

**APPENDIX I**  
**RESPONSES TO COMMENTS ON DRAFT SEIS**

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 RESPONSES TO COMMENTS  
 ON THE  
 DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT**

**Table I-1: Responses to Comments on NEPA Process**

**Subsection 1.1 Public Participation**

<b>Comment 1.1-1: Request extension of Draft Supplemental Environmental Impact Statement (DSEIS) comment period</b>	
<i>Summary of Comments:</i> These comments request that the DSEIS comment period be extended. The comments provide a variety of reasons, including stating that none of the alternatives are acceptable since they do not fulfill the Court’s mandate to minimize adverse impacts and conflicts, that the size and complexity of the document require additional review time, and that additional review time will allow commenters to bring forth additional information to help inform BLM’s decision.	
<i>Response to Comments:</i> The BLM has determined that the comment period was sufficient.	
<i>Index to Comments</i>	
Pacific Crest Trail Association	135-1
Randy Banis	138-1, 138-2, 138-5
Lisbet Thoresen, Kim Erb, Jim Parrish, and Andrew Hoekstra	165-1, 165-8, 165-13
Defenders of Wildlife and Sierra Club	176-13
California Native Plant Society	179-22
Julia Dole	212-4
Donald Teschner	214-4
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-19, 377-145, 377-149
Center for Biological Diversity	379-2, 379-95
Kerncrest Audubon Society	400-1
Carla Cicchi	405-7
<b>Comment 1.1-2: Failure to follow requirements for public hearings, notices, and availability of materials for public review and comment</b>	
<i>Summary of Comments:</i> These comments generally state that BLM did not follow requirements for public hearings, notices, and opportunities for public review and comment. Some comments simply make a general statement, without identifying specific deficiencies. Others identify specific items, such as stating that BLM failed to provide access to hard-copies of the DSEIS and maps, that BLM failed to answer questions at the public meetings, or that BLM failed to provide the names of the preparers of the DSEIS.	

**Table I-1: Responses to Comments on NEPA Process**

<b><i>Response to Comments:</i></b>	
<p>The agency followed all requirements of the BLM NEPA Handbook (H-1790-1) and Land Use Planning Handbook (H-1601-1) with respect to providing opportunities for public input into the WMRNP. The efforts associated with pre-planning and scoping are described in Section 5.4 of the DSEIS. The scoping process included publication of two Notices of Intent, two overview scoping meetings, eight public travel designation workshops, and three public workshops focused on tribal communities. Throughout this process, the agency encouraged members of the public to sign up for receipt of additional notices and copies of the DSEIS. Upon publication, the DSEIS, on DVD, was distributed to approximately 200 people and agencies on the mailing list, and another 600 people who requested copies directly from BLM staff or during public meetings. In addition to being published in the Federal Register, on the project website, and in local publications, notice of the availability of the DSEIS and public meetings was mailed to more than 1,200 persons who had requested notification. The agency then held four public review meetings at locations throughout the planning area. The public review period was re-opened in September 2015 and 2 additional open houses were held in December. In addition, the Draft SEIS has been developed, and was distributed for another round of public review.</p>	
<b><i>Index to Comments</i></b>	
Gary Goodson	49-5, 49-15
Pam Nelson	62-4
Lisbet Thoresen, Kim Erb, Jim Parrish, and Andrew Hoekstra	165-14
Julia Dole	212-6
Donald Teschner	214-6
Linda Mawbey, Senior Planner, San Bernardino County	219-1
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-9, 377-45, 377-46, 377-107, 377-148
Center for Biological Diversity	379-94
Desert Tortoise Council	380-61, 380-64
<b>Comment 1.1-3: Difficulty accessing or using the DSEIS, or the maps, on BLM website</b>	
<b><i>Summary of Comments:</i></b>	
<p>These comments generally describe difficulties with accessing the DSEIS on BLM's website, or with using the maps provided with the DSEIS, either on the BLM website or on the DVDs. Other comments request map features, such as the ability to segregate routes kept open for a specific purpose such as rock-hounding, to be made available. The comments request extension of the public comment period to allow further review of the maps. The comments do not identify specific text in the DSEIS that is deficient.</p>	

**Table I-1: Responses to Comments on NEPA Process**

<b><i>Response to Comments:</i></b>	
<p>It is acknowledged that the volume of data provided on the maps is enormous, due to the very large size of the planning area and large number of routes. Due to this large size, there was no feasible method for making the material publicly available in a small, easily downloadable file sizes. Knowing the large size of the files, the agency made the information available in three different forms – through the interactive PDF maps on the project website and on DVD, and through the online GIS mapping tool. The agency immediately responded when reviewers expressed that they had difficulty accessing the files, by offering technical support and supplying DVDs upon request.</p> <p>In trying to make it possible for the public to review many different routes with respect to many different resources, the agency considered several different methods for portraying the information on maps. The use of interactive maps, where a reviewer can focus in on their area of interest and individually review each of the affected resources, is a common tool for graphically presenting these types of data for review. In doing so, the agency understood that all users may not be familiar with the technology. To address this, information describing how to use the system was included in a file on the DVD, called “Tips and Tricks for the Interactive Route Maps”. The agency also responded to dozens of requests from users who requested assistance, and provided staff at public meetings to demonstrate the use of the maps. The agency received numerous comments, both in public comments on the DSEIS and in person at the meetings, praising the usefulness of the maps.</p>	
<b><i>Index to Comments</i></b>	
Laurie Kaye and Curt Fisher	39-7
Miriam Seger	56-1
Pacific Crest Trail Association	135-2
Ruth Hidalgo	140-4
Lisbet Thoresen, Kim Erb, Jim Parrish, and Andrew Hoekstra	165-6, 165-7, 165-8, 165-9, 165-10, 165-11
Chris Carraher, Eric Hamburg, Beth Sheffield, Ken Sitz, Teresa Sitz	178-11
Mary Grimsley	185-1
Teresa Sitz	203-6, 203-7, 203-9
Julia Dole	212-5
Donald Teschner	214-5
Karl Zeller	226-2
Paul Pearson & Blanca Martinez	372-1
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-1, 377-7, 377-16, 377-17, 377-18, 377-146, 377-147
Kathy Goss	391-1, 391-2
Mary Dellavalle	409-1
Western Watersheds Project	411-4
<b>Comment 1.1-4: Failure to include maps in DSEIS file or to provide all background files for maps</b>	

**Table I-1: Responses to Comments on NEPA Process**

<b>Summary of Comments:</b> These comments request that the GIS layers and inventory data be made available to the public, or state that the inclusion of the maps in a file separate from the DSEIS leaves the DSEIS incomplete.	
<b>Response to Comments:</b> Information from the GIS layers is available (shown) on the maps provided in the DEIS. The GIS data used for the DSEIS will be posted when the ROD is signed.	
<b>Index to Comments</b>	
Joseph Webber	13-1
Laurie Kaye and Curt Fisher	39-7
Ruth Hidalgo	140-4
Teresa Sitz	203-6, 203-9
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-110
California 4 Wheel Drive Association	406-5, 406-15
<b>Comment 1.1-5: Support for/appreciation of map features</b>	
<b>Summary of Comments:</b> These comments generally provide positive comments on, and appreciation for, the functionality or content of the maps.	
<b>Response to Comments:</b> The comments in favor of the use of interactive maps to present the routes and the potentially affected resources are noted. No changes to the Draft SEIS have been requested, and none have been made.	
<b>Index to Comments</b>	
Randy Banis	138-57
Ruth Hidalgo	140-3
Lisbet Thoresen, Kim Erb, Jim Parrish, and Andrew Hoekstra	165-12
Laraine Turk	234-1
<b>Comment 1.1-6: Readability of the DSEIS</b>	
<b>Summary of Comments:</b> These comments state that the DSEIS is not written in a plain, easily understandable manner, as is required by NEPA. Some comments provide analysis of the text of the DSEIS to measure its readability. The analysis demonstrates that the text of the DSEIS is confusing, and largely too complicated to meet the 40 CFR 1502 requirements for writing of a DSEIS in plain and concise language. The comments provide examples of how comparative information could be re-organized to improve the readability of the document.	
<b>Response to Comments:</b> The FSEIS was reviewed to reduce the complexity of the NEPA document.	
<b>Index to Comments</b>	
Desert Tortoise Council	412-3
<b>Comment 1.1-7: General support for the approach of the WMRNP and route evaluation process</b>	
<b>Summary of Comments:</b> These comments generally state that the WMRNP is an improvement on previous WEMO travel management efforts, and is likely to provide for improved preservation of resources. The comments encourage continued use of the process through the Travel Management Plans.	
<b>Response to Comments:</b> The comments in favor of the approach of the DSEIS and the route evaluation process are noted. No changes to the Draft SEIS have been requested, and none have been made.	

**Table I-1: Responses to Comments on NEPA Process**

<b><i>Index to Comments</i></b>	
David M. Jensen	23-1
Gatzke Dillon and Ballance, LLP	115-1
Ruth Hidalgo	140-5
Sarah Kennington and Steve Bardwell (co-signed by 32 Morongo Basin residents)	151-24
California Off-Road Vehicle Association	399-2
Blue Ribbon Coalition	410-3, 410-4
<b>Comment 1.1-8: General objection to the approach of the DSEIS</b>	
<b><i>Summary of Comments:</i></b> These comments generally oppose the approach used, or the range of alternatives evaluated. They recommend that none of the alternatives be adopted, and that the WMRNP be re-started, or another DSEIS issued for public comment before the Final Supplemental EIS is issued. The comments are made both by commenters who advocate reducing routes and protecting more resources, and commenters who would prefer to open more routes.	
<b><i>Response to Comments:</i></b> BLM followed all requirements of the BLM NEPA Handbook (H-1790-1) in acquiring public input into the scope of analyses and range of alternatives that were employed in the DSEIS.	
<b><i>Index to Comments</i></b>	
Comment letter # 64 is a form letter received from approximately 3,520 commenters	64-1, 64-5
Comment letter #65 is a form letter received from approximately 2,416 commenters	65-7, 65-8
Stephanie Weigel	210-1
Shirley Vaughn	332-1
Chris Lish	333-1, 333-5
F Hammer	335-1, 335-5
Roman LoBianco	336-1, 336-5
Kathleen McConn	339-1, 339-5
Katie Fagan	341-1, 341-5
Stewart Wilber	342-1, 342-5
Mlou Christ	345-1, 345-2
Janet Fiore	346-1, 346-4
Ted & Karen Meyers	371-1
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-3, 377-8, 377-43, 377-44, 377-51, 377-105
Center for Biological Diversity	379-18, 379-95
Desert Tortoise Council	380-1, 380-2, 380-3, 380-14, 380-26, 380-82, 380-98, 380-115, 380-186
Colorado River Indian Tribes	384-2
Carla Cicchi	405-1, 405-6
Western Watersheds Project	411-5
Desert Tortoise Council	412-8, 412-9, 412-12, 412-15, 412-57

**Table I-1: Responses to Comments on NEPA Process**

<b>Comment 1.1-9: Request for Clarification of TTM discussion</b>	
<b>Summary of Comments:</b> These comments request that BLM clarify text regarding BLM’s adoption of the TTM system.	
<b>Response to Comments:</b> Text derived from Manual 1626 to describe BLM’s adoption of the TTM system, has been provided in Appendix G.	
<b>Index to Comments</b>	
Desert Tortoise Council	412-37
<b>Comment 1.1-10: Adequacy of Response to Comments</b>	
<b>Summary of Comments:</b> These comments generally contend that comments submitted during the scoping comment period and/or the 2015/2016 DEIS public comment period were not addressed in the Draft SEIS. Some of the comments state that “comment noted” is not a sufficient response, while others point out specific comments submitted that the commenter states were not addressed.	
<b>Response to Comments:</b> The comments that received the response “comment noted” in 2015/2016 review were generally non-substantive comments. Comments that are not considered substantive include the following: comments in favor of or against the proposed action or alternatives without reasoning that meet the criteria listed above (such as “we disagree with Alternative Two and believe the BLM should select Alternative Three”). <ul style="list-style-type: none"> <li>• comments that only agree or disagree with BLM policy or resource decisions without justification or supporting data that meet the criteria listed above (such as “more grazing should be permitted”).</li> <li>• comments that don’t pertain to the project area or the project (such as “the government should eliminate all dams,” when the project is about a grazing permit).</li> <li>• comments that take the form of vague, open-ended questions.</li> </ul> Comments that were considered to be non-substantive were not addressed further.	
<b>Index to Comments</b>	
Defenders of Wildlife and Sierra Club	176-95
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-11, 377-111
Center for Biological Diversity	379-65, 379-67, 379-70
ORV Watch Kern County	392-1
Desert Tortoise Council	412-17, 412-18, 412-55

**Subsection 1.2 Consultation**

<b>Comment 1.2-1: Requests that BLM consult with affected agencies, organizations, and communities</b>	
<b>Summary of Comments:</b> These comments generally request that BLM consult with other law enforcement agencies, agencies that manage adjacent jurisdictions, outside organizations, or communities regarding the impact of the WMRNP on their enforcement capability, route network, stakeholders, or residents. Some of the comments state that BLM has not consulted, while others simply request future consultation. Some of the comments provide names of specific agencies or organizations that should be invited to consult, while other comments do not identify specific agencies or organizations.	
<b>Response to Comments:</b> Most of the agencies or organizations mentioned in these comments have already been included in consultations regarding the WMRNP up to this point of the project. In response to the comments, the agency has reviewed the requests to ensure that all of the requested parties are included on the mailings lists, for future communications.	
<b>Index to Comments</b>	
Gary Goodson	49-12, 49-13
Capital Trail Vehicle Association	54-14
Defenders of Wildlife and Sierra Club	176-54
Chris Carraher, Eric Hamburg, Beth Sheffield, Ken Sitz, Teresa Sitz	178-13
U.S. Marine Corps Installations West	183-2
Irene Fisher	206-5
Margaret Adam	221-5
Desert Tortoise Council	380-55
Colorado River Indian Tribes	384-12, 384-13
San Bernardino County	407-1, 407-3, 407-4
Desert Tortoise Council	412-155

**Subsection 1.3 Future Use of Supplemental EIS**

<b>Comment 1.3-1: Request that the WMRNP process be used to establish a mechanism for designation of future routes</b>	
<b>Summary of Comments:</b> These comments request that BLM use the WMRNP process to establish a mechanism that can be used to designate routes in the future without the need for CDCA Plan Amendment.	
<b>Response to Comments:</b> Chapter 2 of the DSEIS discusses how the proposed Plan Amendments are intended to assist BLM in identifying future changes to the route network that would require an additional Plan Amendment, and which could be made without a new Plan Amendment.	
<b>Index to Comments</b>	
Inyo County Board of Supervisors	130-2
Town of Apple Valley	382-5

**Subsection 1.4 NEPA Sufficiency**

<b>Comment 1.4-1: The WMRNP should be coordinated with DRECP</b>	
<i>Summary of Comments:</i> These comments state that the WMRNP is not consistent with the DRECP's management of areas for their conservation values.	
<i>Response to Comments:</i> The FSEIS was revised to ensure consistency and policy conformance with the DRECP LUPA.	
<i>Index to Comments</i>	
California Native Plant Society	179-6
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-5, 377-81, 377-82, 377-83, 377-120
Center for Biological Diversity	379-75
Western Watersheds Project	411-11

**Table I-2: Responses to Comments on Proposed CDCA Plan Amendments**

**Subsection 2.1 Comments in Favor of Proposed Plan Amendments**

<b>Comment 2.1-1: Comments in favor of part or all of PA III – Update parameters for C Routes</b>	
<i>Summary of Comments:</i> These comments express support for adopting parts or all of PA III, which would update the parameters for Competitive (C) Routes.	
<i>Response to Comments:</i> Comments in favor of the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS.	
<i>Index to Comments</i>	
Blue Ribbon Coalition	410-5
<b>Comment 2.1-2: Comments in favor of part or all of PA VI – Changing WEMO Plan limits on stopping and parking adjacent to designated routes</b>	
<i>Summary of Comments:</i> These comments express support for adopting parts or all of PA IV – Changing WEMO Plan limits on stopping and parking adjacent to designated routes.	
<i>Response to Comments:</i> Comments in favor of the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS.	
<i>Index to Comments</i>	
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-30
<b>Comment 2.1-3: Comments in favor of PA VII – Reallocate AUMs and modify allotment boundaries</b>	
<i>Summary of Comments:</i> These comments favor the adoption of PA VII – Reallocate AUMs and modify allotment boundaries, in order to protect resources.	
<i>Response to Comments:</i> Comments in favor of the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS.	
<i>Index to Comments</i>	
Christina Amarillas	222-1
Diane Hesford	244-1
Center for Biological Diversity	379-31
Western Watersheds Project	411-12

**Subsection 2.2 Comments Opposed to Proposed Plan Amendments**

<b>Comment 2.2-1: Comments opposed to the adoption of PA I – Change the CDCA Plan language that limits the WEMO route network to existing routes of travel as of 1980</b>	
<i>Summary of Comments:</i> These comments object to the adoption of proposed PA I – Change the CDCA Plan language that limits the WEMO route network to existing routes of travel as of 1980.	
<i>Response to Comments:</i> Comments opposed to the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Final Supplemental EIS.	
<i>Index to Comments</i>	
Center for Biological Diversity	379-20
<b>Comment 2.2-2: Comments opposed to all or part of PA III – Update parameters for C Routes</b>	

