplot 6	Macroplot 8	Macroplot 10	Macroplot 13	Macroplot 15	Macroplot 16	Macroplot 19	Total
2019	NA	NA	0	0	12	4	0	0	10	26
2020	0	0	0	0	0	0	0	0	3	3
2021	NA	NA	0	0	0	0	0	0	0	0
2022	NA	NA	0	0	0	0	0	0	0	0
2023	13	1	0	0	0	0	0	0	1	15
2024	1	2	1	6	6	44	13	5	12	89

Figure 6: Left and Right photos of PMV seedlings found on plot with signs of desiccation occurring on the stems and leaves of current growth. Photos taken by Ismael Ramirez, NRS BLM.

Figure 7: Left photo taken of a PMV greater than 1 year old found outside of Macroplot 1 with black ants on the stems and ground. A black ant is seen at the bottom of the photos dragging a PMV seed into its burrow. Right photo was taken of a PMV seedling found on plot with an unknown insect found buried at the base of the PMV seedling. The PMV seedling has small bite marks that indicate insect damage. Photos taken by Ismael Ramirez, NRS BLM.

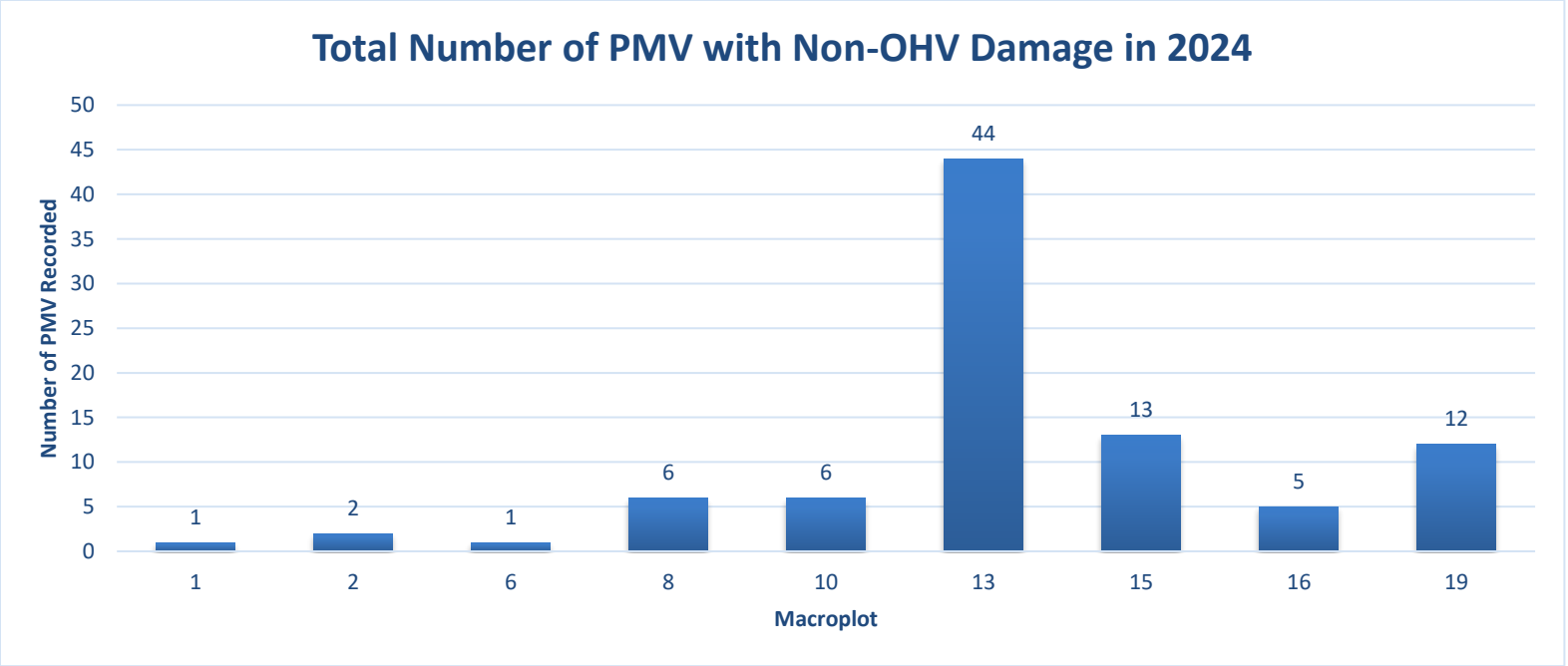

Figure 8: Total number of PMV observed with Non-OHV damage in 2024. Macroplots 1 and 2 are usually only recorded during periods where a full survey effort is conducted (1.82" precipitation threshold is met). Data for Macroplot 1 and 2 were recorded in 2020 (threshold met), 2023, and in 2024 (decision by BLM ECFO staff in consultation with FWS),

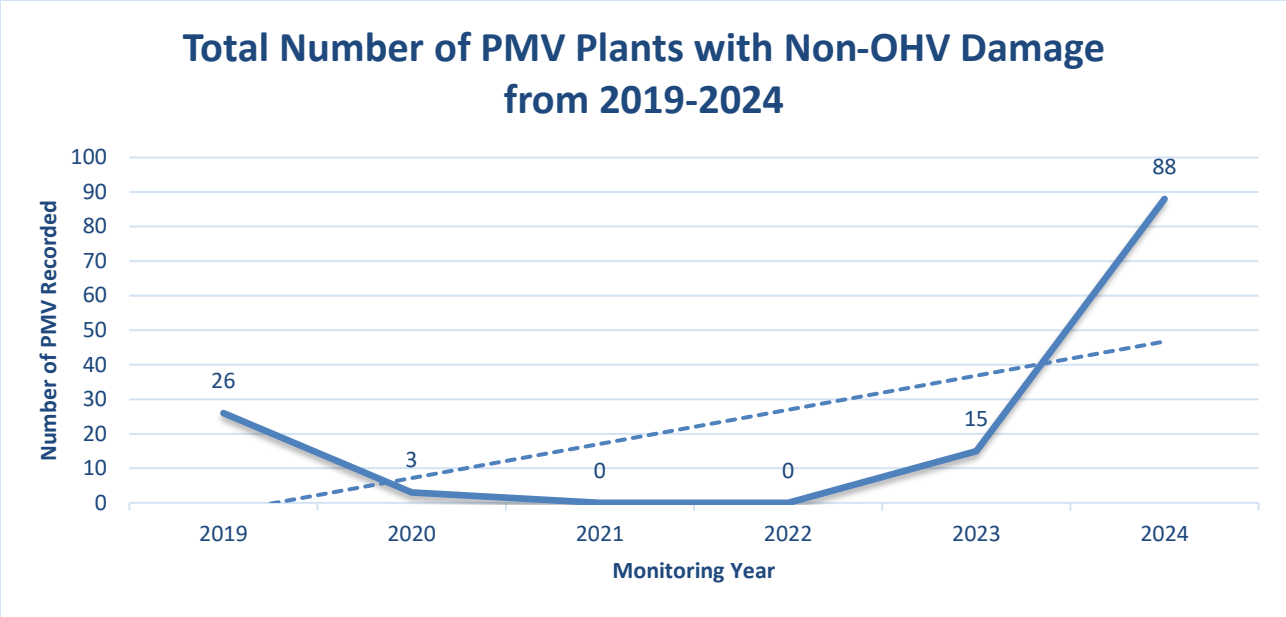

Figure 9: Total Number of PMV plants with Non-OHV damage from 2019-2024 under the "Non-OHV Damage" subcategory trend lines. Macroplots 1 and 2 are usually only recorded during periods where a full survey effort is conducted (1.82" precipitation threshold is met). Data for Macroplot 1 and 2 were recorded in 2020 (threshold met), 2023, and in 2024 (decision by BLM ECFO staff in consultation with FWS), no data exists for 2019, 2021 or 2022. Data has been recorded for Macroplot 19 for the past 5 years of the survey as part of the normal protocol.

