

**UNITED STATES DEPARTMENT OF THE INTERIOR
OFFICE OF HEARINGS AND APPEALS
BOARD OF LAND APPEALS**

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)	IBLA Docket No. IBLA-2021-0313
FRIENDS OF THE NORTH COAST,)	
DAVENPORT NORTH COAST ASSOCIATION,)	
and RURAL BONNY DOON ASSOCIATION,)	DECLARATION OF
)	COLIN HANNON
Appellants.)	IN SUPPORT OF
)	MOTION FOR STAY
)	

I, Colin Hannon, declare as follows:

1. I am a homeowner residing in the New Town area of Davenport where I live with my wife and two elementary school-aged children. Our children do walk to school and to the beach on Cement Plant Road as do we and many other New Town and Davenport families, as I have personally observed.

2. I am a regular volunteer with Davenport North Coast Association (DNCA) and I have participated in the RMPA/EA process for Cotoni-Coast Dairies in a constructive manner. I have noticed that Traffic Engineer Keith Higgins commented on March 16, 2020 regarding the impacts of the increase of traffic on Cement Plant Road which will result from BLM's proposed Parking Lot at Warrenella Road Gate and subsequently his Peer Review of the BLM Final Traffic Study was submitted to BLM on August 17, 2020. The Peer Review stated that those impacts had not been addressed in the BLM Traffic Study and pointed out that the traffic generation projection undercounted for various reasons.

3. I participated in the efforts of DNCA Board member Michael R. Eaton to depict the visual impacts on New Town of BLM relocating the Access to the Warrenella Gate Parking Area to be very near the intersection of Warrenella Road and Cement Plant Road. I have viewed

1 Photo 14 attached to the Declaration of Michael R. Eaton and can confirm that it accurately
2 depicts the view New Town residents will have of the Warrenella intersection and BLM Access
3 drive area. For much of the year the high weeds shown in Photo 14 are not present. The area
4 depicted is projected by BLM to handle 150,000 to 250,000 visitors annually. This concentrated
5 addition of 150,000 to 250,000 visitors (and corresponding vehicles) adjacent to New
6 Town/Davenport at a singular parking area/trailhead will greatly interfere with the peaceful
7 enjoyment of the New Town/Davenport community members' own lands. I have personally
8 observed regular use of the Warrenella intersection by tractor-trailers for logging, agriculture,
9 ranching, and other purposes. New Town residents will definitely be adversely impacted by the
10 visible and audible activities resulting from the confluence of those activities. Furthermore, the
11 relocated BLM Access driveway directly revealing the southern end of Cement Plant Road as a
12 way to Davenport maximizes the invitation to disturb quiet residential areas such as New Town
13 and put children and adults walking along Cement Plant Road at risk.

16 4. On March 28, 2022 I attended a meeting in the field conducted by BLM Field
17 Manager Ben Blom at the site of BLM's proposed Warrenella Gate Parking Lot for Cotoni-Coast
18 Dairies. The other attendees were Brian McElroy, John Barnes, Noel Bock, Mike Eaton, and
19 Don Croll.

21 5. At that meeting I personally heard Field Manager Blom make the following
22 statements:

24 A. Blom confirmed that funding for the "cheese barn" renovation has been approved and
25 that planning for renovation has been initiated;

26 B. Blom stated that the expected use of the restored barn is for interpretive displays,
27 educational purposes, and special events;
28

- 1 C. Blom stated that the renovated barn would require a parking lot closer than the
2 planned lot at the top of the knoll and that the likely site for this parking would be the
3 area that the Appellant Davenport North Coast Association has long advanced as a
4 preferred site for parking for trail access;
5
6 D. Blom stated that BLM plans to proceed with construction on the parking lot in June
7 which could be prior to IBLA action on the appeal and noted that Appellants had not
8 asked for a stay pending decision on the appeal.
9
10 E. Blom identified four large trees that will be removed for access to the planned new
11 parking lot on the knoll proposed by BLM;
12
13 F. Blom acknowledged that substantial grading would be required to create the parking
14 lot planned by BLM;
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16 G. Blom acknowledged that the BLM-preferred Parking Lot and its Access would have a
17 visual impact on residents of New Town Davenport and be visible from much of the
18 Monument land;
19
20 H. Blom described BLM's intention to provide a visual screen between Warrenella Road
21 and the parking lot;
22
23 I. In response to a question, Blom acknowledged that the very close proximity of the
24 Access to the Parking Lot and the Warrenella gate would make it more difficult to
25 control bicycle access to Warrenella, a private road, and to closed areas of the
26 Monument via Warrenella.
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1 I declare under penalty of perjury that the foregoing is true and correct. Executed on May
2 10, 2022.

3 Colin Hannon

4  , Declarant
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PROOF OF SERVICE

I, Toyer Gear, declare as follows:

I am a resident of the State of California, and employed in Oakland, California. I am over the age of 18 years and am not a party to the above-entitled action. My business address is 1939 Harrison Street, Suite 150 Oakland, CA 94612. On May 11, 2022, I served a copy of the following documents:

- Declaration of Colin Hannon in Support of Motion to Stay


☒ By electronically e-mailing a true and correct copy to the e-mail addresses set forth below.

United States Department of the Interior Office of Hearings and Appeals Interior Board of Land Appeals 801 N. Quincy St., Suite 300 Arlington, VA 22203 ibla@oha.doi.gov	Erica Anderson, Attorney-Advisor Office of the Regional Solicitor Pacific Southwest Region U.S. Department of the Interior 2800 Cottage Way, Room E-1712 Sacramento, CA 95825-1890 erica.anderson@sol.doi.gov
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☒ By enclosing the documents in an envelope provided by an overnight delivery carrier and addressed to the persons listed below and placing the envelope for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier

BLM California State Director 2800 Cottage Way, W1623 Sacramento, CA 95825	Office of the Regional Solicitor Pacific Southwest Region U.S. Department of the Interior 2800 Cottage Way, Room E-1712 Sacramento, CA 95825-1890
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I declare under penalty of perjury (under the laws of the State of California) that the foregoing is true and correct, and that this declaration was executed May 11, 2022 at Oakland, California.



Toyer Gear