<b>Summary of Comments:</b> These comments oppose adoption of some components of, or alternatives for, PA III, which would update the parameters for Competitive (C) Routes.	
<b>Response to Comments:</b> Comments opposed to the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS.	
<b>Index to Comments</b>	
Desert Tortoise Preserve Committee	117-16
Irene Fisher	206-6
Desert Tortoise Council	380-169, 380-181, 380-199
<b>Comment 2.2-3: Comments opposed to all or part of PA IV – Modify general access designations related to washes, sand dunes, and dry lakes</b>	
<b>Summary of Comments:</b> These comments oppose adoption of some components of, or alternatives for, PA IV, which would modify general access designations related to washes, sand dunes, and dry lakes.	
<b>Response to Comments:</b> Comments opposed to the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS.	
<b>Index to Comments</b>	
Desert Tortoise Preserve Committee	117-12
Center for Biological Diversity	379-89
Desert Tortoise Council	380-80, 380-171 , 380-189
Western Watersheds Project	411-8
Desert Tortoise Council	412-43, 412-44, 412-55
<b>Comment 2.2-4: Comments opposed to PA V – Changing WEMO Plan limitations on access into Rand Mountains - Fremont Valley Management Area</b>	
<b>Summary of Comments:</b> These comments oppose adoption of PA V, which would change the WEMO Plan limitations on access to the Rand Mountains - Fremont Valley Management Area.	
<b>Response to Comments:</b> Comments opposed to the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS.	
<b>Index to Comments</b>	
Desert Tortoise Council	412-46
<b>Comment 2.2-5: Comments opposed to PA VI – Changing WEMO Plan limits on stopping and parking adjacent to designated routes</b>	
<b>Summary of Comments:</b> These comments oppose adoption of PA VI, which would change the WEMO Plan limitations on stopping and parking adjacent to designated routes. Some of these comments state a preference for wider limits, or no limits, in order to increase access. Other comments state a preference for narrower limits, in order to protect resources.	
<b>Response to Comments:</b> Comments opposed to the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS.	
<b>Index to Comments</b>	
Ruth Hidalgo	140-1

	Colorado River Indian Tribes	384-8
	California 4 Wheel Drive Association	406-10
	Desert Tortoise Council	412-47
<b>Comment 2.2-6: Comments opposed to PA VII – Reallocate AUMs and modify allotment boundaries</b>		
<b>Summary of Comments:</b> These comments oppose the adoption of PA VII – Reallocate AUMs and modify allotment boundaries. These comments oppose the inclusion of changes to grazing allotments in the alternatives evaluated in the DSEIS. The comments also state that the DSEIS does not analyze the impacts that would occur as a result of the termination of grazing.		
<b>Response to Comments:</b> Comments opposed to the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS.		
<b>Index to Comments</b>		
	Irene Fisher	206-9, 206-10, 206-11
	Jay and Karen Moon, Ron and Jonna Kemper, Billy & Julie Mitchell, Jon Stone (Allotment Lessees)	393-1, 393-2, 393-3, 393-4
	Western Watersheds Project	411-7
	Desert Tortoise Council	412-66

### Subsection 2.3 Comments Regarding Development and Analysis of the Proposed Plan Amendments

<b>Comment 2.3-1: Compliance of Plan Amendments with FLPMA and the CDCA Plan</b>		
<b>Summary of Comments:</b> These comments request that the DSEIS provide more information on the manner in which the proposed Plan Amendments are consistent with FLPMA, the CDCA Plan, and the TTM Guidance. These comments reference specific text from FLPMA and the CDCA Plan which describes the issues that the BLM must consider in LMP revisions. The commenters have highlighted specific passages in the text that they contend was not adequately considered in the DSEIS. The comments contend that the DSEIS addresses only limited elements of the CDCA Plan, and must address all elements.		
<b>Response to Comments:</b> Sections 2.1.2 and 2.2.1 of the DSEIS specifically reference sections of FLPMA, the CDCA Plan, BLM’s Travel and Transportation Management Handbook, and other BLM regulations and guidance that must be addressed under the WMRNP. The DSEIS addresses all CDCA Plan elements that would be affected by the proposed Plan Amendments. In addition, the DSEIS addresses all of the resources that are the subject of the CDCA Plan elements.		
<b>Index to Comments</b>		
	Randy Banis	138-13
	Center for Biological Diversity	379-1, 379-3, 379-4
	Desert Tortoise Council	380-50, 380-51, 380-52, 380-53, 380-54, 380-69, 380-86, 380-103
<b>Comment 2.3-2: Comments on the sufficiency of analysis of the proposed Plan Amendments</b>		

<b>Summary of Comments:</b>	
These comments state that the analysis of the proposed Plan Amendments is insufficient. Some comments state that the analysis does not apply or address the minimization criteria. Other comments request an analysis of the impact of the proposed Plan Amendments by evaluating the condition and trend of ACECs and NLCS lands.	
<b>Response to Comments:</b>	
The resources analyzed within Chapters 3 and 4 include all of the resources from the minimization criteria of 43 CFR 8342.1. The analysis of each of those resources, including ACECs and NLCS lands, specifically addresses the impact of each of the proposed Plan Amendments.	
<b>Index to Comments</b>	
Desert Tortoise Preserve Committee	117-16
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-42, 377-56, 377-86, 377-87, 377-91, 377-92
Center for Biological Diversity	379-30, 379-87
Desert Tortoise Council	380-97, 380-149, 380-150, 380-158, 380-159, 380-160, 380-170, 380-194
<b>Comment 2.3-3: Comments on the sufficiency of analysis of PA I – Change the CDCA Plan language that limits the WEMO route network to existing routes of travel as of 1980</b>	
<b>Summary of Comments:</b>	
These comments state that the DSEIS does not sufficiently analyze the environmental impacts of, or analyze alternatives to, proposed PA I – Change the CDCA Plan language that limits the WEMO route network to existing routes of travel as of 1980. The comments state that the DSEIS does not assess the impacts of the proposed change, does not provide a rationale for the proposed change, should have analyzed alternatives to the PA, and that the change was not directed by the Court.	
<b>Response to Comments:</b>	
The rationale for PA I, including the reasons why only two alternatives (No Action Alternative and the Proposed Action) to PA I are feasible, is provided in Section 2.1.2. The impacts of PA I, including the No Action Alternative and the Proposed Action, are specifically discussed under each resource in Chapter 4. The DSEIS did not claim that the Court ordered that PA I be considered. Section 1.2 of the DSEIS discusses the reasons for inclusion of PA 1 in the WMRNP, which are based on conformance with BLM regulations and guidance.	
<b>Index to Comments</b>	
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-27, 377-28
Center for Biological Diversity	379-6, 379-17, 379-19
<b>Comment 2.3-4: Comments on the sufficiency of analysis of PA II – Adopt Travel Management Areas</b>	
<b>Summary of Comments:</b>	
These comments state that the DSEIS does not sufficiently analyze the environmental impacts of, or analyze a full range of alternatives to, proposed PA II – Adopt Travel Management Areas. The comments state that the DSEIS does not consider a sufficient range of alternatives.	
<b>Response to Comments:</b>	
BLM used the scoping process to obtain public input into the development of TMA alternatives to be considered under PA II. The impacts of PA II, including the No Action Alternative and two alternative PAs, were specifically discussed under each resource in Chapter 4.	

<b><i>Index to Comments</i></b>	
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-31, 377-32, 377-33, 377-34, 377-35, 377-36
<b>Comment 2.3-5: Comments on the sufficiency of analysis of PA III – Update parameters for C Routes</b>	
<b><i>Summary of Comments:</i></b> These comments state that the DSEIS does not sufficiently analyze the environmental impacts of PA III, which would update the parameters for Competitive (C) Routes. The comments state that the DSEIS does not consider a sufficient range of alternatives, does not identify the specific routes, and has not identified all resources along the proposed routes.	
<b><i>Response to Comments:</i></b> BLM used the scoping process to obtain public input into the development of alternative parameters for C Routes to be considered under PA III. The impacts of PA III, including the No Action Alternative and three action alternatives, were specifically discussed under each resource in Chapter 4.	
<b><i>Index to Comments</i></b>	
Center for Biological Diversity	379-21, 379-22, 379-23, 379-24
Desert Tortoise Council	380-22, 380-56, 380-57, 380-58, 380-168
Desert Tortoise Council	412-41, 412-42, 412-64, 412-65, 412-69
<b>Comment 2.3-6: Comments on the sufficiency of analysis of PA IV – Modify general access designations related to washes, sand dunes, and dry lakes</b>	
<b><i>Summary of Comments:</i></b> These comments state that the DSEIS does not sufficiently analyze the environmental impacts of PA IV, which would modify general access designations related to washes, sand dunes, and dry lakes. The comments state that the DSEIS does not consider a sufficient range of alternatives, does not address impacts on Cuddeback Lake, and has not identified all resources associated with the dry lakes.	
<b><i>Response to Comments:</i></b> BLM used the scoping process to obtain public input into the development of alternative parameters for the dry lakes to be considered under PA IV. The impacts of PA IV, including the No Action Alternative and three action alternatives, were specifically discussed under each resource in Chapter 4. Impacts to Cuddeback Lake were discussed under all resources in Chapter 4. Opening only the lake bed itself will provide for both motorized (OHV Open, OHV Limited or OHV Closed), non-motorized and non-mechanized recreation uses including camping, land sailing, filming, stargazing, photography, and OHV use, but will be monitored to ensure that cross-country use does not spill over into the limited use critical tortoise habitat by use of signs, outreach, and other implementation strategies. If signs are not enough, measures such as barriers, may be implemented.	
<b><i>Index to Comments</i></b>	
Desert Tortoise Preserve Committee	117-12
Center for Biological Diversity	379-25, 379-91
Desert Tortoise Council	380-78, 380-79, 380-189

	Colorado River Indian Tribes	384-5
	Desert Tortoise Council	412-63, 412-84
<b>Comment 2.3-7: Comments on the sufficiency of analysis of PA V – Changing WEMO Plan limitations on access into Rand Mountains - Fremont Valley Management Area</b>		
	<b>Summary of Comments:</b> These comments state that the DSEIS does not sufficiently analyze the environmental impacts of PA V – Changing WEMO Plan limitations on access into Rand Mountains - Fremont Valley Management Area. The comments state that the DSEIS does not provide any documentation from operation of the permit system for the past 9 years.	
	<b>Response to Comments:</b> BLM used the scoping process to obtain public input into the Rand Permit system. The impacts of PA V, including the No Action Alternative and three action alternatives, were specifically discussed under each resource in Chapter 4. The change from a required permit system to an intensively managed limited designated route network would free up staff members that would have to be solely dedicated to the administration of a permit program. These staff members would be able to carry out and oversee efforts as outlined in the areas TMP such as route signing, public education outreach, trail maintenance, and restoration. These efforts would result in a more broad based approach to the effective management of public lands. Additionally, the requirement of a person to pay a fee for the use of the federal recreational lands within the Rand Mountains-Fremont Valley Management Area is a violation of the Federal Lands Recreation Enhancement Act (FLREA) (PL 108-447). FLREA prohibits the charging of standard or expanded amenity fees for dispersed areas, for persons who are driving through Federal recreation lands, or for parking or picnicking along roads and trails. (Sec. 803 (d) (1)).	
	<b>Index to Comments</b>	
	Center for Biological Diversity	379-27, 379-28, 379-29
	Desert Tortoise Council	380-183
	Desert Tortoise Council	412-45, 412-97
<b>Comment 2.3-8: Comments on the sufficiency of analysis of PA VII – Reallocate AUMs and modify allotment boundaries</b>		
	<b>Summary of Comments:</b> These comments state that the DSEIS does not sufficiently analyze the environmental impacts, or analyze a sufficient range of alternatives to, PA VII – Reallocate AUMs and modify allotment boundaries. The comments also contend that the scope of the alternatives do not conform to the recommendations of DRECP.	
	<b>Response to Comments:</b> BLM used the scoping process to obtain public input into the development of grazing allotment alternatives under PA VII. The impacts of PA VII, including the No Action Alternative and three action alternatives, were specifically discussed under each resource in Chapter 4.	
	<b>Index to Comments</b>	
	Desert Tortoise Preserve Committee	117-15
	Center for Biological Diversity	379-32
<b>Comment 2.3-9: Failure to analyze alternatives to all of the proposed Plan Amendments</b>		
	<b>Summary of Comments:</b> These comments state that the DSEIS must analyze alternatives to all of the proposed Plan Amendments, and point out that there are no alternatives to PA-I, PA-II, and PA-IV.	

	<p><b><i>Response to Comments:</i></b>          Section 2.1.2 of the DSEIS specifically describes why alternatives are not considered for some of the proposed Plan Amendments. The rationale, in each case, is that the existing language of the CDCA Plan no longer applies because it has been overridden by other legislation, regulation, or guidance. In effect, these items have already been changed by that legislation, regulation, or guidance, and thus the proposed amendments are simply incorporating those changes.</p>
	<p><b><i>Index to Comments</i></b></p>
	<p>Center for Biological Diversity</p>
	<p>397-7</p>

**Table I-3: Responses to Comments on Proposed Changes to Grazing Allotments**

**Subsection 3.1 Comments Opposed to Grazing**

<b>Comment 3.1-1: Requests to reduce/eliminate grazing in specific areas</b>	
<b>Summary of Comments:</b> These comments request that grazing be reduced or eliminated in specific areas.	
<b>Response to Comments:</b> Livestock grazing is an authorized use under the CDCA Plan, as amended by the 2006 West Mojave Plan and the 2016 DRECP. The California Desert District Office, Barstow and Ridgecrest Field Offices have consulted with the US Fish and Wildlife Service (FWS), including formal consultations on the 2006 WEMO Plan Amendment and the 2016 DRECP Plan Amendment regarding the continued existence of the desert tortoise and modification of critical habitat. The FWS made a determination that livestock grazing in the WEMO Planning Area would not jeopardize the continued existence of the desert tortoise or result in adverse modification of critical habitat. All of the current grazing leases include the grazing strategies contained in the 2006 WEMO as terms and conditions to those grazing leases under FWS concurrence. Recent grazing lease renewals were issued under the authority of Section 402(c)(2) of FLPMA as amended.	
<b>Index to Comments</b>	
Desert Tortoise Preserve Committee	117-15
Defenders of Wildlife and Sierra Club	176-71, 176-74
U.S. Marine Corps Installations West	183-4
Jessica Carr	278-1
Center for Biological Diversity	379-33
John Nichols	290-1
Desert Tortoise Council (all tortoise habitats)	380-17
Desert Tortoise Council (Wilderness areas, El Paso Mountains, and non-wilderness areas in Indian Wells Valley)	380-48
Kerncrest Audubon Society (Jawbone/Butterbredt ACEC)	400-5
<b>Comment 3.1-2: General comments opposed to grazing</b>	
<b>Summary of Comments:</b> These comments generally oppose grazing because of resource use and impacts to vegetation and wildlife.	
<b>Response to Comments:</b> Livestock grazing is an authorized use under the CDCA Plan as amended by the 2006 West Mojave Plan and the 2016 DRECP. The California Desert District Office, Barstow and Ridgecrest Field Offices have consulted with the FWS on several occasions, including formal consultations on the 2006 WEMO Plan Amendment and the 2016 DRECP Plan Amendment on the continued existence of the desert tortoise and modification of critical habitat. The FWS made a determination that livestock grazing in the WEMO Planning Area would not jeopardize the continued existence of the desert tortoise or result in adverse modification of critical habitat. All of the current grazing leases include the grazing strategies contained in the 2006 WEMO as terms and conditions to those grazing leases under FWS concurrence. Recent grazing lease renewals were issued under the authority of Section 402(c)(2) of FLPMA as amended.	
<b>Index to Comments</b>	
Andrea Salinas	236-2

Ken Sanford	238-2
manorlee52 (only name given on e-mail)	239-1
David Holloway	240-1
Fred Rinne	241-1
Cathey Schneider	251-1
Noreen Lawlor	258-1
Diane Bolton	263-1
Charles Anderson	266-1
Charles Anderson	271-1
Catherine Kamas	276-1
Brain Carr	279-1
Helen Wagenvoord	284-1
Janice Jones	289-1
Annette Bork	293-1
Lisa Kellman	294-1
Jennifer Mosier	298-1
Karen McMurray	299-1
Nancy Oliver	300-1
Karil Hazard	306-1
Randall Boltz	308-1
Todd W. Barnes	309-1
Jan Summers	311-1
Dita Skalic	313-1
Western Watersheds Project	411-15, 411-17

**Subsection 3.2 Comments in Support of Grazing**

<b>Comment 3.2-1: General comments in support of grazing</b>	
<i>Summary of Comments:</i> These comments generally support grazing as an important component of multiple use.	
<i>Response to Comments:</i> Livestock grazing is an authorized use under the CDCA Plan as amended by the 2006 West Mojave Plan and the 2016 DRECP. All of the current grazing leases include the grazing strategies contained in the 2006 WEMO as terms and conditions to those grazing leases under FWS concurrence. Recent grazing lease renewals were issued under the authority of Section 402(c)(2) of FLPMA as amended.	
<i>Index to Comments</i>	
Irene Fisher	206-1
Julie Mitchell	237-1