5. Discussion

5.1 Distribution and Abundance

Suitable habitat for PMV within the Imperial Sand Dunes only exists within the simple crescentic dunes on the western side of the dune system and in the compound crescentic dunes in the center of the dune system (Willoughby 2005b). On a microhabitat scale, PMV occurs primarily on northwest facing, windward dune slopes with a 5°-15° angle and in dune bowls where there is less sand movement and more consistency in dune topography. Dune slip faces and dune crests are often not suitable for the species, as these areas change rapidly with the wind and experience continual sand movements, some of which can dramatically alter PMV habitat.

While the macroplots used for monitoring were selected based on the presence of PMV, during any given monitoring year a large percentage of each macroplot may not be suitable for PMV occurrence given the current microhabitat and dune topography. In 2024, of the 40 cells within each of the 9 monitored macroplots, an average of 16 cells were occupied with PMV (Table 8). PMV presence has increased throughout all plots surveyed in 2024, except for Macroplot 1 which recorded only eight PMV this year compared to 37 in 2023 (Figure 10).

In 2024, Macroplot 13 had the highest number of cells occupied by PMV which is consistent with previous surveys, except in 2023 (Table 8). Macroplot 13 had 31 cells occupied by PMV plants with an average of 60 PMV plants per occupied cell. Macroplots 19 and 10 had the 2nd and 3rd highest number of cells occupied by PMV plants (18 and 16 respectively) with an average number of 15 and 4 PMV plants per occupied cell. This suggests, among other factors, that during the 2024 growing season Macroplot 13 contained a higher percentage of suitable habitat for PMV, Macroplots 19 and 10 having 2nd highest percentage of suitable habitat. This is likely influenced by the amount of suitable habitat present in these plots, though many other factors may contribute to these numbers. Figure 8 illustrates the distribution of recorded PMV individuals between macroplots.

Table 8. A summary of the number of cells occupied with PMV by macroplot as well as the average number of PMV per occupied cell in 2024. Averages are rounded to the nearest whole number.

Macro Plot	Number of Cells Occupied by PMV	Avg Number of PMV per Occupied Cell
1	3	3
2	11	10
6	5	3
8	12	5
10	16	4
13	31	60
15	12	16
16	15	15
19	18	14
Avg Total	16	14

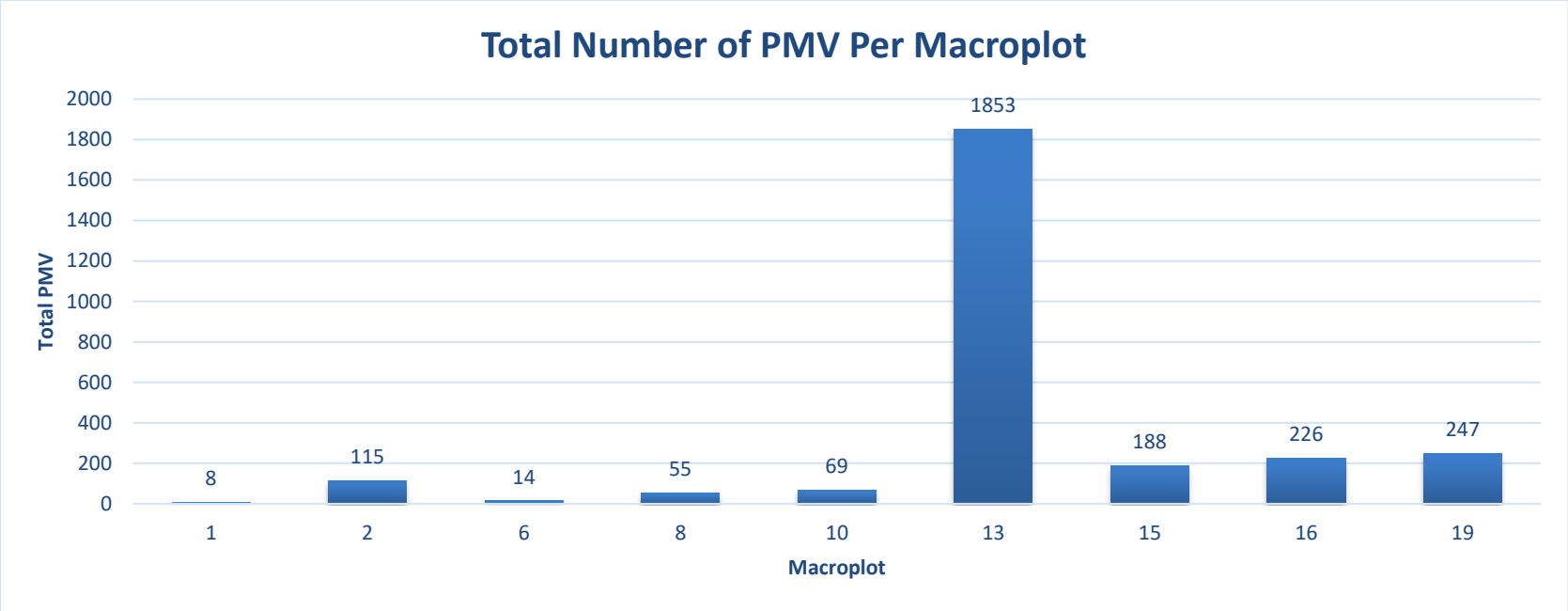

Figure 10: Total number of PMV recorded in 2024 by macroplot. Macroplots are shown in ascending numerical order which corresponds to their location in the Imperial Sand Dunes on a north-south axis with macroplot 1 being the northernmost plot and macroplot 19 being the southernmost.