**Subsection 3.3 Comments Regarding the Sufficiency of the Analysis of Grazing**

<b>Comment 3.3-1: Specific comments on the sufficiency of the analysis of grazing in the DSEIS</b>	
<b>Summary of Comments:</b> These comments request specific changes to information provided about grazing allotments, or recommend changes in the analysis of the impacts of grazing.	
<b>Response to Comments:</b> The information contained in the DSEIS concerning livestock grazing and grazing allotments is the most current and accurate information available. Livestock grazing is an authorized use under the CDCA Plan as amended by the 2006 West Mojave Plan and the 2016 DRECP. All of the current grazing leases include the grazing strategies contained in the 2006 WEMO as terms and conditions to those grazing leases under FWS concurrence. Recent grazing lease renewals were issued under the authority of Section 402(c)(2) of FLPMA as amended.	
<b>Index to Comments</b>	
Defenders of Wildlife and Sierra Club	176-71, 176-74, 176-75, 176-76, 176-77, 176-78, 176-79, 176-80, 176-81, 176-82, 176-83, 176-84, 176-85, 176-86, 176-87, 176-88, 176-89, 176-90, 176-91, 176-92
U.S. Marine Corps Installations West	183-4
Desert Tortoise Council	380-18
Desert Tortoise Council	412-6, 412-36, 412-48

**Table I-4: Responses to Comments on the Proposed Route Network and Alternatives**

**Subsection 4.1 Comments on the Portrayal of Routes on Maps**

<b>Comment 4.1-1: Maps are confusing, not complete, not up-to-date, or contain errors in land ownership or route configurations</b>	
<b>Summary of Comments:</b> These comments point out information, such as property boundaries, land ownership, route locations, and geographic features, which are not correctly presented on the maps. These comments provide specific information, from on-the-ground observations and knowledge, of errors in the maps' depiction of individual routes and/or land ownership. Some of the comments point out missing designations or sub-designations on the maps. Other comments request that the geographic coverage of the analysis be expanded outside of the WEMO area to allow the public to review the connectivity of the network with adjacent NEMO and NECO areas. Several comments also note discrepancies in data and designations between the different maps associated with the WMRNP, and with other maps, such as those published as Desert Access Guides (DAGs). The comments generally do not provide an opinion regarding whether the route ought to be opened or closed, just that the depiction of the route on the map needs to be corrected.	
<b>Response to Comments:</b> The agency has reviewed the specific issues identified in these comments and corrected the maps as needed.	
<b>Index to Comments</b>	
James Wilson	11-1
Pat Flanagan	52-1
Friends of Juniper Flats	53-1
Pam Nelson	62-4
Comment letter #64 is a form letter received from approximately 3,520 commenters	64-2
Comment letter #65 is a form letter received from approximately 2,416 commenters	65-7
Pacific Crest Trail Association	135-3
Randy Banis	138-7, 138-12
Dianne Rindt	164-1
Defenders of Wildlife and Sierra Club	176-23
Chris Carraher, Eric Hamburg, Beth Sheffield, Ken Sitz, Teresa Sitz	178-11
U.S. Marine Corps Installations West	183-4
Teresa Sitz	203-7
Paul Pearson	204-3
Stephanie Weigel	210-2
Julia Dole	212-5, 212-11
Donald Teschner	214-5, 214-11
Chris Lish	333-2
F Hammer	335-2
Roman LoBianco	336-2
Kathleen McConn	339-2
Katie Fagan	341-2
Stewart Wilber	342-2

	377-1, 377-7, 377-12, 377-13, 377-16, 377-17, 377-18, 377-67, 377-75
Center for Biological Diversity	379-8, 379-44, 377-139, 377-140, 377-141, 377-142, 377-147
Desert Tortoise Council	380-64, 380-151, 380-163
Carla Cicchi	405-3
California 4 Wheel Drive Association	406-6, 406-7
Desert Tortoise Council	412-145
<b>Comment 4.1-2: Request for indication of street-legal routes on the maps</b>	
<b>Summary of Comments:</b> These comments request that “street legal” routes be identified on the maps in a separate color from “motorized/open” routes, so that reviewers can determine whether routes of interest are open or closed to OHVs.	
<b>Response to Comments:</b> The maps in the Draft SEIS have been revised in the Final SEIS to show routes with the subdesignation of “street legal”, to more clearly identify these routes.	
<b>Index to Comments</b>	
Gary Goodson	49-17, 49-18, 49-19
Sarah Kennington and Steve Bardwell (co-signed by 32 Morongo Basin residents)	151-10
Chris Carraher, Eric Hamburg, Beth Sheffield, Ken Sitz, Teresa Sitz	178-11
<b>Comment 4.1-3: Objection to manner in which routes are shown on maps</b>	
<b>Summary of Comments:</b> These comments object to how routes are shown on the maps. Some comments state that the route types indicated on the maps do not conform to the route inventory guidance that recognizes roads, primitive roads, and trails. Others state that the change in route numbering from previous route designation efforts in WEMO makes it difficult to compare the designations, or that the subdesignations cannot be determined from the maps. Others state that the color code used to show sub-designations masks routes that are designated for permit only.	
<b>Response to Comments:</b> Previous route numbers were used wherever viable, but the update and correction of the route inventory required substantial changes to the previous numbering system. The asset classification of routes as roads, primitive roads, and trails are not mapped in the Draft SEIS as this classification is primarily used for explaining the state of construction and maintenance on a route. However, information regarding the asset classification of each route can be found in the TMPs in Appendix G. The maps in the Draft SEIS have been updated to show route subdesignations separately.	
<b>Index to Comments</b>	
Gary Goodson	49-17, 49-18, 49-19
Randy Banis	138-8
Defenders of Wildlife and Sierra Club	176-23
Teresa Sitz	203-1

The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-12
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**Subsection 4.2 Comments on the Route Inventory, Baseline, and No Action Alternative Network**

<b>Comment 4.2-1: The process for inventorying routes and trails was flawed</b>	
<i>Summary of Comments:</i> These comments state that process of relying on aerial photograph analysis and generalized assumptions about on-the-ground conditions to develop the route inventory and estimate resource impacts is flawed because it did not include ground truthing, categorized natural features as existing routes, failed to identify non-motorized trails, and failed to consider route-specific impacts in the designation process. Some of the comments point out that, by failing to identify non-motorized trails and cattle trails, these features have been opened to motorcycle use, which is much more damaging to resources.	
<i>Response to Comments:</i> As discussed on Page 2-18, the GIS route inventory data was checked against field surveys in 2012 and therefore is not based entirely on aerial photographs. The inventory data included non-motorized routes and each action alternative includes non-motorized routes. In addition, BLM has encouraged the public to provide route-specific comments on the current status and use of routes and to identify any routes that may be missing from the inventory. More than 5,600 route specific comments were received in the public comment period. BLM individually reviewed these comments and made appropriate changes to route designations, subdesignations, etc. if needed. Additional changes to the route inventory and network will be made in the future as issues are identified by BLM staff, or are communicated to BLM by the public.	
<i>Index to Comments</i>	
Gary Goodson	49-16
Capital Trail Vehicle Association	54-11
Randy Banis	138-5
Defenders of Wildlife and Sierra Club	176-8, 176-24
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-47, 377-48
Center for Biological Diversity	379-40
<b>Comment 4.2-2: The basis of the No Action Alternative is unlawful</b>	
<i>Summary of Comments:</i> These comments state that the No Action Alternative is unlawful because it is based on the WEMO 2006 designation, which was found to be unlawful, and was specifically precluded in the Court Order. The comments also contend that use of the route inventory as the baseline for analysis, instead of use of the No Action Alternative as the baseline, is unlawful, unclear, and inaccurate.	
<i>Response to Comments:</i> The Court did not remand the No Action Alternative in place through the WMRNP process, but rather commented on the sufficiency of analysis of the alternative. The No Action Alternative represents the route designations that are currently in effect, and thus is an appropriate alternative that meets the requirements of NEPA.	
<i>Index to Comments</i>	
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-14, 377-15, 377-25, 377-47, 377-49, 377-50, 377-114
Center for Biological Diversity	379-42, 379-83

	Desert Tortoise Council	412-144
<b>Comment 4.2-3: Routes identified in baseline should not be referred to as transportation linear disturbances</b>		
	<i>Summary of Comments:</i> These comments state that routes shown on maps as part of the baseline are improperly identified as transportation linear disturbances, and should be considered open pending impact assessment under CFR 8342.1.	
	<i>Response to Comments:</i> The existence of a route on the ground as part of the inventory does not imply that the feature was an open route in the No Action Alternative. The development and analysis of route network Alternatives 2, 3, and 4 considered opening of routes that were designated as transportation linear disturbances in the baseline, if a need for that route to be OHV Open/OHV Limited access, use or recreation was identified.	
	<i>Index to Comments</i>	
	Gatzke Dillon and Ballance, LLP	115-2

**Subsection 4.3 Comments on the Route Designations and Route Network Alternatives**

<b>Comment 4.3-1: Range of Alternatives does not include an alternative with a reduced route network, or alternatives that would minimize impacts, as directed by the Court</b>		
	<i>Summary of Comments:</i> These comments state that the alternatives analyzed in the DSEIS do not represent a range, do not comply with the Court’s requirement to analyze an alternative with a reduced mileage of routes, do not distinguish between routes for access versus routes for recreation, and do not include alternatives that would minimize resource impacts.	
	<i>Response to Comments:</i> The Court’s Remedy Order required that the agency consider at least one alternative that analyzes a less extensive route network (Summary Judgment, Page 4 of 17, Lines 3-4). Alternative 2 was developed specifically to meet this requirement.	
	<i>Index to Comments</i>	
	Defenders of Wildlife and Sierra Club	176-28, 176-57
	Stephanie Weigel	210-1, 210-8
	Margaret Adam	211-8, 211-12
	Julia Dole	212-1, 212-3, 212-7, 212-8, 212-10, 212-17
	Donald Teschner	214-1, 214-3, 214-7, 214-8, 214-10, 214-17
	The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-3, 377-51, 377-52, 377-53, 377-54, 377-55, 377-109, 377-115, 377-119
	Center for Biological Diversity	379-80, 379-81, 379-82, 379-84, 379-85
	Desert Tortoise Council	380-73

<b>Comment 4.3-2: Analysis must include reasonable alternatives for increased access</b>	
<b>Summary of Comments:</b> These comments state that the analysis of alternatives in the DSEIS does not provide reasonable alternatives to address enhanced motorized access for recreational activities, youth access, and elderly and disabled.	
<b>Response to Comments:</b> Alternative 3 was specifically developed to analyze a route network that provides enhanced OHV access.	
<b>Index to Comments</b>	
Capital Trail Vehicle Association	54-2, 54-3, 54-4, 54-5
<b>Comment 4.3-3: Opposition to use of non-mechanical designation outside wilderness</b>	
<b>Summary of Comments:</b> Unless called for by management protocols (i.e. PCT), special resource concerns, or chronic user conflicts, the “non-mechanical” designation should be used only for transportation linear disturbances within wilderness, and those outside wilderness should be designated “non-motorized.”	
<b>Response to Comments:</b> By definition motorized (OHV) activities are not authorized on transportation linear disturbances whether inside or outside of wilderness. As noted in the comment, there are circumstances where a “non-mechanical” designation is appropriate as a minimization measure where sensitive resources are present.	
<b>Index to Comments</b>	
Randy Banis	138-3, 138-11
<b>Comment 4.3-4: Opposition to segmentation of routes for designation</b>	
<b>Summary of Comments:</b> These comments state that the segmentation of routes into small pieces makes it difficult for the public to review the designations.	
<b>Response to Comments:</b> BLM analyzed the route network based on the segmentation of routes in order to provide the granularity necessary to provide adequate evaluation of resources.	
<b>Index to Comments</b>	
Randy Banis	138-9
Irene Fisher	206-3
California Off-Road Vehicle Association	399-6
<b>Comment 4.3-5: Request to consider route longevity as a factor in designation</b>	
<b>Summary of Comments:</b> These comments request that “traditional” routes that are depicted on USGS maps should be given priority for being designated as motorized over new, less established routes.	
<b>Response to Comments:</b> Some “traditional” routes as depicted on USGS maps no longer exist on the ground and BLM determines its route designations on existing conditions and potential effects on resources.	
<b>Index to Comments</b>	
Randy Banis	138-10

<b>Comment 4.3-6: Failure to consider comments provided through other mechanisms in the current route designations</b>	
<i>Summary of Comments:</i> These comments object that the current route designations did not specifically consider route-specific comments made on the DRECP or through other BLM planning documents.	
<i>Response to Comments:</i> The DRECP did not address route specific designations. Route specific comments that were received during the comment period for the 2018 Draft SEIS WMRNP were reviewed and incorporated where appropriate in Alternative 5.	
<i>Index to Comments</i>	
Lisbet Thoresen, Kim Erb, Jim Parrish, and Andrew Hoekstra	165-4, 165-5, 165-6
<b>Comment 4.3-7: Data used in the analysis should be maintained in Federal database</b>	
<i>Summary of Comments:</i> These comments request that data used in the analysis be maintained only in Federal and State databases, that no data from non-governmental organizations should be used, and that all data be available to the public for review.	
<i>Response to Comments:</i> The BLM is required to use the best available data when making any determination, which could include data from non-governmental organizations.	
<i>Index to Comments</i>	
California 4 Wheel Drive Association	406-3, 406-11
<b>Comment 4.3-8: Request designations and language ensuring military access</b>	
<i>Summary of Comments:</i> These comments request that the EIS specify that the WMRNP would not restrict the ability of the military to use routes historically used by the military.	
<i>Response to Comments:</i> The BLM received route specific comments both written and verbally regarding military use of routes and these were incorporated as appropriate in Alternative 5.	
<i>Index to Comments</i>	
U.S. Marine Corps Installations West	183-2

**Subsection 4.4 Preference for Alternatives and Route Designations that Favor Route Closure or Limitation to Enhance Resource Protection**

<b>Comment 4.4-1: General opposition to any alternative that increases the mileage of routes, or to designation of routes as motorized/open based on general citation of 43 CFR 8342.1 or the Court Order</b>	
<i>Summary of Comments:</i> These comments oppose adoption of Alternative 3 or 4, or generally oppose increasing the mileage of off-road vehicle (ORV) routes, and generally cite the minimization criteria in 43 CFR 8342.1, or refer to the requirements of the Court to minimize routes, as rationale to designate routes as closed. These comments typically do not provide a list of specific resources that are impacted, or do not cite a specific subsection of 43 CFR 8342.1. These comments also do not provide specific locations where routes should be closed, nor do they identify specific text in the DSEIS that is deficient.	

<b>Response to Comments:</b>	
<p>These are general comments that express a preference for route closure, but do not provide route-specific information. Where specific comments regarding the impact of a route to a specific resource have been made, the agency has reviewed the route designation and made revisions where appropriate.</p> <p>Both the CDCA Plan and FLPMA recognize the need to balance use of public lands with protection of public resources. As required by FLPMA, public lands must be managed in a manner that protects the quality of public land resources, and that provides for outdoor recreation and human occupancy and use (43 USC 1701(a)(8)). As discussed in Section 2.2.1 of the DSEIS, all alternatives incorporate the CDCA Plan goal to provide for the use and access to public lands, and resources within the CDCA, including economic, educational, scientific, and recreational uses, in a manner that enhances, wherever possible—and that does not diminish, on balance—the environmental, cultural and aesthetic values of the desert and of its productivity, as identified in Sections 601 and 103 of FLPMA. The CDCA Plan recognized the sometimes complex and conflicting mandates that provide for both use and protection of a variety of public resources, and the key role of access across public lands.</p> <p>Based on this need to balance access and resource protection, it is not possible or appropriate to close all routes that are co-located with potentially affected resources.</p>	
<b>Index to Comments</b>	
Sarah Kennington and Steve Bardwell (co-signed by 32 Morongo Basin residents)	151-14
Miriam Seger	162-5
Defenders of Wildlife and Sierra Club	176-17, 176-18
Stephanie Weigel	210-3
Julia Dole	212-1
Donald Teschner	214-1
Margaret Adam	221-3
Graciela Huth	249-1
Cathey Schneider	251-1
John Crump	255-1
Beth Anderson	256-1
Karen Espanol	257-1
Diane Bolton	263-2
Robin Morton	265-1
Geralyn Guldeth	269-1
Malcolm Groome	277-1
Gail Roberts	282-1
Helen Wagenvoord	284-1
Janice L Jones	289-1
Annette Bork	293-1
John M. Keefe	296-1
Karen McMurray	299-1
Nancy Oliver	300-1
Kathleen Ervin	302-1
Georgia Labey	304-1
Marcie Winter	305-1
Karil Hazard	306-1
Randall Boltz	308-1
Jan Summers	311-1

Ed Schmidt	314-1
Andrea Kean	315-1
Barbra Wright	316-1
Barry Katz	317-1
L. G. Jones Bedel	320-1, 320-2
Janet Lee Beatty	322-1
Rich Moser	347-1
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-20, 377-23, 377-24
Desert Tortoise Council	380-26
Sharon Dove	369-1
Doug Parham, Western San Bernardino County Landowner's Association	383-3
ORV Watch Kern County (TMA 4)	392-10
Kerncrest Audubon Society	400-6
Diane Kuntz (TMA 3)	401-1
Carla Cicchi	405-4
Neil Wierenga (Joshua Tree)	408-1, 408-6
Western Watersheds Project	411-1, 411-16
<b>Comment 4.4-2: General opposition to designation of routes as motorized/open based on 43 CFR 8342.1 (a)</b>	
<b>Summary of Comments:</b> -These comments oppose increasing the mileage of off-road vehicle (ORV) routes based on the minimization criteria in 43 CFR 8342.1 (a). These comments generally cite one or more resources covered under 43 CFR 8342.1 (a), including soil, watershed, vegetation, air, other resources of the public lands (such as cultural resources), and wilderness suitability. These comments do not provide specific locations where routes should be closed, nor do they identify specific text in the DSEIS that is deficient.	
<b>Response to Comments:</b> These are general comments that express a preference for route closure in order to protect soil, watershed, vegetation, air, other resources of the public lands (such as cultural resources), and wilderness suitability. Impacts to these resources were considered in the designation of all routes, using the process described in Section 2.1.4 of the DSEIS. However, these comments do not provide route-specific information. Where specific comments regarding the impact of a route to a specific resource have been made, the agency has reviewed the route designation and made revisions where appropriate. Based on the need to balance access and resource protection, it is not possible or appropriate to close all routes that are co-located with potentially affected resources.	
<b>Index to Comments</b>	
James Hammons	6-1
Kendra Atleework	8-1
Zoe Pedford	14-1
Laurie Kaye and Curt Fisher	39-3
Comment letter #65 is a form letter received from approximately 2,416 commenters	65-1, 65-3, 65-6
Comment letter #111 is a form letter received from approximately 14 commenters	111-8
Defenders of Wildlife and Sierra Club	176-71
California Native Plant Society	179-2
Paul Pearson	204-2

Margaret Adam	211-6, 211-9
Julia Dole	212-2, 212-16, 212-17
Donald Teschner	214-2, 214-16, 214-17
Paul Hadley and Wendy Hadley	215-2
Zandria Petteway-Barton	227-1
Andrea Salinas	236-1
Ken Sanford	238-1
Fred Rinne	241-1
Richard McDowell	350-4
Diane Mitchell (Wonder Valley)	385-1
ORV Watch Kern County (TMA 4)	392-8, 392-12
<b>Comment 4.4-3: General opposition to designation of routes as motorized/open based on 43 CFR 8342.1 (b)</b>	
<p><b>Summary of Comments:</b>                  These comments oppose increasing the mileage of off-road vehicle (ORV) routes based on the minimization criteria in 43 CFR 8342.1 (b). These comments generally cite one or more resources covered under 43 CFR 8342.1 (b), including wildlife and wildlife habitats. These comments do not provide specific locations where routes should be closed, nor do they identify specific text in the DSEIS that is deficient.</p>	
<p><b>Response to Comments:</b>                  These are general comments that express a preference for route closure in order to protect wildlife, wildlife habitats, and areas designated for the protection of wildlife resources. Impacts to these resources were considered in the designation of all routes, using the process described in Section 2.1.4 of the DSEIS. However, these comments do not provide route-specific information. Where specific comments regarding the impact of a route to a specific resource have been made, the agency has reviewed the route designation and made revisions where appropriate.                  Based on the need to balance access and resource protection, it is not possible or appropriate to close all routes that are co-located with potentially affected resources.</p>	
<b>Index to Comments</b>	
Joanne S. McBirney	24-1
Laurie Kaye and Curt Fisher	39-4
Sue Cossins	40-1
E.A. Allen	61-1, 61-2
Comment letter #111 is a form letter received from approximately 14 commenters	111-8, 111-9
Chester and Deborah Rucker	112-3, 112-4
Desert Tortoise Preserve Committee	117-8, 117-11
Linda Doyle	118-8, 118-9
Robert Kaplan	119-3, 119-9
Friends of Big Morongo Canyon Preserve	120-2
Matt Adrian and Kimberly Bagwill	145-2
Sarah Kennington and Steve Bardwell (co-signed by 32 Morongo Basin residents)	151-15
Miriam Seger	162-5
Defenders of Wildlife and Sierra Club	176-39, 176-45, 176-71
Doria Talley	180-2

Gordon Zittel	199-6
Paul Pearson	204-2
Margaret Adam	211-6
Julia Dole	212-17
Donald Teschner	214-17
Paul Hadley and Wendy Hadley	215-2
Zandria Petteway-Barton	227-1
Debra (no last name given)	233-1
Andrea Salinas	236-1
Ken Sanford	238-1
David Holloway	240-1
Fred Rinne	241-1
Nancy Griffin	242-1
Sue Ann Schoonmaker	243-1
Bill Blazelowski	245-1
Alan Solomon	248-1
Graciela Huth	249-1
Barbra Jean Adams	297-1
Oliver Leroy	325-1
Karen Cappa	326-1
Beth Havens	327-1
Dr. C. Cavette	328-1
Richard McDowell	350-3
Desert Tortoise Council	380-10
ORV Watch Kern County (TMA 4)	392-4, 392-7
Transition Habitat Conservancy	398-2
Carla Cicchi	405-2
Neil Wierenga (Joshua Tree)	408-4, 408-5
Mary Dellavalle	409-3
<b>Comment 4.4-4: General opposition to designation of routes as motorized/open based on 43 CFR 8342.1 (d)</b>	
<b><i>Summary of Comments:</i></b> These comments oppose increasing the mileage of off-road vehicle (ORV) routes based on the minimization criteria in 43 CFR 8342.1 (d). These comments generally cite the presence of routes in or near officially designated Wilderness Areas or Wilderness Study Areas. Most of these comments do not provide specific locations where routes should be closed, nor do they identify specific text in the DSEIS that is deficient.	
<b><i>Response to Comments:</i></b> These are general comments that express a preference for route closure in order to protect designated Wilderness Areas or Wilderness Study Areas. Impacts to these areas were considered in the designation of all routes, using the process described in Appendix D.4 of the DSEIS. However, these comments do not provide route-specific information. Where specific comments regarding the impact of a route to a specific resource have been made, the agency has reviewed the route designation and made revisions where appropriate. Based on the need to balance access and resource protection, it is not possible or appropriate to close all routes that are co-located with potentially affected resources.	
<b><i>Index to Comments</i></b>	
Laurie Kaye and Curt Fisher	39-6

	Comment letter #65 is a form letter received from approximately 2,416 commenters	65-6
	Morongo Basin Conservation Association	156-6
	California Native Plant Society	179-15
	Paul Pearson	204-2
	Margaret Adam	221-5
	Mary Dellavalle	409-4
<b>Comment 4.4-5: General opposition to designation of routes as motorized/open in desert washes, dry lakes, sand dune areas, and/or riparian areas</b>		
	<b>Summary of Comments:</b> The comments generally request that routes in desert washes, dry lake, and sand dune areas be designated as closed. The comments do not provide specific locations or rationale, nor do they identify specific text in the Draft SEIS that is deficient.	
	<b>Response to Comments:</b> These are general comments that express a preference for route closure in order to protect resources associated with desert washes, dry lakes, and/or sand dune areas. Impacts to these areas were considered in the designation of all routes, using the process described in Section 2.1.4 of the DSEIS. However, these comments do not provide route-specific information. Where specific comments regarding the impact of a route to a specific resource have been made, the agency has reviewed the route designation and made revisions where appropriate. Based on the need to balance access and resource protection, it is not possible or appropriate to close all routes that are co-located with potentially affected resources.	
	<b>Index to Comments</b>	
	Desert Tortoise Preserve Committee	117-12
	Defenders of Wildlife and Sierra Club	176-49, 176-50, 176-51, 176-52
	Julia Dole	212-17
	Donald Teschner	214-17
	The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-29
	Mary Dellavalle	409-2
<b>Comment 4.4-6: Request routes that are duplicative be designated as closed</b>		
	<b>Summary of Comments:</b> The commenters request that the WMRNP does not designate as motorized/open any vehicle routes that are duplicative. The comments do not provide specific locations, nor do they identify specific text in the DSEIS that is deficient.	
	<b>Response to Comments:</b> These are general comments that state a preference for closure of routes based only on duplication. Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Duplication, on its own, is not a criterion in 43 CFR 8342.1 and therefore was not directly used as a criterion in the WMRNP analysis. However, in cases where duplication had led to identifiable user conflicts or resource impacts, and where the duplicative routes could be closed without unacceptable disruption to access needs, then these routes were closed. BLM has solicited input from the public regarding routes that may be causing user conflicts or resource impacts, including cases where these impacts are caused by route duplication. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future. The BLM is removing duplicate routes from the route network as they are identified.	
	<b>Index to Comments</b>	

	Laurie Kaye and Curt Fisher (TMA 3)	39-3, 39-4, 39-5, 39-6
<b>Comment 4.4-7: Request routes that could lead to vehicle trespass be designated as closed</b>		
<p><b>Summary of Comments:</b>                  The commenters request that the WMRNP does not designate as motorized/open any vehicle routes that could lead to trespass into Wilderness Areas, onto mitigation lands, across private land, onto adjacent Federal land such as Department of Defense land or National Parks, or onto adjacent ACECs. The comments often state that designating routes adjacent to these areas gives the appearance of BLM making designations for routes that are outside of BLM jurisdiction (i.e., authorizing motorized use on the adjacent land). The comments do not provide specific locations, nor do they identify specific text in the DSEIS that is deficient.</p>		
<p><b>Response to Comments:</b>                  These are general comments that state a preference for closure of routes based only on the potential for trespass on adjacent jurisdictions. Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Potential for trespass, on its own, is not a criterion in 43 CFR 8342.1 and therefore was not directly used as a criterion in the WMRNP analysis. However, in cases where trespass had led to identifiable user conflicts or resource impacts, and where the routes could be closed without unacceptable disruption to access needs, then these routes were closed. BLM has solicited input from the public regarding routes that may be causing user conflicts or resource impacts, including cases where these impacts are caused by trespass. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future.                  In some cases, access needs dictated a need for routes that appear to provide a potential for trespass. Therefore, the appearance of the potential for trespass, on its own, cannot be used to close routes.</p>		
<b>Index to Comments</b>		
Comment letter #3 is a form letter received from approximately 29 commenters		3-6, 3-8
Stephanie J. Weigel		35-8, 35-10
Comment letter #111 is a form letter received from approximately 14 commenters		111-6, 111-8
Sean Blau		114-8, 114-10
Linda Doyle		118-3, 118-9
Robert Kaplan		119-4
Jacob Forman		125-6, 125-8
Sarah Kennington and Steve Bardwell (co-signed by 32 Morongo Basin residents)		151-2
Michael Cohen and Nancy Barton		160-1, 160-3, 160-10
Adrian Field, Blanca Martinez, Paul Pearson, Olive Toscani		166-7, 166-11
Defenders of Wildlife and Sierra Club		176-1, 176-14, 176-20
Chris Carraher, Eric Hamburg, Beth Sheffield, Ken Sitz, Teresa Sitz		178-6, 178-10
U.S. Marine Corps Installations West		183-1
Peggy Lee Kennedy		186-7, 186-9
William Blau		189-8, 189-10
Comment letter #196 is a form letter received from 5 commenters		196-3
Teresa Sitz		203-8

	Paul Pearson	204-1
	Stephanie Weigel	210-7
	Margaret Adam	211-1, 211-11
	Julia Dole	212-2, 212-7, 212-11, 212-12, 212-13
	Donald Teschner	214-2, 214-7, 214-11, 214-12, 214-13
	Margaret Adam	221-2, 221-6, 221-7
	Laraine Turk	234-7, 234-8
	Richard McDowell	351-7, 351-9
	Western San Bernardino County Landowner's Association	383-6, 383-8, 383-11, 383-12
	Neil Wierenga (Joshua Tree)	408-2
<b>Comment 4.4-8: Request that route designations be more closely aligned with on-the-ground data from field surveys</b>		
	<b>Summary of Comments:</b> The commenters question whether routes identified in the inventories actually exist on the ground. Some of them request that the WMRNP not designate as motorized/open any vehicle routes that have not been surveyed in the field within the past 5 years. Other comments suggest that field survey data would provide valuable data on route usage, which would then improve the designation process. The comments do not provide specific locations, nor do they identify specific text in the DSEIS that is deficient.	
	<b>Response to Comments:</b> As discussed on Page 2-18, the GIS route inventory data was checked against field surveys in 2012. In addition, BLM has encouraged the public to provide route-specific comments on the current status and use of routes. More than 5,600 route specific comments were received in the public comment period. BLM individually reviewed these comments and made appropriate changes to route designations, subdesignations, etc. if needed. Additional changes to the route inventory and network will be made in the future as issues are identified by BLM staff, or are communicated to BLM by the public.	
	<b>Index to Comments</b>	
	Defenders of Wildlife and Sierra Club	176-8, 176-24
	California Native Plant Society	179-2, 179-3, 179-4, 179-5, 179-7, 179-9, 179-22
	Comment letter #195 is a form letter received from 6 commenters	195-1, 195-2
	The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-113
<b>Comment 4.4-9: Request that all routes that have been created illegally should be designated as closed</b>		
	<b>Summary of Comments:</b> The comments request that all routes that have been created illegally, as a result of route proliferation, should be designated as closed in the WMRNP.	

<b><i>Response to Comments:</i></b>	
<p>These are general comments that state a preference for closure of routes based only on the manner in which they were created. Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. The manner of route creation, on its own, is not a criterion in 43 CFR 8342.1, and because there is no way to tell if a particular route was created illegally, this was not directly used as a criterion in the WMRNP analysis. In cases where a route may have been created illegally, it was still evaluated for access needs, user conflicts, and resource impacts, and where the routes could be closed without unacceptable disruption to access needs, then these routes were closed. BLM has solicited input from the public regarding routes that may be causing user conflicts or resource impacts, including cases where these impacts are caused by illegally-created routes. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future.</p>	
<b><i>Index to Comments</i></b>	
E.A. Allen	61-2
Pam Nelson	62-5
Comment letter #64 is a form letter received from approximately 3,520 commenters	64-3
Comment letter #65 is a form letter received from approximately 2,416 commenters	65-2
Friends of Big Morongo Canyon Preserve	120-2
Friends of Juniper Flats	175-1
Defenders of Wildlife and Sierra Club	176-9, 176-10, 176-24, 176-38
California Native Plant Society	179-8
Doria Talley	180-3
Comment letter #195 is a form letter received from 6 commenters	195-4, 195-5
Comment letter #196 is a form letter received from 5 commenters	196-2
Margaret Adam	211-1, 211-6
Charles Bennett DeLancey	235-1
Chris Lish	333-3
F Hammer	335-3
Roman LoBianco	336-3
Kathleen McConn	339-3
Katie Fagan	341-3
Stewart Wilber	342-3
Mlou Christ	345-2
Janet Fiore	346-2
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-68, 377-75, 377-76
Desert Tortoise Council	380-165
ORV Watch Kern County (TMA 4, 7)	392-2, 393-6, 392-13
<b>Comment 4.4-10: Request routes in areas that are proposed for protection in other BLM plans be designated as closed</b>	

<b>Summary of Comments:</b>	
The commenters request that the WMRNP not designate as motorized/open any vehicle routes that are in areas proposed for protection under other BLM plans, including in conservation areas (ACECs, CDNCLs, and LWCs), and either close them or designate them as hiking or equestrian trails. Some of the comments request a delay in both WMRNP and DRECP so that they can be coordinated. Other comments state that the resource layers on the DSEIS maps should be revised to incorporate the DRECP recommendations. Some of these comments provide specific locations, while others do not. The comments do not identify specific text in the DSEIS that is deficient.	
<b>Response to Comments:</b>	
Alternative 5 in the Draft SEIS was revised to incorporate decisions made in the DRECP. The public comment period for the WMRNP was re-opened in March 2018 in order to allow BLM to incorporate the final DRECP decisions into the evaluation of a revised WMRNP alternative (Alternative 5).	
<b>Index to Comments</b>	
Desert Tortoise Preserve Committee	117-13, 117-14
Friends of Big Morongo Canyon Preserve	120-4
Marc Eldridge	122-1
Morongo Basin Conservation Association	156-7
Defenders of Wildlife and Sierra Club	176-22, 176-39, 176-46, 176-58, 176-59, 176-62, 176-63, 176-64, 176-69
California Native Plant Society	179-10, 179-11, 179-12, 179-13, 179-14, 179-15
Margaret Adam	211-9
Julia Dole	212-17
Donald Teschner	214-17
Roger Hollander	329-1
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-79, 377-84, 377-85, 377-86, 377-87, 377-90
Center for Biological Diversity	379-16
Western Watersheds Project	411-6, 411-21, 411-22, 411-23, 411-24
<b>Comment 4.4-11: Request that routes in wildlife mitigation lands be designated as closed</b>	
<b>Summary of Comments:</b>	
The commenters request that the WMRNP not designate as motorized/open any vehicle routes in or adjacent to lands designated as wildlife mitigation, land bank, or land trust, including lands established as mitigation for large-scale renewable energy projects, and lands managed for conservation by other agencies. Some of the comments request that mitigation lands be identified, and impacts to them specifically analyzed, in the DSEIS. The comments do not provide specific locations, nor do they identify specific text in the DSEIS that is deficient.	