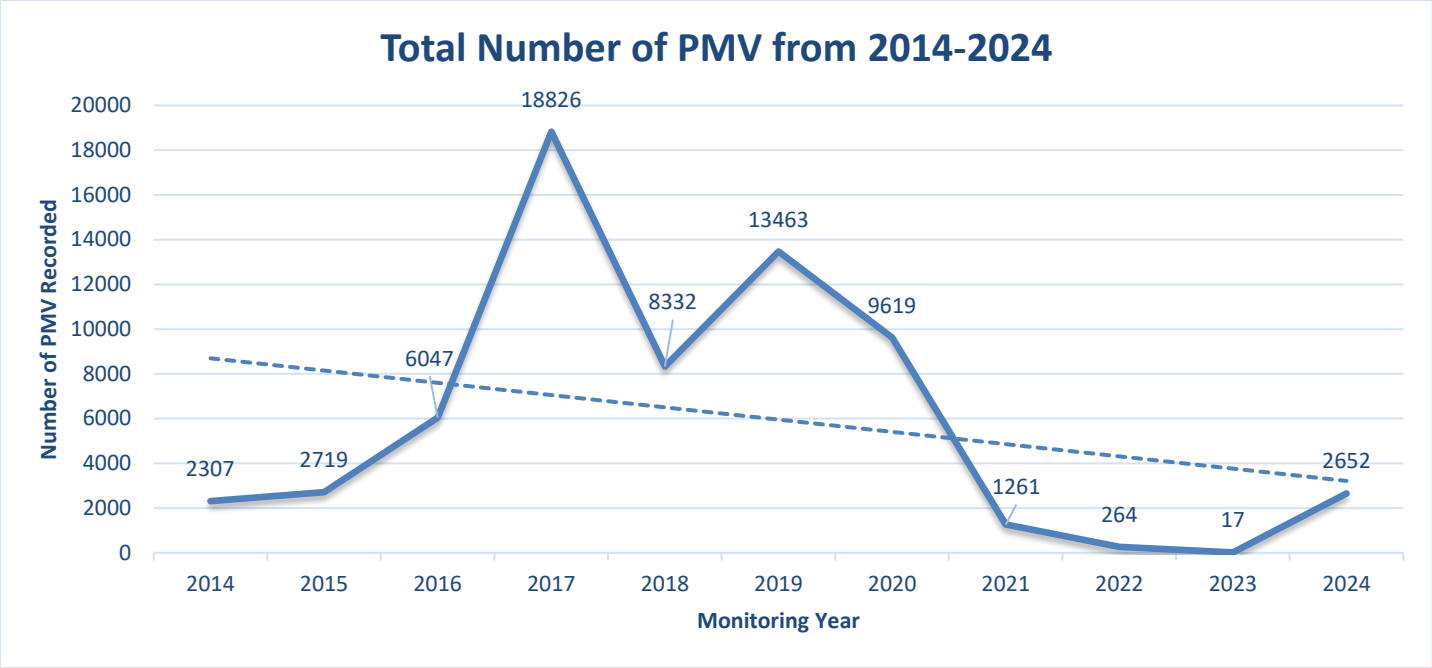

Figure 11: Total number of PMV observed between 2014 to 2024. A downward trend has been generally observed since 2019, however, in 2024, this trend started to reverse.

There was zero PMV greater than 1 year old observed during this year's surveys (Fig 12). In 2023, Macroplot 1 had 29 PMV documented greater than 1 year old which comprised approximately 96.6% of the total from that year's survey. However, no PMV individuals recorded last year in Macroplot 1 were documented in 2024.

Due to the extreme differences in the total numbers of PMV present in each macroplot, the raw abundance of PMV individuals older than 1 year by macroplot is not a representative metric of PMV survivability within each plot. PMV survivability is more effectively determined by comparing the percentages of PMV individuals older than one year relative to the total number of PMV individuals recorded in each plot the previous year (Figure 13). Using this metric, survivability was found to be 0% in 2024 compared to the macroplots that were surveyed in 2023 (Figure 13). These plots represent areas spread throughout the entire dune complex and do not illustrate any trend. Factors that may influence PMV survivability are dune movement and disturbance, reduced resource competition between PMV individuals, and differences in microclimate and weather conditions.

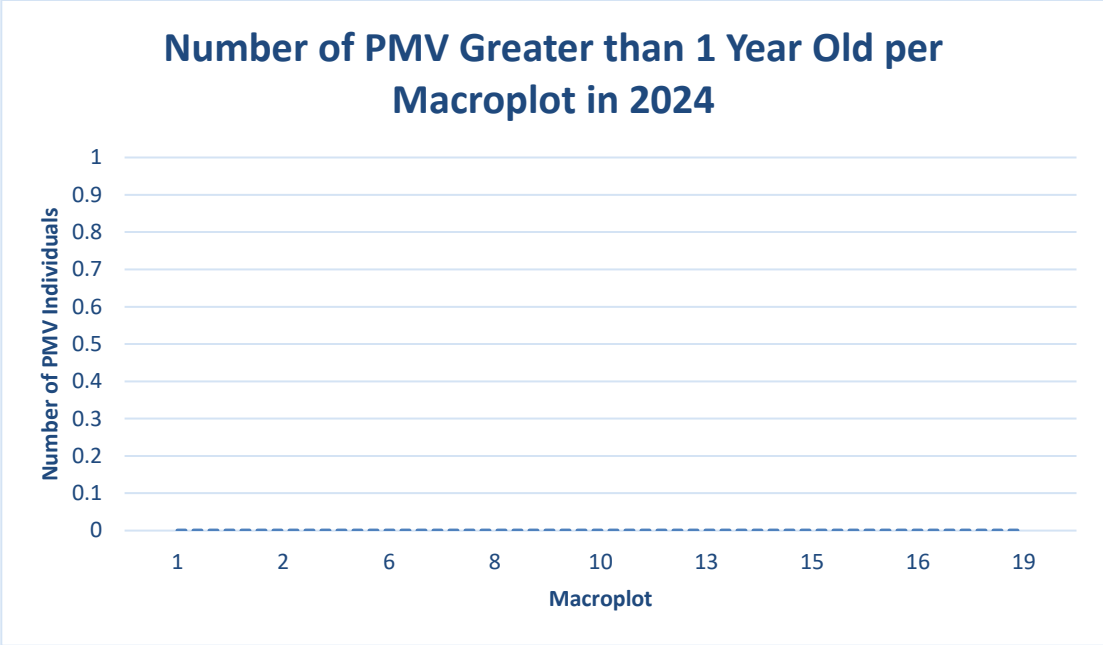

Figure 12. Total number of PMV plants greater than 1 year old recorded in 2024 by macroplot. Zero PMV plants were found to be greater than 1 year old, however, a handful of PMV were determined to be on the cusp of this cut-off. It was decided to not count them under this category due to a lack of strong characteristics leaning toward greater than one year old. Macroplots are shown in ascending numerical order which corresponds to their location in the Imperial Sand Dunes on a north-south axis with Macroplot 1 being the northernmost plot and Macroplot 19 being the southernmost.

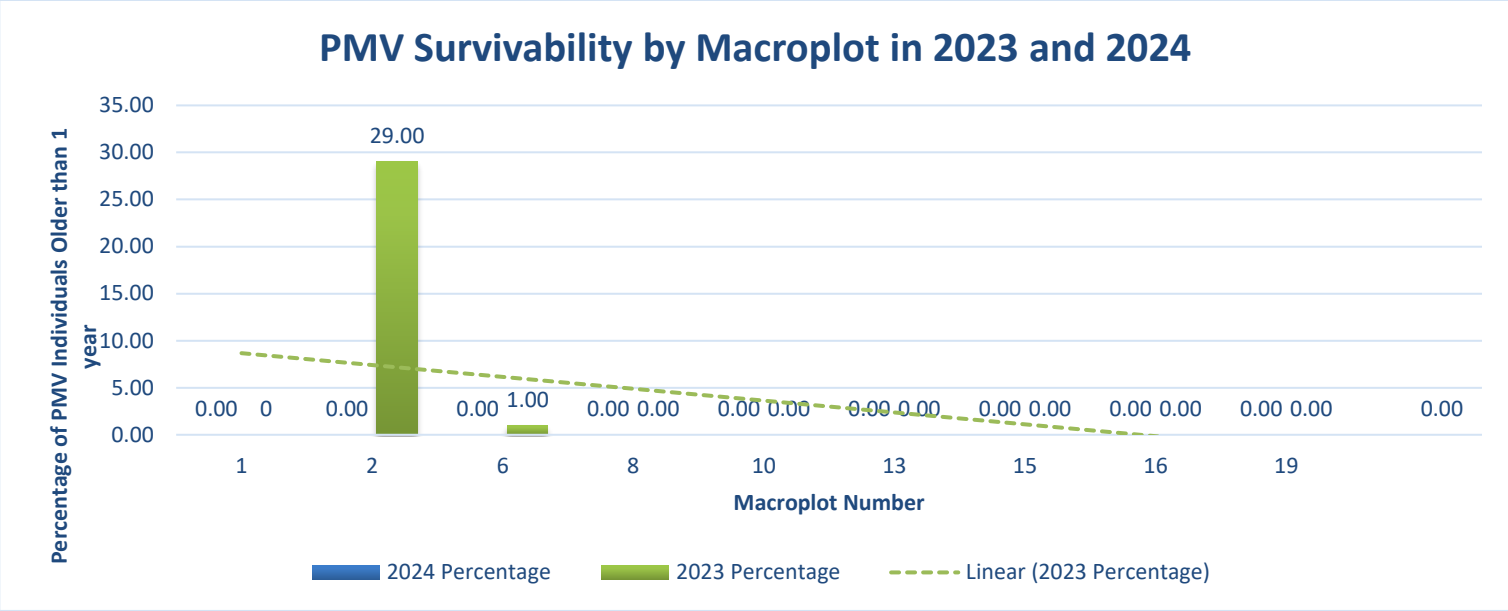

Figure 13. 2024 PMV survivability displayed using percentages of PMV individuals older than 1 year relative to the total number of PMV individuals in each macroplot in 2023. Macroplots are shown in ascending numerical order which corresponds to their location in the Imperial Sand Dunes on a north-south axis with Macroplot 1 being the northernmost plot and Macroplot 19 being the southernmost.

The 2005 dune wide sampling effort (Willoughby 2005) suggested that there is a north-south gradient in terms of number of plants present, with the southern part of the Imperial Sand Dunes system supporting more plants than the northern portion. The 2024 monitoring data may support this hypothesis with the southernmost Macroplots (13, 15, 16 and 19) having higher PMV counts than the northernmost Macroplots (1, 2, and 6) (Figures 8). The highest PMV counts are in Macroplots 13, 19, 16, and 15 which are located throughout the southern and central portions of the dunes. This is on trend with previous years' data (not including 2023), as Macroplot 13 historically exhibits the highest number of individual PMV.

5.2 Stage-class Composition

The 2024 monitoring efforts recorded unequal amounts of seedlings and flowering/past flowering, with seedlings accounting for approximately 98% of the total PMV plants observed this season (Figure 12). This is consistent with the previous 5 years of monitoring (minus 2023) where seedlings would make up the majority of the total PMV plant observed. PMV germination in any

given year is dependent on rainfall. While seedling germination occurs because of October through December rainfall, January to March precipitation generally helps to maintain further plant growth and support flowering of PMV.

The 2024 monitoring efforts recorded 63 PMV "Flowering and Past Flowering". Macroplot 1, 2, 6, and 8 had zero PMV plants observed under the "Flowering and Past Flowering" subcategory. This is a significant drop in numbers compared to the 2022 and 2021 survey results which had PMV plants under the "Flowering" in at least every single macroplot. Differences in distribution of flowering PMV individuals could be due to dune movements, climatic and weather conditions, or resource competition within the vegetative community.

It is also important to note that this year's monitoring effort ended in April and included plots in the northern portion of the dunes, where PMV often continue to flower into early to mid-April. All of the PMV plants observed under the "Flowering and Past Flowering" subcategory were found in Macroplots 10, 13, 15, 16 and 19. Rainfall was recorded during the January – March season with an average total of 1.585 inches.

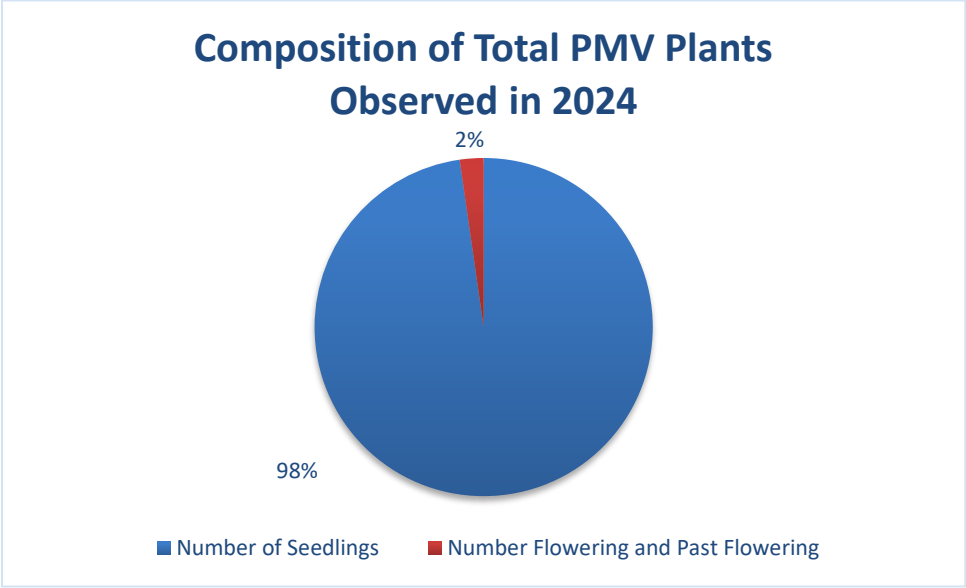

Figure 14: Composition of total PMV plants observed in 2024 monitoring season. Approximately 98% of the total PMV observed in 2024 were seedlings with 2% falling under the flowering and past flowering category.

5.3 Survivorship and Recruitment

Compared to previous years, there was notably increased recruitment in 2024, with 2,712 seedlings accounting for approximately 98% of the overall plants. This change in recruitment in 2024 is interesting to note since the past three years of monitoring have shown a declining trend of recruitment and survivorship (Fig 11).

Porter et al. (2005) and Phillips and Kennedy (2005) noted that PMV possesses two different strategies for seed production. Plants that flower early in the growing season have time to flower and set seed during the same season. Porter et al. states there is approximately 90 days between germination and flowering. Plants that germinate later in the growing season do not flower in that growing season. Rather, they depend upon surviving through the summer to flower and produce seeds in the subsequent growing season. The former strategy appears to produce the largest quantity of seed simply because the numbers of same-season flowering plants are much higher (Phillips and Kennedy 2005 and 2006; Willoughby 2005 and 2006), but the latter strategy certainly also works to put seeds into the seed bank. Although one year old and older plants are normally far fewer, they produce much more seed per plant than same-season flowering plants (Porter et al. 2005, Phillips and Kennedy 2005).

Survivorship in 2024 had 0 surviving plants “Greater Than 1 Year” old (0.00%) in the original seven macroplots surveyed every year, a significant drop compared to the 37 individuals observed in 2023 (Figure 13) but this could be expected given the extremely low number of overall plants recorded that year. Mortality was likely a result of many different factors including climate and weather conditions, resource competition within the vegetative community, and movement and alteration of dune habitat.