<b><i>Response to Comments:</i></b>	
<p>These are general comments that state a preference for closure of routes based only on their presence in or proximity to mitigation lands. There is no regulation or requirement for BLM to limit access in or near mitigation lands or preclude route designation within these areas. Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Presence in or proximity to mitigation lands, on its own, is not a criterion in 43 CFR 8342.1 and therefore was not directly used as a criterion in the WMRNP analysis. However, in cases where routes within or adjacent to mitigation lands could be closed without unacceptable disruption to access needs, such as in the Desert Tortoise Research Natural Area, then these routes were closed. BLM has solicited input from the public and resource agencies regarding routes that may be causing user conflicts or resource impacts, including cases where these impacts are caused by routes within or adjacent to mitigation lands. BLM has made changes in response to this input, and will continue to solicit input and make appropriate route designation changes in the future.</p> <p>In some cases, access needs dictated a need for routes that are located within or adjacent to mitigation lands. Therefore, the presence of a route within or adjacent to mitigation lands, on its own, cannot be used to close routes. BLM is not making any route designations on lands not under BLM management.</p>	
<b><i>Index to Comments</i></b>	
Desert Tortoise Preserve Committee	117-17
Defenders of Wildlife and Sierra Club	176-1, 176-2, 176-40
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-77
Desert Tortoise Council	380-7
Desert Tortoise Council	412-10, 412-52, 412-67
<b>Comment 4.4-12: Request to remove monument areas from WMRNP</b>	
<b><i>Summary of Comments:</i></b> The comments request that the newly designated monuments not be included in the WMRNP, and instead be addressed by monument-specific management plans.	
<b><i>Response to Comments:</i></b> The WMRNP will serve as the interim travel management plan for the national monuments until monument-specific management plans are completed.	
<b><i>Index to Comments</i></b>	
Pam Nelson	62-2
Comment letter #64 is a form letter received from approximately 3,520 commenters	64-4
Comment letter #65 is a form letter received from approximately 2,416 commenters	65-5
Friends of Big Morongo Canyon Preserve	120-1, 120-5, 120-6
Sarah Kennington and Steve Bardwell (co-signed by 32 Morongo Basin residents)	151-1
Morongo Basin Conservation Association	156-27
Defenders of Wildlife and Sierra Club	176-31, 176-32, 176-56, 176-69
The Wilderness Society	177-1, 177-2, 177-3, 177-4, 177-5, 177-6, 177-8, 177-9, 177-10, 177-11

	California Native Plant Society	179-16
	Chris Lish	333-4
	Esther Shaw	334-2
	F Hammer	335-4
	Roman LoBianco	336-4
	Kathleen McConn	339-4
	Katie Fagan	341-4
	Stewart Wilber	342-4
	Mlou Christ	345-3
	Janet Fiore	346-3
	The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-4, 377-64, 377-65, 377-66, 377-69, 377-70, 377-71, 377-72, 377-73, 377-74, 377-76, 377-116, 377-117
	Michael Degnan	402-2
	Conservation Lands Foundation	404-1, 404-2
	Carla Cicchi	405-6
	Western Watersheds Project	411-2, 411-20
<b>Comment 4.4-13: Request to remove ACEC areas from WMRNP</b>		
	<b>Summary of Comments:</b> The comments request that the WMRNP not be used to supplant route designation decisions made in ACEC-specific management plans.	
	<b>Response to Comments:</b> The ACEC-specific management plans were reviewed for any route specific designation decisions and any modifications proposed under the WMRNP were evaluated utilizing the relevance and importance criteria.	
	<b>Index to Comments</b>	
	Defenders of Wildlife and Sierra Club	176-7
<b>Comment 4.4-14: Request to designate routes that are very short, or which have no name or number, or are not shown on maps, as closed</b>		
	<b>Summary of Comments:</b> These comments generally request that very short routes be closed, because they do not meet basic characteristics that BLM has defined for WEMO, or because they are not named or numbered, or are not shown on maps. The comments state that these types of routes tend to occur in checker-boarded land, resulting in very short segments connecting on both ends to private land. The routes are often called “orphan routes”. The comments do not provide specific locations, nor do they identify specific text in the DSEIS that is deficient.	

<b><i>Response to Comments:</i></b>	
<p>These are general comments that state a preference for closure of routes based only on their short length, or lack of an identifying route number. Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Length or assignment of a route number, on its own, are not criteria in 43 CFR 8342.1 and therefore were not directly used as criteria in the WMRNP analysis. However, in cases where short routes had led to identifiable user conflicts or resource impacts, and where the short routes could be closed without unacceptable disruption to access needs, then these routes were closed. BLM has solicited input from the public regarding routes that may be causing user conflicts or resource impacts, including cases where these impacts are caused by short routes or routes with no previously designated route number or name. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future.</p> <p>In some cases, access needs dictated a need for routes that appear to be too short to support an access need. Therefore, the appearance of short routes on a map, on its own, cannot be used to close routes.</p>	
<b><i>Index to Comments</i></b>	
Comment letter #111 is a form letter received from approximately 14 commenters	111-7
ORV Watch Kern County	132-2
Paul Pearson	204-1, 204-4
Stephanie Weigel	210-1, 210-3, 210-5, 210-6
Julia Dole	212-8
Donald Teschner	214-8
Laraine Turk	234-7
<b>Comment 4.4-15: Request to reduce routes designated as motorized/open because agency is not properly managing the existing network</b>	
<b><i>Summary of Comments:</i></b>	
<p>These comments state that routes should be designated as closed because BLM is not properly managing or enforcing limitations on the existing network, does not have the budget to manage the current network or an expanded network, and/or is not actively rehabilitating closed routes, thus allowing them to be used and expanded. The comments request that routes be closed to ORVs unless posted open, in order to prevent illegal new routes. Some comments request that BLM maintain the current law enforcement compliance patrol and compliance monitoring indefinitely. One comment notes that BLM allows inaccurate trail maps published by unofficial OHV groups to be posted at kiosks, resulting in unauthorized uses. The comments do not provide specific locations, nor do they identify specific text in the DSEIS that is deficient.</p>	

<b>Response to Comments:</b>	
Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. BLM considered areas of non-compliance and route proliferation when developing route designations under each alternative. In cases where non-compliance had led to identifiable user conflicts or resource impacts, and where routes in non-compliance areas could be closed without unacceptable disruption to access needs, then these routes were closed. BLM has solicited input from the public regarding routes that may be causing user conflicts or resource impacts, including routes within non-compliance and route proliferation areas. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future. Please see the section on signing in the TMPs for additional information regarding the signing of routes within the planning area, and the section on law enforcement for information on funding related to enforcement.	
<b>Index to Comments</b>	
Desert Tortoise Preserve Committee	117-13, 117-18
ORV Watch Kern County	132-3
Paul and Wendy Hadley	167-4
Defenders of Wildlife and Sierra Club	176-1, 176-6, 176-9, 176-19, 176-21, 176-24, 176-27, 176-28, 176-55, 176-60, 176-61, 176-70, 176-93
California Native Plant Society	179-18, 179-20
Peggy Lee Kennedy	186-1
Comment letter #196 is a form letter received from 5 commenters	196-2, 196-3
Teresa Sitz	203-10
Paul Pearson	204-4
Stephanie Weigel	210-7
Margaret Adam	211-1, 211-3, 211-4, 211-6, 211-7, 211-12
Julia Dole	212-2, 212-9, 212-11
Donald Teschner	214-2, 214-9, 214-11
Paul Hadley and Wendy Hadley	215-3
Zandria Petteway-Barton	227-2
Carol Wiley	228-2
Charles Bennett DeLancey	235-1
Graciela Huth	249-1
Rich Moser	347-1
Desert Tortoise Council	380-9
Transition Habitat Conservancy	398-1
Desert Tortoise Council	412-54, 412-58, 412-59
<b>Comment 4.4-16: Request to reduce routes designated as motorized/open because of the economic impact</b>	

<b>Summary of Comments:</b> These comments generally oppose OHV use resulting from route designation because it has a negative impact on property values, County tax receipts, tourism, costs for local law enforcement, and/or costs to local residents for road maintenance. The comments do not provide specific locations, nor do they identify specific text in the DSEIS that is deficient.	
<b>Response to Comments:</b> The potential economic impacts associated with the WMRNP were analyzed in Chapters 3 and 4 of the Draft SEIS.	
<b>Index to Comments</b>	
Comment letter #3 is a form letter received from approximately 29 commenters	3-4, 3-5, 3-8
Stephanie J. Weigel	35-6, 35-7, 35-10
Comment letter #111 is a form letter received from approximately 14 commenters	111-4, 111-5, 111-8
Sean Blau	114-6, 114-7, 114-10
Linda Doyle	118-4, 118-5, 118-9
Robert Kaplan	119-5, 119-6, 119-9
Jacob Forman	125-4, 125-6, 125-8
ORV Watch Kern County	132-4, 132-5
Sarah Kennington and Steve Bardwell (co-signed by 32 Morongo Basin residents)	151-2, 151-4
Michael Cohen and Nancy Barton	160-4, 160-5, 160-8
Miriam Seger	162-2, 162-3
Adrian Field, Blanca Martinez, Paul Pearson, Olive Toscani	166-5, 166-6, 166-11
Paul and Wendy Hadley	167-5
Defenders of Wildlife and Sierra Club	176-3, 176-4
Chris Carraher, Eric Hamburg, Beth Sheffield, Ken Sitz, Teresa Sitz	178-4, 178-5, 178-10, 178-8
Peggy Lee Kennedy	186-5, 186-6, 186-9
William Blau	189-6, 189-7, 189-10
Gordon Zittel	199-4, 199-5
Margaret Adam	211-2, 211-10
Margaret Adam	221-4
Laraine Turk	234-8
Richard McDowell	351-5, 351-6, 351-9
Western San Bernardino County Landowner's Association	383-4, 383-5, 383-6, 383-8
Kerncrest Audubon Society	400-4
<b>Comment 4.4-17: Present other alternatives that reduce the number and mileage of proposed motorized routes</b>	

<b>Summary of Comments:</b> These comments generally request that BLM present or analyze additional alternatives that reduce the number and mileage of motorized/open routes, or that are designed for greater protection of specific resources. The comments commonly state that none of the four alternatives are acceptable. The comments do not provide specific locations, nor do they identify specific text in the DSEIS that is deficient.	
<b>Response to Comments:</b> The Court's Remedy Order required that the agency consider at least one alternative that analyzes a less extensive route network (Summary Judgment, Page 4 of 17, Lines 3-4). Alternative 2 was developed specifically to meet this requirement.	
<b>Index to Comments</b>	
Desert Tortoise Preserve Committee	117-19
Margaret Adam	211-8
Julia Dole	212-1, 212-3, 212-7, 212-8, 212-10, 212-11, 212-17
Donald Teschner	214-1, 214-3, 214-7, 214-8, 214-10, 214-11, 214-17
Center for Biological Diversity	379-6
Desert Tortoise Council	380-148
Desert Tortoise Council	412-13, 412-14, 412-16
<b>Comment 4.4-18: General support for Alternative 2</b>	
<b>Summary of Comments:</b> These comments generally prefer selection of Alternative 2. The comments do not provide specific locations, nor do they identify specific text in the DSEIS that is deficient.	
<b>Response to Comments:</b> Comments that offered general support for Alternative 2, generally did provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS.	
<b>Index to Comments</b>	
Comment letter #3 is a form letter received from approximately 29 commenters	3-2, 3-10
Stephanie J. Weigel	35-2, 35-12
Comment letter #66 is a form letter received from approximately 361 commenters	66-1
Comment letter #111 is a form letter received from approximately 14 commenters	111-1
Sean Blau	114-1, 114-2, 114-12
Desert Tortoise Preserve Committee	117-5
Jacob Forman	125-1, 125-9
Mojave Desert Land Trust	136-4
Morongo Basin Conservation Association	156-28
Michael Cohen and Nancy Barton	160-1, 160-10
Adrian Field, Blanca Martinez, Paul Pearson, Olive Toscani	166-2, 166-13
Chris Carraher, Eric Hamburg, Beth Sheffield, Ken Sitz, Teresa Sitz	178-2, 178-12
California Native Plant Society	179-1
Doria Talley	180-1
Peggy Lee Kennedy	186-3, 186-11

**WEST MOJAVE (WEMO) ROUTE NETWORK PROJECT  
SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT**

William Blau	189-1, 189-3, 189-12
James Erickson	191-1, 191-3
Gordon Zittel	199-1
Richard Maselow	217-1
Margaret Adam	221-1, 221-8
Christina Amarillas	222-1
Carol Wiley	228-1
Laraine Turk	234-2, 234-9
Fred Rinne	241-1
Nancy Griffin	242-1
Sue Ann Schoonmaker	243-1
Diane Hesford	244-1
Bill Blazelowski	245-1
Gail Blumberg	246-1
Carol Tao	253-1
Noreen Lawlor	258-1
Fred Spasm	259-1
Ellen Evans	260-1
Darlene Goguen	262-1
Diane Bolon	263-1
Joyce Kolasa	264-1
Charles Anderson	266-1
Alan Lambert	267-1
Gary Bailey	268-1
Linda L Melton	270-1
Chuck Anderson	271-1
Jackie Pomies	274-1
Jessica Carr	278-1
Brian Carr	279-1
Nacy Riggleman	280-1
Susanne Madden	281-1
Jon Povill	283-1
Helen Wagenvoord	284-1
Andrea Bonnett	285-1
Dawn Baier	286-1
Richard Blain	288-1
John Nichols	290-1
Leah Quenelle	391-1
Lisa Kellman	294-1
Jo Ellen Young	295-1
Dr. John W. Cruz	301-1
Clara Beard	307-1
Beverly Magid	312-1
Phillip King	318-1
Marilyn Page	323-1
Miriam Faugno	324-1
Sean Davison	344-2
Richard McDowell	351-3, 351-11

Gabriel and Jaymie Arquilevich	361-1, 361-2
Blake Baxter	368-2
Desert Tortoise Council	380-201
Western San Bernardino County Landowner's Association	383-2, 383-8, 383-10
Ken Wilkerson (TMA 3)	387-1
Jane Mc Rae (TMA 3)	388-2
Brad Dunning (TMA 3)	390-1
Brenda Burnett, Kerncrest Audubon Society	400-2
Diane Kuntz (TMA 3)	401-2
Western Watersheds Project	411-14
<b>Comment 4.4-19: General opposition to Alternative 4 as being too open</b>	
<b>Summary of Comments:</b> These comments generally oppose selection of Alternative 4, because it allows too many routes to remain motorized, and the commenter prefers a smaller motorized route network.	
<b>Response to Comments:</b> Comments that offered general support for Alternative 4, generally did provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS.	
<b>Index to Comments</b>	
Comment letter #3 is a form letter received from approximately 29 commenters	3-2, 3-8, 3-10
Laurie Redmond	33-1
Stephanie J. Weigel	35-2, 35-10, 35-12
Comment letter #111 is a form letter received from approximately 14 commenters	111-8
Sean Blau	114-3, 114-10, 114-12
Jacob Forman	125-1, 125-8, 125-9
Mojave Desert Land Trust	136-4
Michael Cohen and Nancy Barton	160-1, 160-8, 160-10
Adrian Field, Blanca Martinez, Paul Pearson, Olive Toscani	166-2, 166-11, 166-13
Chris Carraher, Eric Hamburg, Beth Sheffield, Ken Sitz, Teresa Sitz	178-2, 178-10, 178-12
California Native Plant Society	179-21
Peggy Lee Kennedy	186-3, 186-9, 186-11
William Blau	189-3, 189-10, 189-12
Julia Dole	212-8
Donald Teschner	214-8
Margaret Adam	221-5, 221-8
Laraine Turk	234-2, 234-9
Sean Davison	344-2
Richard McDowell	351-3, 351-9, 351-11
Gabriel and Jaymie Arquilevich	361-2