5.4 Impacts to Peirson’s Milk-vetch

The limited distribution and habitat requirements of PMV makes this species vulnerable to any impacts present within their range. Potential impacts include, but are not limited to, climate and weather conditions, anthropogenic disturbances, resource competition within the vegetation community, and insect infestations and herbivory. Under the right circumstances, any one of these factors can detrimentally impact PMV populations.

Surveys since 2014 have illustrated that PMV recruitment and mortality can vary considerably from year to year due to several factors that can both positively and negatively impact the species. Climate and weather are likely the largest contributing factor to PMV population fluctuation. In 2018 and 2021, high PMV mortality and low recruitment were observed following notably low rainfall during the first half of the growing season (Bruner 2018). Conversely, high rainfall in the 2019 and 2020 growing seasons yielded increased seedling recruitment and allowed for several PMV to flower and produce seeds. These data illustrate how sensitive PMV

populations are to climatic changes, which are common in the dynamic and often hostile dune environment. Recruitment and survivorship become especially important when environmental stressors persist for more than one season. For example, severe drought can greatly impact this species, particularly if drought persists for consecutive years.

The Imperial Sand Dunes are a popular OHV recreation use area. Two of the macroplots monitored in 2024 are located within open OHV use areas (plots 6 and 8), while the remaining macroplots are in areas closed to OHV use. Since 2014, the total number of OHV tracks recorded during the monitoring season has fluctuated between 75 and 396. In 2022 Macroplots 6 and 8 recorded approximately 109 and 166 OHV tracks respectively and in 2023 observations were similar with Macroplots 6 and 8 recording 73 and 196 tracks respectively. In 2024, Macroplot 6 recorded approximately three OHV tracks accounting for all OHV tracks observed in an open area or approximately 4% of the total OHV tracks observed in 2024 (Figure 15).

In 2019, 75 OHV tracks were recorded within the closure areas (90% of all tracks recorded). In 2020, a somewhat reduced percentage of trespass OHV use was recorded, with 62.3% of all tracks observed within closure areas (Figure 16). In 2021, no OHV trespass was recorded within closure areas, however, PMV monitoring is conducted over the course of a few days and may not capture OHV trespass before and after the survey due to winds shifting tracks and sand in the dunes. It is possible that OHV trespass occurred in 2021 based on historical data. In 2022, Macroplot 19, which is closed to OHV use, recorded 13 OHV tracks and accounted for about 4.5% of the total OHV tracks recorded. This data showed an increase in OHV activity in closure areas since 2019. In 2023, Macroplots 10, 16 and 19 showed an increase in OHV tracks recorded with macroplot 10 having 2 tracks (0.005%), Macroplot 16 having 24 tracks (0.06%) and Macroplot 19 having 101 tracks (25.5%). In 2024, Macroplot 10 and 19 continued to have OHV tracks present on plot with Macroplot 19 having 81 tracks (95.3% of total OHV tracks observed) and Macroplot 10 having one OHV track (1%) (Figure 13 and 14). No OHV damage was recorded on PMV plants for the 2024 survey (Figure 17).

It is important to note that outside of direct damage to plants, OHV use can impact plant populations through increased erosion; the indirect nature of these impacts make them difficult to quantify. Further information is needed to adequately assess these potential impacts.

Macroplot 19 is in the southernmost PMV critical habitat closure area (Map 2). This closed section of critical habitat totals approximately 218 acres and runs parallel to the international border between the United States and Mexico. Border Patrol was not encountered during the 2024 surveys, however, significant two-wheel tracks were found throughout Macroplot 19. BLM has communicated the presence of PMV critical habitat in this area.

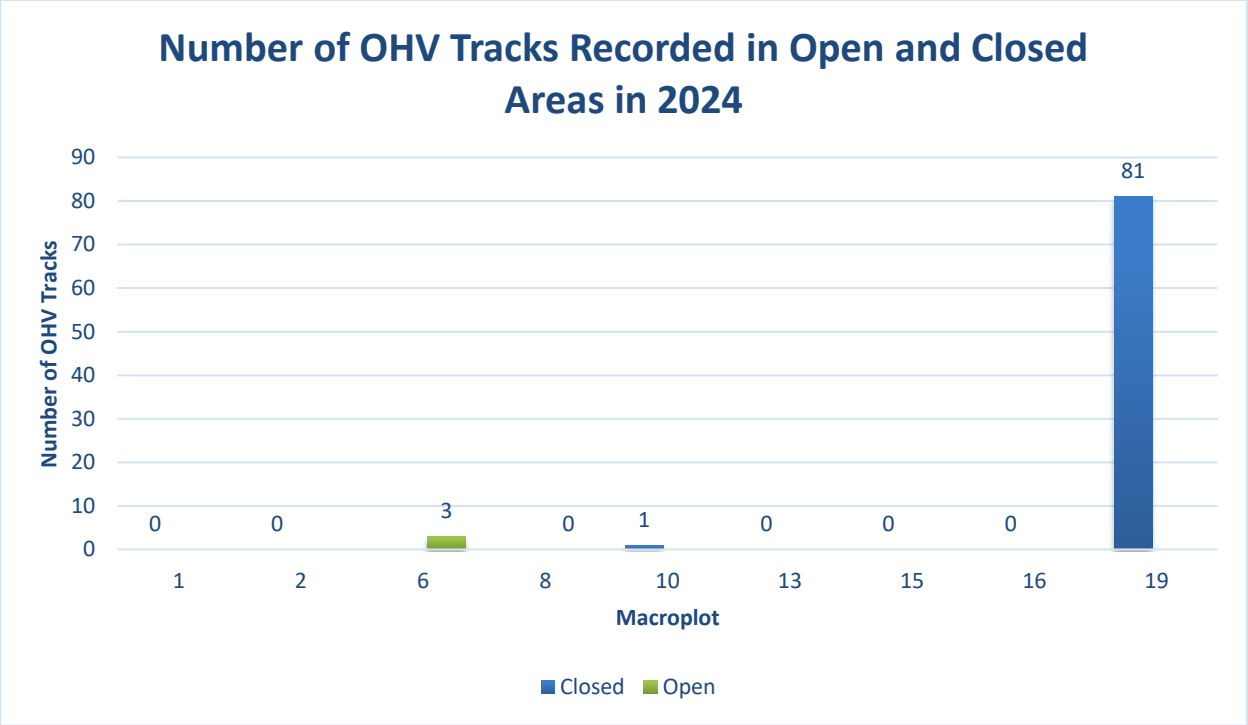

Figure 15. Number of OHV tracks recorded by macroplot in 2024. Macroplots 6 and 8 are open to OHV use while Macroplots 1, 2, 10, 13, 15, 16 and 19 are closed to OHV use.