	Blake Baxter	368-3
	Western San Bernardino County Landowner's Association	383-2, 383-3, 383-10
	Jane Mc Rae (TMA 3)	388-2
	Brad Dunning	390-2
<b>Comment 4.4-20: Opposition to designation of motorcycle routes</b>		
	<b>Summary of Comments:</b> These comments generally oppose any designation of motorcycle routes, because of their level of impacts, and because BLM does not have the capability to enforce limitations on these routes.	
	<b>Response to Comments:</b> Motorcycle routes were added based on public comments. These additions are consistent with CFR 8342.1 and incorporate appropriate enforcement and minimization measures are being implemented to address potential impacts. Specific issues brought forth by the public comment are addressed in the Travel Management Plans implementation strategies.	
	<b>Index to Comments</b>	
	Friends of Juniper Flats	175-1
	Defenders of Wildlife and Sierra Club	176-9, 176-34, 176-35, 176-60, 176-93
	Comment letter #195 is a form letter received from 6 commenters	195-4
<b>Comment 4.4-21: Opposition to designation of routes closed in Alternative 1 as motorized in Alternative 2</b>		
	<b>Summary of Comments:</b> These comments oppose any designation of routes as motorized in Alternative 2 that were not designated as open in Alternative 1.	
	<b>Response to Comments:</b> Some routes that were closed in Alternative 1 were opened in Alternative 2 to provide efficient connectivity within the network, and to reduce resource conflicts.	
	<b>Index to Comments</b>	
	Defenders of Wildlife and Sierra Club	176-33, 176-36
<b>Comment 4.4-22: Opposition to recreational shooting</b>		
	<b>Summary of Comments:</b> These comments oppose recreational shooting in areas where nesting falcons can be disturbed.	
	<b>Response to Comments:</b> This comment was not addressed because it is outside of the scope WMRNP.	
	<b>Index to Comments</b>	
	Steve Shaw	220-1
<b>Comment 4.4-23: Opposition to designating routes as motorized/open in grazing allotments</b>		
	<b>Summary of Comments:</b> These comments oppose designating routes within grazing allotments as open to the public. They request that routes be designated as authorized only for the ranchers, or should be signed with a 15 MPH limit.	
	<b>Response to Comments:</b> Grazing allotments do not provide exclusive use, and the BLM has to provide for multiple uses; including public access. Designated routes within grazing allotments provide for efficient connectivity within the network, and reduces resource conflicts.	
	<b>Index to Comments</b>	
	Julie Mitchell	237-1

**Subsection 4.5 Preference for Alternatives and Route Designations that Favor Route Closure or Limitation to Reduce User Conflicts, and to Enhance Non-Motorized and Non-Mechanized Recreation**

**Comment 4.5-1: Request to designate routes based on full-range of recreational uses**

<b>Summary of Comments:</b>	
<p>These comments generally request that BLM consider the full range of recreational uses, not just trail riding or OHV use, in making route designations. These are general comments that express a preference for designating for a specific recreational use, in order to enhance access and recreation opportunities and avoid conflicts between motorized use and other recreational activities. Specific recreation uses cited include hiking, biking, rockhounding, horse riding, and camping. Some of the comments object to the focus of the DSEIS on motorized recreation by non-street-legal vehicles, instead of non-motorized and non-mechanized recreation.</p>	
<b>Response to Comments:</b>	
<p>The comments in favor of designating routes based on all of their potential recreation uses are noted. Access and recreation opportunities were considered in the designation of all routes, using the process described in Section 2.1.4 of the DSEIS. However, these comments do not provide route-specific information. Where specific comments regarding the need to provide access or a certain recreation use have been made, the agency has reviewed the route designation and made revisions where appropriate.</p> <p>Based on the need to balance access and resource protection, it is not possible or appropriate to designate all routes that would enhance specific access or recreation activities.</p>	
<b>Index to Comments</b>	
Capital Trail Vehicle Association	54-1, 54-12, 54-17
Pam Nelson	62-1, 62-6
Comment letter #65 is a form letter received from approximately 1,203 commenters	65-4
Morongo Basin Conservation Association	156-9
California Department of Parks and Recreation	161-3, 161-4, 161-5
Lisbet Thoresen, Kim Erb, Jim Parrish, and Andrew Hoekstra	165-2
Over the Hill Track Club	182-1, 182-1
Peggy Lee Kennedy	186-1
Comment letter #196 is a form letter received from 5 commenters	196-1
Comment letter #197 is a form letter received from approximately 28 commenters	197-1
Carol Wiley	228-2, 228-4
Charles Bennett DeLancey	235-2
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-37, 377-38, 377-39, 377-121

**Subsection 4.6 Preference for Alternatives and Route Designations that Favor Route Closure or Limitation to Reduce Impacts to Residents**

**Comment 4.6-1: General opposition to designation of routes as motorized/open based on 43 CFR 8342.1 (c)**

<b>Summary of Comments:</b>	
<p>These comments oppose designating routes as motorized for OHV usage based on the minimization criteria in 43 CFR 8342.1 (c). These comments generally cite one or more impacts covered under 43 CFR 8342.1 (c), including conflicts with the County OHV Ordinance, conflicts between off-road vehicle use and other recreation uses, compatibility of off-road vehicle use with existing conditions in populated areas, taking into account noise, safety, fire, and other factors. These comments do not provide specific locations where routes should be closed, nor do they identify specific text in the DSEIS that is deficient.</p>	
<b>Response to Comments:</b>	
<p>These are general comments that express a preference for route closure based on conflicts with other route uses and recreation uses, and compatibility of OHV use with existing conditions in populated areas. These issues were considered in the designation of all routes, using the process described in Section 2.1.4 of the DSEIS. However, these comments do not provide route-specific information. Where specific comments regarding the impact of a route to a specific resource have been made, the agency has reviewed the route designation and made revisions where appropriate. Based on the need to balance access and resource protection, it is not possible or appropriate to close all routes that are co-located with potentially affected resources.</p>	
<b>Index to Comments</b>	
Comment letter #3 is a form letter received from approximately 29 commenters	3-2, 3-6, 3-7
Jim and Anita Dobbs	21-1
Tom Sweetland	25-1
Stephanie J. Weigel	35-1, 35-2, 35-8, 35-9
Laurie Kaye and Curt Fisher	39-5
Cat Celebrezze	41-1
Ginger & Dean Cowan	47-1
Daniel G Burnett	63-1
Comment letter #111 is a form letter received from approximately 14 commenters	111-6
Sean Blau	114-3, 114-6, 114-9
Linda Doyle	118-3, 118-6, 118-7, 118-9
Robert Kaplan	119-4, 119-7, 119-8, 119-9
Jacob Forman	125-3, 125-6, 125-7
Matt Adrian and Kimberly Bagwill	145-2
Sarah Kennington and Steve Bardwell (co-signed by 32 Morongo Basin residents)	151-3
Morongo Basin Conservation Association	156-1, 156-8
Michael Cohen and Nancy Barton	160-2, 160-6, 160-7
Adrian Field, Blanca Martinez, Paul Pearson, Olive Toscani	166-2, 166-7, 166-8
Paul and Wendy Hadley	167-2, 167-3, 167-4, 167-5
Defenders of Wildlife and Sierra Club	176-26, 176-34

Chris Carraher, Eric Hamburg, Beth Sheffield, Ken Sitz, Teresa Sitz	178-2, 178-6, 178-7
Peggy Lee Kennedy	186-3, 186-7, 186-8
William Blau	189-3, 189-5, 189-9
Stephanie Weigel	210-4
Paul Hadley and Wendy Hadley	215-4
Margaret Adam	221-1, 221-2, 221-3, 221-7
Laraine Turk	234-4, 234-5, 234-6
Jean Doyle	292-1
Esther Shaw	334-1
Karen Tracy	343-1
Richard McDowell	350-1
Richard McDowell	351-1, 351-3, 351-7, 351-8
B. Beck Hampton	364-2, 364-3
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-112
Western San Bernardino County Landowner's Association	383-2, 383-6, 383-7, 383-10
Mary Lindsley	381-1
ORV Watch Kern County (TMA 4)	392-3, 392-5, 392-8, 392-9, 392-12
Neil Wierenga (Joshua Tree)	408-3
Mary Dellavalle	409-5
<b>Comment 4.6-2: Request routes that intersect or coincide with private property, County Service Area roads, or roads and highways used by licensed vehicles be designated as closed, or otherwise limited</b>	
<p><b>Summary of Comments:</b>            These comments generally request that BLM close, or limit to street-legal only, routes that intersect or coincide with private property, County Service Area roads, roads maintained and funded by residents, or roads and highways used by licensed vehicles. The rationale provided in the comments is to reduce trespass, erosion, and proliferation of routes, and to avoid conflicts with residents and accidents with vehicles. Some of the comments state that, if this project is designating motorized vehicle use on County roads, then CEQA review is required. Some of the comments request that the DSEIS cite County ordinances related to OHV use of county roads and on private property of others. Some comments point out that OHV use of County roads is prohibited, so designating a route for OHV use requires implementation of a staging area, otherwise OHV users will illegally use the County road to access the OHV route. Many of the comments specifically request that routes in residential areas be designated as open to "street-legal" vehicles only.</p>	

<b><i>Response to Comments:</i></b> BLM has worked with San Bernardino County and made necessary adjustment to designations related to County Service Area roads. In addition, BLM has worked with the counties within the planning area, and considered all public comments, in determining where street-legal sub-designations are appropriate to address user conflicts and impacts to residents. BLM does not make route designations on County roads, and CEQA analysis is not applicable to a Federal action entirely on Federal land.	
<b><i>Index to Comments</i></b>	
Comment letter #3 is a form letter received from approximately 29 commenters	3-1, 3-3, 3-9
Stephanie J. Weigel	35-3, 35-3, 35-11
Laurie Kaye and Curt Fisher	39-2, 39-8
Ginger & Dean Cowan	47-1
Comment letter #111 is a form letter received from approximately 14 commenters	111-3, 111-4
Sarah Kennington and Steve Bardwell	113-7, 113-8
Sean Blau	114-2, 114-5, 114-11
Jacob Forman	125-1, 125-3, 125-9
ORV Watch Kern County	132-1
Sarah Kennington and Steve Bardwell (co-signed by 32 Morongo Basin residents)	151-4
Morongo Basin Conservation Association	156-1, 156-4, 156-5, 156-8
Michael Cohen and Nancy Barton	160-1, 160-3, 160-9
Adrian Field, Blanca Martinez, Paul Pearson, Olive Toscani	166-1, 166-4, 166-13
Paul and Wendy Hadley	167-1
Defenders of Wildlife and Sierra Club	176-1
Chris Carraher, Eric Hamburg, Beth Sheffield, Ken Sitz, Teresa Sitz	178-1, 178-3, 178-12, 178-9
Peggy Lee Kennedy	186-72, 186-4, 186-10
William Blau	189-2, 189-5, 189-11
Paul Pearson	204-3
Margaret Adam	211-10
Julia Dole	212-14, 212-15
Donald Teschner	214-14, 214-15
Margaret Adam	221-7, 221-8
Laraine Turk	234-5, 234-6
Richard McDowell	351-2, 351-4, 351-10
Blake Baxter (TMA 3)	368-1
Center for Biological Diversity	379-34, 379-37
Western San Bernardino County Landowner's Association	383-1, 383-9
Jane Mc Rae (TMA 3)	388-1

	RL Pessa	389-2
	Brad Dunning (TMA 3)	390-1
	Diane Kuntz (TMA 3)	401-3
	San Bernardino County	407-2
<b>Comment 4.6-3: Request routes that are in rural communities be designated as closed or as street legal-only</b>		
<p><b>Summary of Comments:</b>                  The comments generally request that BLM present alternatives or designate routes to avoid rural communities, or to designate routes within rural communities as street legal-only. They also request that the DSEIS analyze the impact of the transportation network on modifying the character of rural communities. The comments do not provide specific locations, nor do they identify specific text in the DSEIS that is deficient.</p>		
<p><b>Response to Comments:</b>                  These are general comments that state a preference for closure of routes based only on their presence in rural areas. The DSEIS addresses impacts on rural communities in its sections on air quality (3.2), socioeconomics (3.5 and 4.5), and noise (3.12 and 4.12). Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Presence in rural areas, on its own, is not a criterion in 43 CFR 8342.1 and therefore was not directly used as a criterion in the WMRNP analysis. However, in cases where routes present in rural areas had led to identifiable user conflicts or resource impacts, and where the routes could be closed without unacceptable disruption to access needs, then these routes were closed. BLM has solicited input from the public regarding routes that may be causing user conflicts or resource impacts, including cases where these impacts are caused by routes in rural areas. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future. In some cases, access needs dictated a need for routes that are located in rural areas. Therefore, the presence of a route in rural areas, on its own, cannot be used to close routes.</p>		
<b>Index to Comments</b>		
	Comment letter #3 is a form letter received from approximately 29 commenters	3-3
	Stephanie J. Weigel	35-5
	Comment letter #111 is a form letter received from approximately 14 commenters	111-3
	Sean Blau	114-5
	Jacob Forman	125-3
	Sarah Kennington and Steve Bardwell (co-signed by 32 Morongo Basin residents)	151-7
	Michael Cohen and Nancy Barton	160-3
	Adrian Field, Blanca Martinez, Paul Pearson, Olive Toscani	166-4, 166-10
	Chris Carraher, Eric Hamburg, Beth Sheffield, Ken Sitz, Teresa Sitz	178-3, 178-9
	Peggy Lee Kennedy	186-4
	William Blau	189-5
	Gordon Zittel	199-5
	Teresa Sitz	203-10
	Stephanie Weigel	210-4
	Julia Dole	212-17
	Donald Teschner	214-17
	Margaret Adam	221-77, 221-8
	Laraine Turk	234-5

Sean Davison	344-1
Richard McDowell	351-4
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-40, 377-41, 377-106, 377-108

**Subsection 4.7 Preference for Alternatives and Route Designations that Enhance Access and Motorized Recreation**

<b>Comment 4.7-1: Support for Alternative 3 – Enhanced Access Alternative</b>	
<i>Summary of Comments:</i> These comments generally support selection of Alternative 3, or some form of an Enhanced or Pro-Recreation Alternative, based on the high demand and need for motorized access and recreation opportunities. The comments do not provide specific locations, nor do they identify specific text in the DSEIS that is deficient.	
<i>Response to Comments:</i> The comments in favor of selection of Alternative 3 are noted. These are general comments that express a preference for designating routes as motorized/open in order to enhance access and recreation opportunities. Access and recreation opportunities were considered in the designation of all routes, using the process described in Section 2.1.4 of the DSEIS. However, these comments do not provide route-specific information. Where specific comments regarding the need to provide access or recreation opportunities have been made, the agency has reviewed the route designation and made revisions where appropriate. Based on the need to balance access and resource protection, it is not possible or appropriate to designate as motorized/open all routes that enhance access or recreation.	
<i>Index to Comments</i>	
Comment letter #2 is a form letter received from approximately 120 commenters	2-2
Ian Hall	15-1
Sean P Rafferty	20-1
Ken Raleigh	27-1
Capital Trail Vehicle Association	54-2
Jim Wharff	128-1
Inyo County Board of Supervisors	130-1
Jim Thompson	134-1
Randy Banis	138-56
John Morley	141-1
David Aubuchon	144-1
Mark Tillman	146-1
John Krstenansky	149-1
Alan Chenworth	187-1
Alan Chenworth	225-1
Mathew Ryker	261-1
Michael Catone	272-1
Bruce and Gale Chitica	287-1
Richard Mueller	331-1
Eric Lindauer	340-1
Kyle Lanham	352-1
Mark Lanham	354-1
Stefanie Catone	355-1
Lisa Lanham	356-1

	Paul Hubbard	366-1
	Michael Hawkins	367-1
	David Buehn	373-1
	Stephen Oakes	386-1
	RL Pessa	389-1, 389-3
<b>Comment 4.7-2: General opposition to designating routes as closed</b>		
<p><b>Summary of Comments:</b>                  These comments generally request that BLM not close routes. These comments state that motorized vehicle use of routes does not impact resources, and that the availability of motorized/open routes has been declining, reducing opportunities for motorized recreation. Some comments point out that closure of areas and routes results in concentrating use in other areas, resulting in increased impacts to resources.</p>		
<p><b>Response to Comments:</b>                  The comments in favor of designating routes as motorized/open are noted. These are general comments that express a preference for designating routes as motorized/open in order to enhance access and recreation opportunities. Access and recreation opportunities were considered in the designation of all routes, using the process described in Section 2.1.4 of the DSEIS. However, these comments do not provide route-specific information. Where specific comments regarding the need to provide access or recreation opportunities have been made, the agency has reviewed the route designation and made revisions where appropriate.                  Based on the need to balance access and resource protection, it is not possible or appropriate to designate as motorized/open all routes that enhance access or recreation.</p>		
<b>Index to Comments</b>		
	Comment letter #1 is a form letter received from approximately 94 commenters	1-1
	Comment letter #2 is a form letter received from approximately 120 commenters	2-1
	Mike and Marilyn Nitz	9-1
	Kevin Ward	10-1
	Joe Bowlin	12-1
	Brian Mussetter	16-1
	Jim Ober	17-1
	David M Jensen	23-1
	Jaudon Allen	26-1
	John Hunter	28-1
	David Carrera	31-3
	James E. Johnson	34-1
	Unsigned	38-1
	Tim Huckabay	45-1
	Gatzke Dillon and Ballance, LLP	115-3
	Alan Chenworth	225-1
	Robert Carey	353-1
	Jim Ober	358-1
	Mark Bullock	359-1
	Richard Combs	362-1
	Jim Beauchamp	365-1
	Mark W Miller	370-1
	California 4 Wheel Drive Association	406-3, 406-11
<b>Comment 4.7-3: General opposition to Alternative 4 as being too restrictive</b>		

<b>Summary of Comments:</b>	
These comments generally oppose selection of Alternative 4 because it closes too many routes, and the commenter prefers a larger motorized route network.	
<b>Response to Comments:</b>	
<b>Index to Comments</b>	
Kevin Ward	10-2
Christopher Ford	18-1
Ross Termin	19-1
Darren Bart	36-1, 36-2
Ken Raleigh	37-1
Comment letter #110 is a form letter received from approximately 48 commenters	110-1, 110-2, 110-3
Lorraine Raleigh	190-1
Christopher Ford	357-1
Darren Bart	361-1
Town of Apple Valley	382-1, 382-7
<b>Comment 4.7-4: Closure of routes does not conform to regulations and court rulings</b>	
<b>Summary of Comments:</b>	
These comments generally oppose closure of routes by stating that closures violate access to authorized uses of public land, which is guaranteed under a variety of laws, regulations, and Court rulings. The comments cite the 1872 Mining Law, Multiple Surface Use Act, National Minerals and Mining Policy, FLPMA, United States vs New Mexico 1978, and Shoemaker vs United States Department of the Interior.	
<b>Response to Comments:</b>	
Public access to Federal lands is subject to FLPMA and 43 CFR 8342.1 regulations. If access to a mining claim or mining operation is needed (or for any authorized use), such access can be requested; the BLM would evaluate the request and allow access if appropriate.	
<b>Index to Comments</b>	
Gary Goodson	49-1, 49-2, 49-3, 49-4, 49-6, 49-7, 49-8, 49-9, 49-10, 49-11, 49-14
Capital Trail Vehicle Association	54-8, 54-12, 54-15
<b>Comment 4.7-5: Support for emphasizing mitigation measures, as opposed to route closures and limitations, to reduce user conflicts and resource impacts</b>	
<b>Summary of Comments:</b>	
These comments generally request that BLM emphasize mitigation measures, as opposed to route closures and limitations, to reduce user conflicts and resource impacts. These are general comments that express a preference for limiting use of routes, enforcing existing limitations, use fees, and education, instead of closing routes in order to achieve resource protection. The comments do not provide specific locations, nor do they identify specific text in the DSEIS that is deficient.	