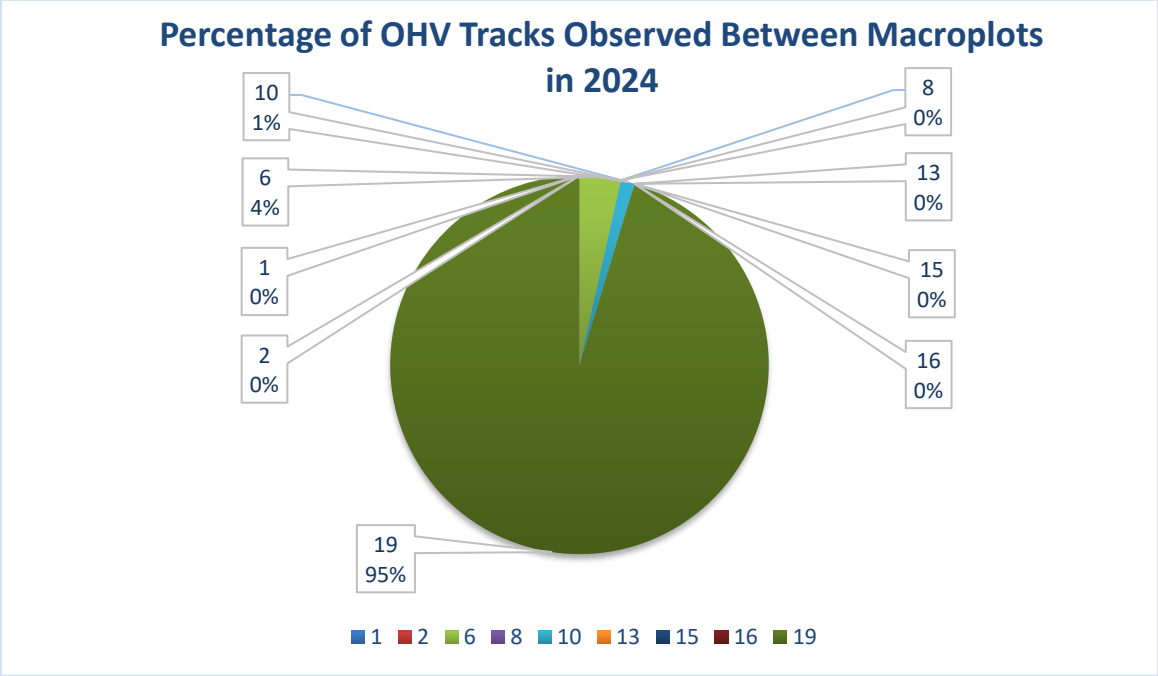

Figure 16: Percentage of OHV tracks observed between macroplots in 2024. Top number is the macroplot number and bottom number is the percentage of tracks observed within that macroplot to help visualize the breakdown of OHV tracks observed. Macroplot 19 makes up approximately 95% of the total OHV tracks observed with Macroplot 6 and 10 representing approximately 4.0% and 1.0%.

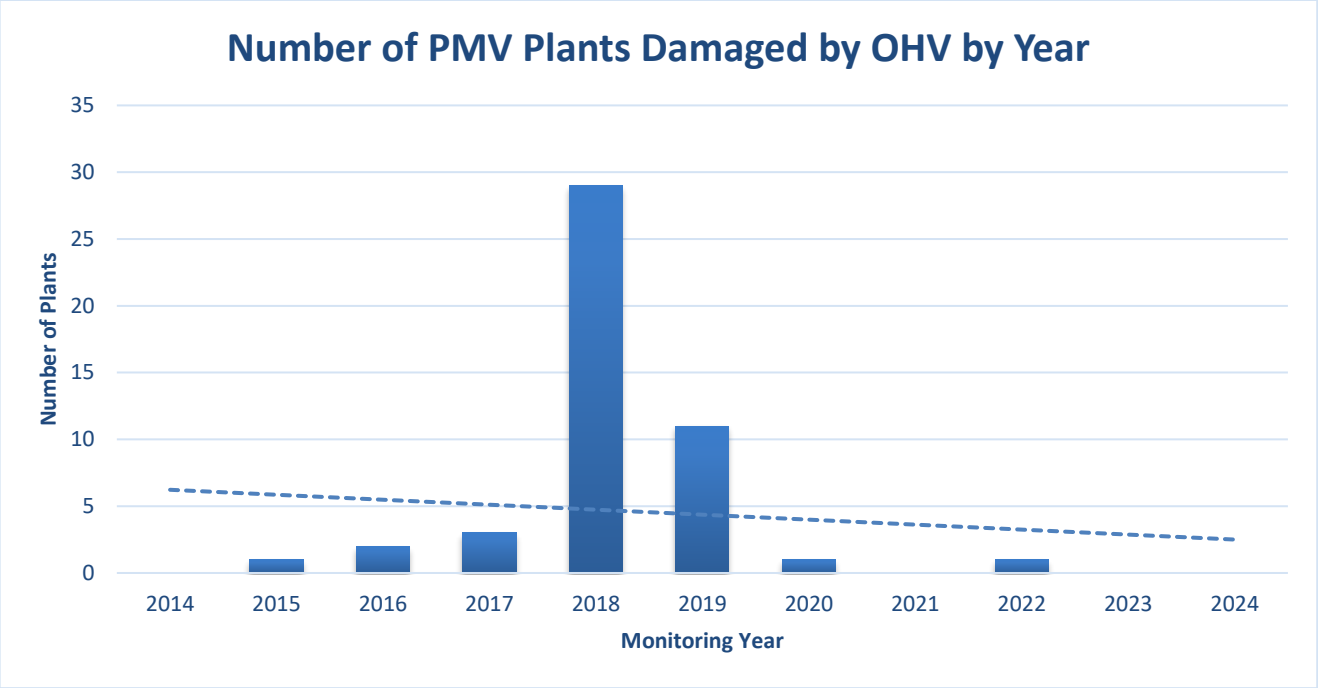

Figure 17. Number of PMV damaged by OHVs by monitoring year. Note that these totals include the additional 13 macroplots monitored in 2020 and the additional 2 macroplots monitored in 2023 and 2024.

There is the potential for other impacts to detrimentally affect PMV populations (e.g., trampling). During previous years surveys, PMV have been stepped on by observers; this was most common during training activities. However, foot trampling is not likely to notably impact PMV populations due to the limited accessibility of the closure areas within the dunes. Additionally, aphids have been observed on PMV in previous years, suggesting there may be a risk of disease and herbivory. Aphids appeared to be attracted to mature plants more so than seedlings. It is not known to what extent PMV is affected by insects; further study is needed to fully understand their impact.

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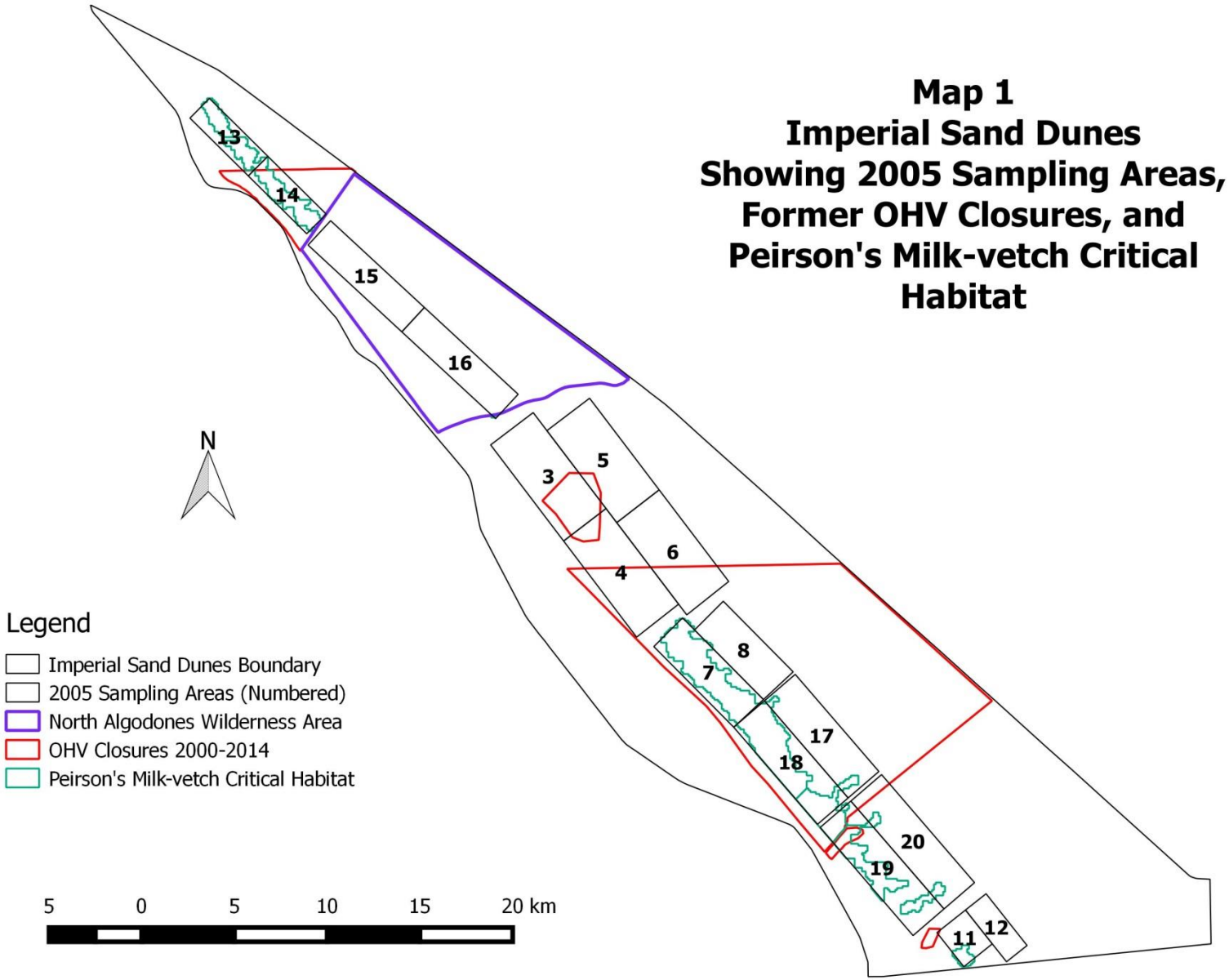
Map 1
Imperial Sand Dunes
Showing 2005 Sampling Areas,
Former OHV Closures, and
Peirson's Milk-vetch Critical
Habitat
N
Legend
Imperial Sand Dunes Boundary
2005 Sampling Areas (Numbered)
North Algodones Wilderness Area
OHV Closures 2000-2014
Peirson's Milk-vetch Critical Habitat
5 0 5 10 15 20 km
13
14
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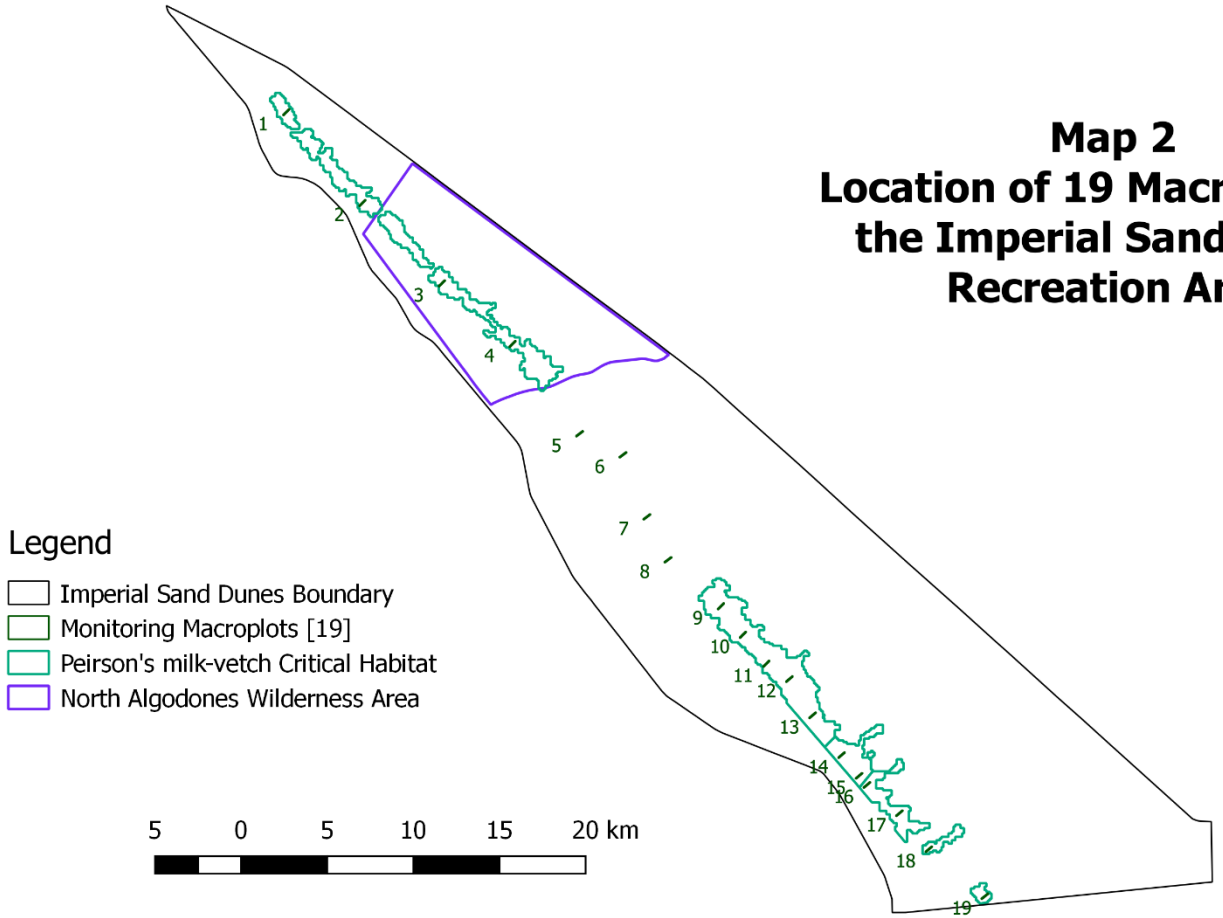
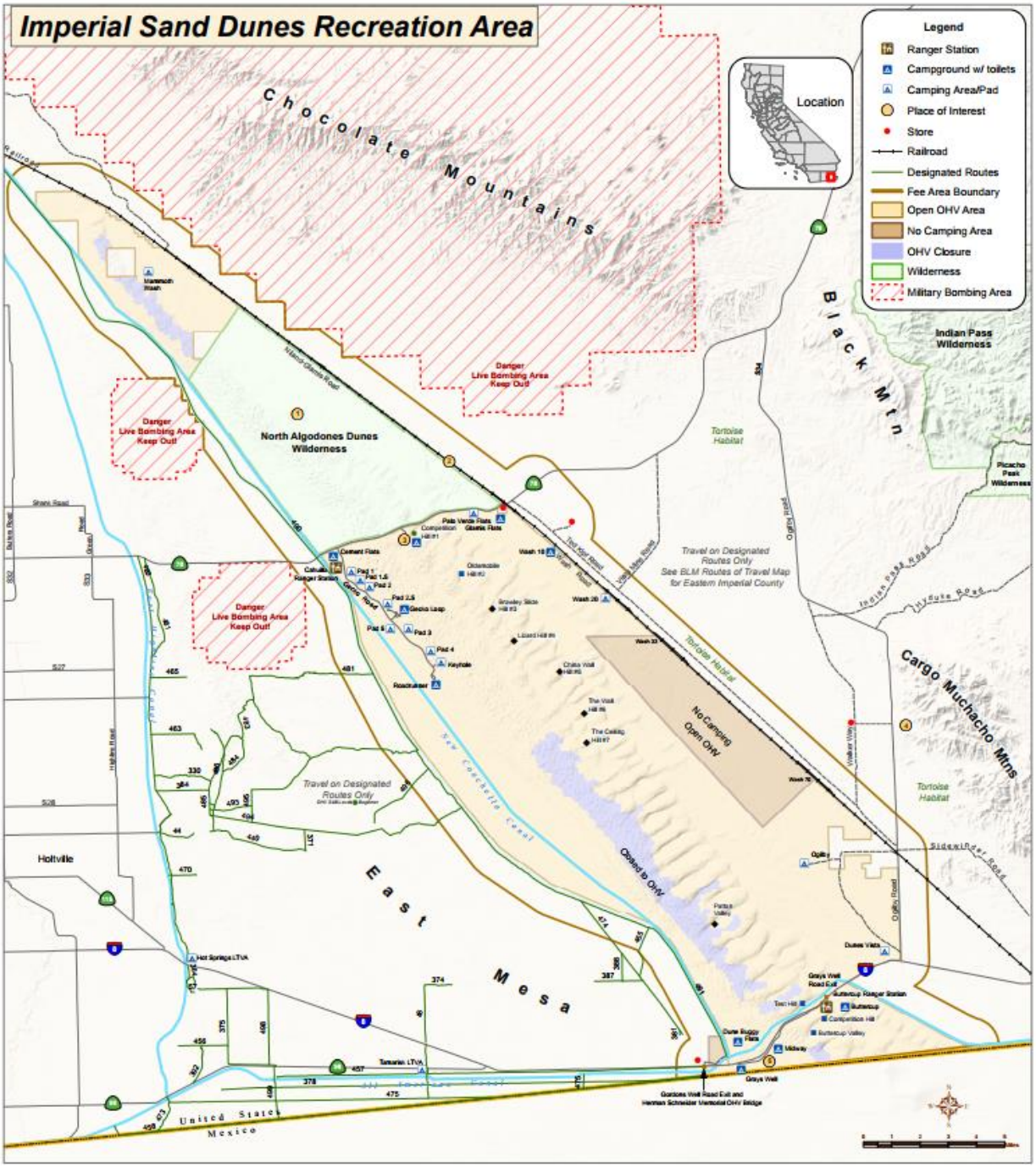
Map 2
Location of 19 Macroplots in the Imperial Sand Dunes Recreation Area