	<p><b>Response to Comments:</b>                  The comments in favor of emphasizing mitigation measures, as opposed to route closure, are noted. Both route closure and minimization, including limitation on motorized uses, were considered in the designation of all routes, using the process described in Section 2.1.4 of the DSEIS. However, these comments do not provide route-specific information. Where specific comments regarding the potential for minimization, as opposed to closure, have been made, the agency has reviewed the route designation and made revisions where appropriate.                  Based on the need to balance access and resource protection, it is not possible or appropriate to achieve all resource protection objectives simply through mitigation, and some level of closure is appropriate.</p>
	<p><b>Index to Comments</b>                  California 4 Wheel Drive Association   406-12</p>
<p><b>Comment 4.7-6: Support for use of maps, signs, and published information to communicate access information</b></p>	
	<p><b>Summary of Comments:</b>                  These comments generally support BLM’s use of maps, signs, and published information to communicate access and resource protection information to the public, as opposed to route closure, in order to protect resources. The comments do not provide specific locations, nor do they identify specific text in the DSEIS that is deficient.</p>
	<p><b>Response to Comments:</b>                  The comments supporting the use of maps, signs, kiosks, and published information to communicate route information to users are noted. These are general comments that do not provide route-specific information. Where specific comments regarding maps, signs, and additional published information have been provided, the agency considered this information in the development and implementation of the TMPs.</p>
	<p><b>Index to Comments</b>                  ORV Watch Kern County   132-6</p>
<p><b>Comment 4.7-7: Maintain administrative access for research</b></p>	
	<p><b>Summary of Comments:</b>                  These comments request that specific routes, or routes in specific areas, be made accessible for specific research activities.</p>
	<p><b>Response to Comments:</b>                  For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
	<p><b>Index to Comments</b>                  Katharine Loughney   170-1                  Tara Smiley   171-1                  Catherine Badgley   172-1                  Society of Vertebrate Paleontology   395-1</p>
<p><b>Comment 4.7-8: Request to designate routes as motorized/open based on need to access authorized land uses</b></p>	
	<p><b>Summary of Comments:</b>                  These comments request that specific routes, or routes in specific areas, are left accessible for authorized land uses.</p>

<b><i>Response to Comments:</i></b>	
Where individual routes or areas are cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.	
<b><i>Index to Comments</i></b>	
Gary Goodson	49-14
Katharine Loughney	170-1
Tara Smiley	171-1
Catherine Badgley	172-1
Irene Fisher	206-4, 206-8
Alan Chenworth	225-1
Brad Covert	374-1
<b>Comment 4.7-9: Maintain access for rock and gem collecting</b>	
<b><i>Summary of Comments:</i></b>	
These comments request that routes be opened to maintain access for rock and gem collecting.	
<b><i>Response to Comments:</i></b>	
Where individual routes or areas are cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.	
<b><i>Index to Comments</i></b>	
Ruth Hidalgo	140-2
Lisbet Thoresen, Kim Erb, Jim Parrish, and Andrew Hoekstra	165-2, 165-3
Kenneth Powers	224-1
Karl Zeller	226-1
Kerry Kozelka	231-1
Fred Ott	232-1
<b>Comment 4.7-10: Request that dead-end trails be connected by designating the intervening segments as motorized/open</b>	
<b><i>Summary of Comments:</i></b>	
These comments generally request that BLM avoid dead-end routes by designating as motorized/open the intervening segments. Some comments request that these be designated to improve connectivity of the network. Others cite resource impacts that can occur by motorized vehicles getting trapped in dead-end areas. The comments do not provide specific locations, nor do they identify specific text in the DSEIS that is deficient.	
<b><i>Response to Comments:</i></b>	
The comments in favor of designating routes as motorized/open in order to connect areas or routes are noted. These are general comments that express a preference for designating routes as motorized/open in order to increase the connectivity of the network. Connectivity of the network was considered in the designation of all routes, using the process described in Section 2.1.4 of the DSEIS. However, these comments do not provide route-specific information. Where specific comments regarding the need to increase connectivity have been made, the agency has reviewed the route designation and made revisions where appropriate.	
<b><i>Index to Comments</i></b>	
California Department of Parks and Recreation	161-2
<b>Comment 4.7-11: Request that BLM continue to provide access to paleontology sites</b>	

<b>Summary of Comments:</b>	
These comments generally request that BLM designate routes that provide access to paleontology sites as motorized/open, or that the DSEIS specifically discuss how the effect on fossil inventory and management.	
<b>Response to Comments:</b>	
Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Access to paleontology sites, on its own, is not a criterion in 43 CFR 8342.1 and therefore was not directly used as a criterion in the WMRNP analysis. BLM has solicited input from the public regarding access needs, including access to paleontology sites. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future.	
<b>Index to Comments</b>	
Katharine Loughney	170-1
Tara Smiley	171-1
Catherine Badgley	172-1
<b>Comment 4.7-12: Request that routes once authorized remain designated as motorized</b>	
<b>Summary of Comments:</b>	
These comments request that routes, such as the Barstow to Vegas Course, that were once authorized not be changed to transportation linear disturbances.	
<b>Response to Comments:</b>	
The availability of the Barstow-to-Vegas race course for competitive events would be reconsidered and modified in light of the current on-the-ground situation and the loss of acreage from the Johnson Valley OHV Open Area, and in reconsideration of all 43 CFR 8342.1 minimization criteria.	
<b>Index to Comments</b>	
Randy Banis	138-3
<b>Comment 4.7-13: Opposed to restrictions on dispersed camping</b>	
<b>Summary of Comments:</b>	
These comments generally oppose restrictions on camping. The comments do not provide specific locations, nor do they identify specific text in the DSEIS that is deficient.	
<b>Response to Comments:</b>	
The WMRNP does not place any restrictions on dispersed camping. The analysis does consider restrictions on motorized vehicle access, based on access needs, user conflicts and resource impacts, as specified in 43 CFR 8342.1, and those restrictions may limit the use of vehicles to access desired camping sites. The WMRNP does designate camping areas, and BLM has solicited and incorporated input from the public regarding access to specific sites for camping. Vehicle-based camping along routes is considered for further restriction to reduce impacts to resources in accordance with 43 CFR 8342.1.	
<b>Index to Comments</b>	
Gatzke Dillon and Ballance, LLP	115-4
Ruth Hidalgo	140-1
California 4 Wheel Drive Association	406-9
<b>Comment 4.7-14: Opposed to designation of transportation linear disturbances in OHV Open Areas</b>	
<b>Summary of Comments:</b>	
These comments note that OHV Open Areas do not restrict OHVs to routes, and therefore there should be no routes designated as transportation linear disturbances within these areas.	
<b>Response to Comments:</b>	
OHV Areas are excluded from route designation.	
<b>Index to Comments</b>	

	Randy Banis	138-3
<b>Comment 4.7-15: Support for Alternative 4</b>		
	<b>Summary of Comments:</b> These comments generally support selection of Alternative 4. The comments do not provide specific locations, nor do they identify specific text in the DSEIS that is deficient.	
	<b>Response to Comments:</b> Comments that offered general support for Alternative 4, generally did provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS.	
	<b>Index to Comments</b>	
	Sarah Kennington and Steve Bardwell (co-signed by 32 Morongo Basin residents)	151-12
	Lorraine Raleigh	190-1
	Bruce Whitcher, California Off-Road Vehicle Association	399-3
	Irene Fisher	206-2
	Brent Banta	273-1
	Paul Clifford	337-1
	Ron Banuk	363-1
	Bruce Bodenhofer	375-1
	Donald Ison	376-1
	Town of Apple Valley	382-7
	California Off-Road Vehicle Association	399-3
	US EPA, Region IX	403-1
	California 4 Wheel Drive Association	406-4, 406-13
	Blue Ribbon Coalition	410-1, 410-2
<b>Comment 4.7-16: Support for Alternative 4 in Middle Knob</b>		
	<b>Summary of Comments:</b> These comments provide general support for Alternative 4 in the Middle Knob area.	
	<b>Response to Comments:</b> The route designation in Alternative 5 within the Middle Knob area incorporates, where appropriate, the coordination with interested parties and stakeholders.	
	<b>Index to Comments</b>	
	Marc Eldridge	122-2
	Defenders of Wildlife and Sierra Club	176-94
	Christopher Ford	357-1
<b>Comment 4.7-17: Request to address conflicts on Pacific Crest Trail</b>		
	<b>Summary of Comments:</b> These comments request that conflicts between hikers and motorized vehicles on the Pacific Crest Trail be addressed.	
	<b>Response to Comments:</b> Where BLM has identified conflicts on the Pacific Crest Trail between hikers and vehicles, BLM has made adjustments to route designations to reduce or avoid such conflicts.	
	<b>Index to Comments</b>	
	Pacific Crest Trail Association	135-5
<b>Comment 4.7-18: Request designation of land sailing areas</b>		
	<b>Summary of Comments:</b> These comments request that areas be designated specifically for land sailing.	

<b><i>Response to Comments:</i></b> Under Alternative 5, Koehn Lakebed would remain “Closed to motor vehicle access, except for approved routes of travel or as authorized by Land Use Permit or Special Recreation Permit”, and Cuddeback and Coyote lakebeds would be designated as “open” to motorized and other recreational use consistent with the LUPA, and subject to specific minimization measures. Chisholm Trail lakebed (south of Calico Ghost Town) would be closed to all types of use.	
<b><i>Index to Comments</i></b>	
Carl Masse	338-1
C Shields	348-1
Lester Robertson	349-1
Nord Embroden	394-1, 394-5
Carl Eberly	397-1, 397-2, 397-3
<b>Comment 4.7-19: Opposition to closure of Small Tracts Act routes</b>	
<b><i>Summary of Comments:</i></b> These comments oppose closure of routes, or designation of street legal-only, on Small Tract Act routes.	
<b><i>Response to Comments:</i></b> Small Tract Act parcels were reviewed and routes were designated as motorized and/or street legal only that are adjacent to these parcels, depending on resource conflicts, public comments and subject to specific minimization criteria.	
<b><i>Index to Comments</i></b>	
Michael Hawkins	223-1
Michael Hawkins	367-2

**Subsection 4.8 Recommendations for Implementation and Mitigation**

<b>Comment 4.8-1: Specific recommendations for signing</b>	
<b><i>Summary of Comments:</i></b> These comments make specific recommendations regarding the manner in which trails and routes should be signed.	
<b><i>Response to Comments:</i></b> Where specific comments regarding signing methods have been provided, the agency considered this information in the development and implementation of the TMPs.	
<b><i>Index to Comments</i></b>	
Defenders of Wildlife and Sierra Club	176-22, 176-23, 176-27, 176-47
B. Beck Hampton	364-1, 364-4
U.S. Marine Corps Installations West	183-8
Desert Tortoise Council	380-201
Desert Tortoise Council	412-60, 412-62
<b>Comment 4.8-2: Recommendations for specific mitigation measures to be implemented to address resource impacts</b>	
<b><i>Summary of Comments:</i></b> These comments provide specific recommendations for mitigation measures to be implemented to reduce resource impacts. Proposed mitigation measures include limiting access in desert tortoise conservation areas to street-legal vehicles, implementing speed limits, implementing systematic monitoring to address unanticipated impacts, maintain berms to avoid impacts to tortoise, fencing of areas to protect wildlife, and grazing buffers near water resources.	

<b><i>Response to Comments:</i></b> BLM uses a variety of mitigation measures to protect resources. Other mitigation measures mentioned in the comments are used where appropriate. Livestock grazing is an authorized use under the CDCA Plan as amended by the 2006 West Mojave Plan and the 2016 DRECP. All of the current grazing leases include the grazing strategies contained in the 2006 WEMO as terms and conditions (mitigation measures) to those grazing leases which have FWS concurrence.	
<b><i>Index to Comments</i></b>	
Comment letter #6 is a form letter received from approximately 361 commenters	66-2
Defenders of Wildlife and Sierra Club	176-25, 176-44, 176-48
Alan Solomon	248-2, 248-3
Ginabella Mallari	252-1
Gary Bailey	268-2
Jackie Pomies	274-2
Jessica Carr	278-2, 278-3
Helen Wagenvoord	284-2, 284-3
Richard Blain	288-2
John Nichols	290-2, 290-3
Kent Karlsson	303-1, 303-2, 303-3
Todd W. Barnes	309-1
Shelley Burkhart	310-1, 310-2, 310-3
Dita Skalic	313-2, 313-3
Kevin Frost	319-1
MaryAnn Frost	321-1
Roger Hollander	329-2, 329-3
W. Peter Vanderlaag	330-3
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-93, 377-118
Desert Tortoise Council	380-65, 380-67, 380-179
Nord Embroden	394-2, 394-3, 394-4, 394-5
California Off-Road Vehicle Association	399-1, 399-4
Desert Tortoise Council	412-14, 412-82, 412-133, 412-134, 412-152, 412-158
<b>Comment 4.8-3: Request that BLM expedite permitting procedures</b>	
<b><i>Summary of Comments:</i></b> These comments request that BLM include language regarding implementation that expedites permitting procedures for land use activities on public land.	
<b><i>Response to Comments:</i></b> This is outside of the scope of the WMRNP.	
<b><i>Index to Comments</i></b>	
Inyo County Board of Supervisors	130-1

**Subsection 4.9 Comments on the Sufficiency of Analysis of the Route Network Alternatives**

<b>Comment 4.9-1: Specific comments regarding Sub-region and TMA boundaries</b>	
<i>Summary of Comments:</i> These comments state disagreement with how specific sub-region and TMA boundaries were drawn. The specific area of interest is Homestead Valley, which was split into three different TMAs.	
<i>Response to Comments:</i> The major transportation arteries and proximity to Johnson Valley OHV area were considered in determining the boundaries of the TMAs around Homestead Valley. BLM will not be adjusting the boundaries of the TMAs, but will work with the Homestead Valley Community Council to address any issues.	
<i>Index to Comments</i>	
Desert Tortoise Council	412-40
<b>Comment 4.9-2: The discussions of OHV use, trends, and impacts in the DSEIS are biased in favor of pro-OHV groups.</b>	
<i>Summary of Comments:</i> These comments state that the discussions of OHV use, trends, and impacts in the DSEIS are biased in favor of a pro-OHV Plan. Some of the comments request that source information for statements about the long-term reduction in OHV access be provided.	
<i>Response to Comments:</i> The DSEIS discusses recreation as one of the many multiple uses allowed on BLM lands. The purpose of this section is to provide the existing conditions regarding recreation, including information regarding past and expected future trends in those conditions, to evaluate the impact of the route network alternatives on those conditions. It is not the purpose of this section to evaluate the impact of OHV recreation on all other resources and land uses within the planning area. Those evaluations are provided throughout the rest of the DSEIS.	
<i>Index to Comments</i>	
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-2
Desert Tortoise Council	380-110
<b>Comment 4.9-3: DSEIS does not provide a detailed description of how the routes were analyzed, and document how each route was individually evaluated against the minimization criteria in 43 CFR 8342.1</b>	
<i>Summary of Comments:</i> These comments state that the DSEIS does not sufficiently describe how the GIS analysis was done, or demonstrate how each route was individually evaluated against each of the criteria in 43 CFR 8342.1.	
<i>Response to Comments:</i> Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. The process used to designate routes is described in Section 2.1.4 of the DSEIS. Please see the text starting on page 2-18 of the Final Supplemental EIS for how the GIS analysis was conducted and how route designation alternatives were developed.	
<i>Index to Comments</i>	
Comment letter #4 is a form letter received from approximately 3,520 commenters	64-3
Defenders of Wildlife and Sierra Club	176-8, 176-11, 176-12, 176-24, 176-25, 176-50