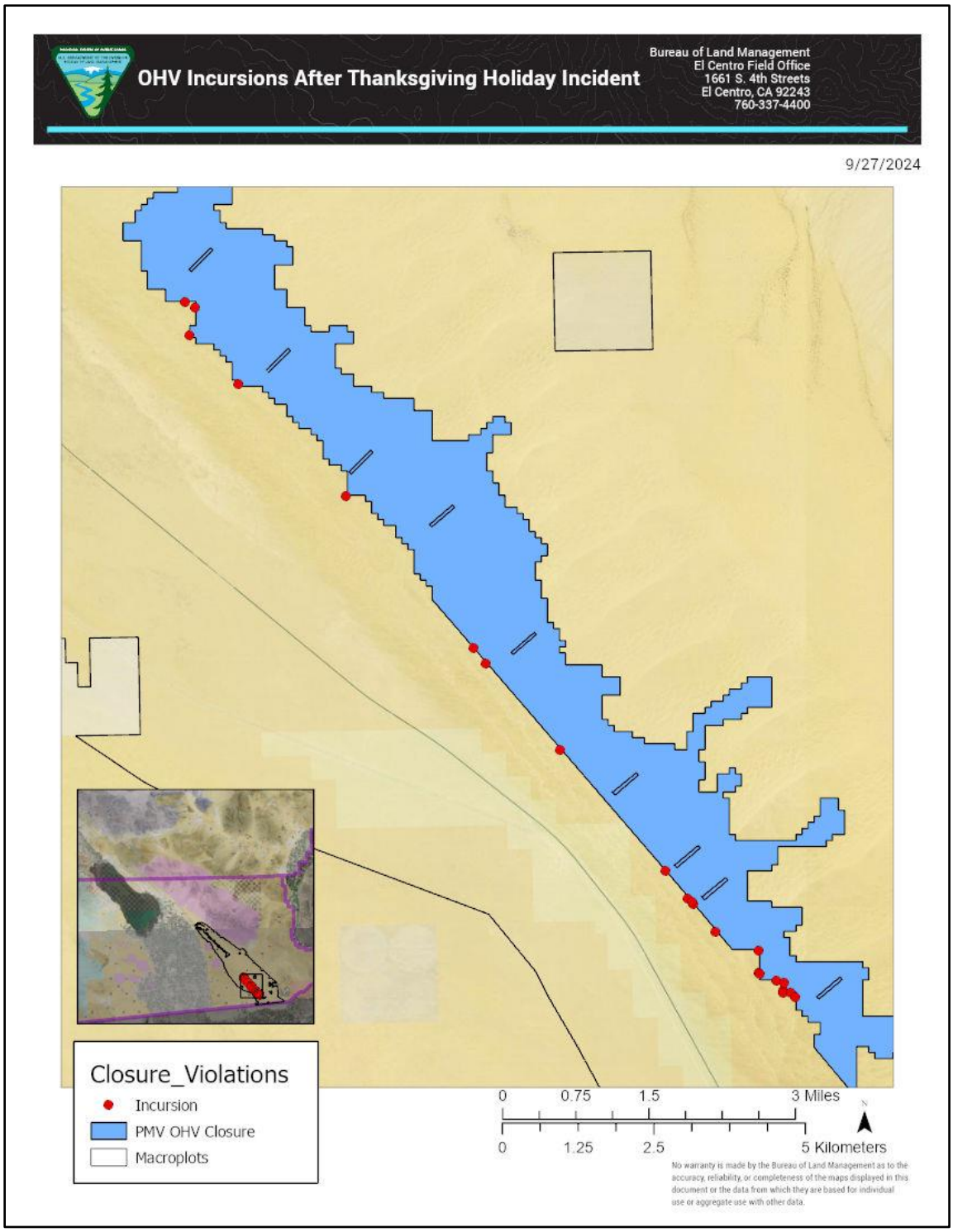


Map 3



Location of Visitor Facilities Including Buttercup and Cahuilla Ranger Stations in the Imperial Sand Dunes Recreation Area

Map 5



Map of Critical Habitat OHV Violations Observed Post-Thanksgiving Holiday Incident, 2023