Comment letter #195 is a form letter received from 6 commenters	195-1
Julia Dole	212-18
Donald Teschner	214-18
Karl Zeller	226-3
Chris Lish	333-3
F Hammer	335-3
Roman LoBianco	336-3
Kathleen McConn	339-3
Katie Fagan	341-3
Stewart Wilber	342-3
Mlou Christ	345-2
Janet Fiore	346-2
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-10, 377-21, 377-22, 377-26, 377-68, 377-372, 377-373
Center for Biological Diversity	379-12, 379-90
Desert Tortoise Council	380-60
California 4 Wheel Drive Association	406-18
Western Watersheds Project	411-9, 411-10
<b>Comment 4.9-4: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to the minimization criteria in 43 CFR 8342.1</b>	
<b>Summary of Comments:</b> These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1, or to the term “unnecessary and undue degradation” is inadequate, or is not provided at all, in the DSEIS. These comments typically do not provide a list of specific resources that are impacted, or do not cite a specific subsection of 43 CFR 8342.1.	
<b>Response to Comments:</b> These are general comments that state that the analysis is inadequate, but do not provide route or resource-specific information. Where specific comments regarding the analysis of a resource has been made, the agency has reviewed the analysis and made revisions where appropriate.	
<b>Index to Comments</b>	
Defenders of Wildlife and Sierra Club	176-5
Comment letter #195 is a form letter received from 6 commenters	195-1, 195-2
Comment letter #196 is a form letter received from 5 commenters	196-4
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-56, 377-57, 377-38
Center for Biological Diversity	379-10, 379-11, 379-39, 379-41, 379-86, 379-93
Desert Tortoise Council	412-51, 412-83
<b>Comment 4.9-5: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to all required Executive Orders</b>	
<b>Summary of Comments:</b> These comments request that the SEIS specifically list and address compliance with a list of Executive Orders.	
<b>Response to Comments:</b> Executive Orders No. 11644, 11989, and 13195 were employed throughout the planning process.	
<b>Index to Comments</b>	

	Defenders of Wildlife and Sierra Club	176-15, 176-16
	Desert Tortoise Council	380-44
<b>Comment 4.9-6: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (a) – Air Quality</b>		
	<b>Summary of Comments:</b> These comments state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (a) is inadequate, is not provided at all in the DSEIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of air quality. The comments address the impacts of dust emissions on residents, and on wildlife and vegetation, BLM’s monitoring or air quality, and plans to protect air quality.	
	<b>Response to Comments:</b> Tables 2.3-4 and 2.3-7, and Section 4.2.1.1 of the DSEIS, describe how proximity to sensitive receptors who could be affected by fugitive dust emissions was included in the evaluation of the route network alternatives. Section 4.4.1.2 acknowledges that fugitive dust deposition can adversely impact vegetation, and Section 4.4.2.2 acknowledges that fugitive dust can adversely impact wildlife. Alternative 5 incorporates additional avoidance and minimization measures, such as designating some routes as street-legal only.	
	<b>Index to Comments</b>	
	Morongo Basin Conservation Association	156-3
	Paul Pearson	204-2
	Paul Hadley and Wendy Hadley	215-2
	The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-6, 377-97, 377-98, 377-375377-376, 377-377, 377-378, 377-379, 377-380, 377-381, 377-382, 377-383
	Center for Biological Diversity	379-46, 379-48, 379-49, 379-50, 379-51, 379-52, 379-53, 379-54, 379-55
	Desert Tortoise Council	380-5, 380-120, 380-121, 380-122, 380-123, 380-172, 380-174, 380-175, 380-176
<b>Comment 4.9-7: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (a) – Climate Change</b>		
	<b>Summary of Comments:</b> These comments state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (a) is inadequate, is not provided at all in the DSEIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of climate change.	

<b><i>Response to Comments:</i></b> A 35 page air quality analysis that examines the current state of air quality in the West Mojave Planning Area was added to the appendix The technical report discusses and analyzes air quality conformance for each of the alternatives contained in the Final SEIS. An analysis of impacts to GHGs and Carbon Sequestration from the WMRNP, by alternative is contained in Chapter 4 under Section 4.2.2.2 and in Table 4.2-5.	
<b><i>Index to Comments</i></b>	
Defenders of Wildlife and Sierra Club	176-52, 176-53
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-61, 377-62, 377-63
Center for Biological Diversity	379-56, 379-57, 379-58
Desert Tortoise Council	412-28, 412-29, 412-98, 412-99

**Comment 4.9-8: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (a) – Cultural Resources and Tribal Issues**

<b><i>Summary of Comments:</i></b> These comments state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (a) is inadequate, is not provided at all in the DSEIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of cultural resources and tribal issues. The comments address the amount of cultural resources data available, disagree that compliance with 43 CFR 8342.1 can be accomplished by consultation through SHPO and SCHP, and request that the DSEIS provide an analysis of environmental justice impacts based on a breakdown of ethnographic origin.	
<b><i>Response to Comments:</i></b> BLM acquired and evaluated additional GIS layers related to potential affected cultural resources, and incorporated that additional information into the revised route network in Alternative 5. Route designations take into consideration the designation criteria for cultural resources. Surgical designation changes were considered with regards to cultural resources to incorporate route specific public comments where appropriate.	
<b><i>Index to Comments</i></b>	
Paul Hadley and Wendy Hadley	215-2
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-6, 377-99, 377-100, 377-101, 377-102, 377-103, 377-104
Colorado River Indian Tribes	384-1, 384-3, 384-4, 384-6, 384-7, 384-8, 384-9, 384-10, 384-11, 384-12

**Comment 4.9-9: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (a) – Soils**

<b>Summary of Comments:</b>	
<p>These comments state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (a) is inadequate, is not provided at all in the DSEIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of soil resources. The comments contend that the DSEIS does not provide an inventory of erodible soils, the use of slope to evaluate the potential for soil erosion has no basis, and that the DSEIS focuses only on erosion instead of compaction and loss of soil function.</p>	
<b>Response to Comments:</b>	
<p>BLM acquired and evaluated additional GIS layers related to potential soil erosion, and incorporated that additional information into the revised route network in Alternative 5. Route designations take into consideration the designation criteria for soils. Surgical designation changes were considered with regards to soils to incorporate route specific public comments where appropriate.</p>	
<b>Index to Comments</b>	
Sarah Kennington and Steve Bardwell	113-6
Comment letter #195 is a form letter received from 6 commenters	195-3
Paul Hadley and Wendy Hadley	215-2
Center for Biological Diversity	379-45
Desert Tortoise Council	380-177, 380-180, 380-182
Desert Tortoise Council	412-30
<b>Comment 4.9-10: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (a) – Lands With Wilderness Characteristics</b>	
<b>Summary of Comments:</b>	
<p>These comments state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (a) is inadequate, is not provided at all in the DSEIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of impacts to lands with wilderness characteristics.</p>	
<b>Response to Comments:</b>	
<p>Route designations take into consideration the designation criteria for lands managed for wilderness characteristics. Surgical designation changes were considered with regards to lands managed for wilderness characteristics to incorporate route specific public comments where appropriate.</p>	
<b>Index to Comments</b>	
California Native Plant Society	179-8
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-95, 377-96, 377-374
Center for Biological Diversity	379-16
Desert Tortoise Council	412-28
<b>Comment 4.9-11: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (a) – Water, Seeps, and Springs</b>	

<b>Summary of Comments:</b>	
<p>These comments state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (a) is inadequate, is not provided at all in the DSEIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of surface water, seeps, springs, and riparian areas. The comments contend that the DSEIS does not analyze impacts to springs and seeps, that it does not evaluate compliance of the WMRNP with state water regulations, and that it does not evaluate hydrologic changes that could lead to flooding.</p>	
<b>Response to Comments:</b>	
<p>Surface water impacts are discussed throughout Section 4.3.2 Water Resources. Impacts to springs are discussed in Sections 4.3.2 Water Resources and 4.3.3 Riparian Areas. Seeps are discussed in the Section 4.3.3 Riparian Areas in the discussion of PAs, specifically PA VII under each alternative. Seeps are also discussed in Section 4.4.1 Vegetation in the table for each alternative describing acreage and mileage of routes within identified vegetation communities. BLM acquired and evaluated GIS layers related to water, seep and springs, and incorporated that information into the revised route network in Alternative 5. Route designations take into consideration the designation criteria for water, seep and springs. Surgical designation changes were considered with regards to these resources to incorporate route specific public comments where appropriate.</p>	
<b>Index to Comments</b>	
Defenders of Wildlife and Sierra Club	176-49, 176-50, 176-51, 176-52, 176-71
Comment letter #195 is a form letter received from 6 commenters	195-3
Center for Biological Diversity	379-92
Mary Dellavalle	409-2
<b>Comment 4.9-12: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (a) – Vegetation</b>	
<b>Summary of Comments:</b>	
<p>These comments state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (a) is inadequate, is not provided at all in the DSEIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of vegetation. The comments contend that the DSEIS does not analyze impacts to Unusual Plant Assemblages (UPAs), specific species (desert cymopterus and Sanicle cymopterus), and the effects on the WMRNP on invasive plants. Some comments request that site-specific botanical surveys be conducted in areas where OHV routes would be designated with respect to the current land use plan and proposed route network.</p>	

<b>Response to Comments:</b>	
Desert cymopterus and Ripley’s cymopterus ( <i>Cymopterus ripleyi</i> var. <i>saniculoides</i> ) are discussed in Section 4.4.1 Vegetation in the table for each alternative describing acreage and mileage of routes within identified vegetation communities. UPAs are discussed in section 4.3.3 Riparian Areas and throughout section 4.4.1 Vegetation Resources. Invasive species are discussed throughout Section 4.4.1 Vegetation. BLM is required to consider the best available data when conducting the NEPA analysis and there is no requirement for BLM to survey each individual species in order to complete NEPA analysis. BLM acquired and evaluated GIS layers related to potential impacts to vegetation, and incorporated that information into the revised route network in Alternative 5. Route designations take into consideration the designation criteria for vegetation resources. Surgical designation changes were considered with regards to vegetation resources to incorporate route specific public comments where appropriate. BLM determined that The WMRNP is not authorizing new disturbance to the planning area. No direct impacts are anticipated to plants or habitats, because only routes that have existing disturbance are legally permissible to use. There could be indirect impacts if unauthorized use occurs. In addition, camping, parking and stopping are also only authorized in areas with existing disturbance.	
<b>Index to Comments</b>	
Desert Tortoise Preserve Committee	117-10
Defenders of Wildlife and Sierra Club	176-49, 176-50, 176-71, 176-73
California Native Plant Society	179-2, 179-3, 179-4, 179-5, 179-6, 179-7, 179-8, 179-9, 179-17
California Native Plant Society	179-17
Comment letter #195 is a form letter received from 6 commenters	195-3
Margaret Adam	211-2
Center for Biological Diversity	379-76, 379-77, 379-78, 379-79
Desert Tortoise Council	380-6, 380-185
Desert Tortoise Council	412-31
<b>Comment 4.9-13: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (b) – Wildlife Linkages</b>	
<b>Summary of Comments:</b>	
These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (b) is inadequate, is not provided at all in the DSEIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments request that the analysis address <i>A Linkage Design for the Joshua Tree-Twenty-nine Palms Connection</i> , in evaluating the impact of routes on wildlife. BLM acquired and evaluated GIS layers related to potential impacts to wildlife linkages, and incorporated that information into the revised route network in Alternative 5. Route designations take into consideration the designation criteria for wildlife linkages. Surgical designation changes were considered with regards to wildlife linkages to incorporate route specific public comments where appropriate.	
<b>Response to Comments:</b>	
BLM has acquired and considered the referenced document.	
<b>Index to Comments</b>	
Morongo Basin Conservation Association	156-2
Defenders of Wildlife and Sierra Club	176-52
Doria Talley	180-2

	Desert Tortoise Council	380-111, 380-162
	Desert Tortoise Council	412-32
<b>Comment 4.9-14: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (b) – Desert Tortoise</b>		
<p><b>Summary of Comments:</b>                  These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (b) is inadequate, is not provided at all in the DSEIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of impacts to the desert tortoise. The comments provide additional sources of data that were not considered in the DSEIS, and comment on additional source of impacts, such as habitat fragmentation, which they contend were not evaluates in the DSEIS. Some comments request that site-specific wildlife surveys be conducted in areas where OHV routes would be designated.</p>		
<p><b>Response to Comments:</b>                  Impacts to the desert tortoise are discussed throughout Section 4.4.2 Wildlife Resources and specifically on pages 4.4-47-50 with mitigation measures listed on page 4.4-58. Habitat fragmentation impacts are discussed throughout section 4.4.1.2. BLM is required to consider the best available data when conducting the NEPA analysis and there is no requirement for BLM to survey each individual species in order to complete NEPA analysis. BLM acquired and evaluated GIS layers related to potential impacts to desert tortoise, and incorporated that information into the revised route network in Alternative 5. Route designations take into consideration the designation criteria for desert tortoise. Surgical designation changes were considered with regards to desert tortoise to incorporate route specific public comments where appropriate.</p>		
<b>Index to Comments</b>		
	Desert Tortoise Preserve Committee	117-1, 117-2, 117-3, 117-4, 117-5, 117-6, 117-7, 117-9, 117-14
	Defenders of Wildlife and Sierra Club	176-37, 176-39
	Paul Hadley and Wendy Hadley	215-2
	Center for Biological Diversity	379-9, 379-43, 379-47, 379-59

	Desert Tortoise Council	380-3, 380-4, 380-5, 380-8, 380-19, 380-20, 380-21, 380-22, 380-24, 380-32, 380-33, 380-34, 380-35, 380-36, 380-37, 380-38, 380-39, 380-40, 380-42, 380-43, 380-46, 380-51, 380-52, 380-53, 380-56, 380-57, 380-58, 380-59, 380-63, 380-66, 380-70, 380-81, 380-88, 380-89, 380-90, 380-99, 380-112, 380-116, 380-119, 380-132, 380-133, 380-143, 380-147, 380-173, 380-184, 380-210
	Desert Tortoise Council	412-1, 412-2, 412-5, 412-6, 412-7, 412-11, 412-19, 412-20, 412-33, 412-34, 412-41, 412-42, 412-78, 412-80, 412-81, 412-141
<p><b>Comment 4.9-15: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (b) – Mohave Ground Squirrel</b></p>		
<p><b><i>Summary of Comments:</i></b>        These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (b) is inadequate, is not provided at all in the DSEIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of impacts to Mohave ground squirrel. Some comments request that site-specific wildlife surveys be conducted in areas where OHV routes would be designated.</p> <p><b><i>Response to Comments:</i></b>        Impacts to the Mohave ground squirrel are discussed throughout Section 4.4.2 Wildlife Resources and specifically on pages 4.4-42. BLM is required to consider the best available data when conducting the NEPA analysis and there is no requirement for BLM to survey each individual species in order to complete NEPA analysis. BLM acquired and evaluated GIS layers related to potential impacts to Mohave ground squirrel, and incorporated that information into the revised route network in Alternative 5. Route designations take into consideration the designation criteria for important Mohave ground squirrel areas. Surgical designation changes were considered with regards to Mohave ground squirrel to incorporate route specific public comments where appropriate.</p>		

<b><i>Index to Comments</i></b>	
Defenders of Wildlife and Sierra Club	176-40
Center for Biological Diversity	379-60
Western Watersheds Project	411-18
Desert Tortoise Council	412-73, 412-74
<b>Comment 4.9-16: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (b) – Mojave Fringe-Toed Lizard</b>	
<b><i>Summary of Comments:</i></b> These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (b) is inadequate, is not provided at all in the DSEIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of impacts to Mojave fringe-toed lizard. Some comments request that site-specific wildlife surveys be conducted in areas where OHV routes would be designated.	
<b><i>Response to Comments:</i></b> Impacts to the Mojave fringe-toed lizard are discussed throughout Section 4.4.2 Wildlife Resources and specifically on page 4.4-41. BLM is required to consider the best available data when conducting the NEPA analysis and there is no requirement for BLM to survey each individual species in order to complete NEPA analysis. Section 3.4.3.2.3 discusses how information regarding Mojave fringe-toed lizard was updated with information from the DRECP Baseline Biology Report, and the results of surveys conducted specifically to support the WMRNP. BLM acquired and evaluated GIS layers related to potential impacts to Mojave fringe-toed lizard, and incorporated that information into the revised route network in Alternative 5. Route designations take into consideration the designation criteria for important Mojave fringe-toed lizard areas. Surgical designation changes were considered with regards to Mojave fringe-toed lizard to incorporate route specific public comments where appropriate.	
<b><i>Index to Comments</i></b>	
Defenders of Wildlife and Sierra Club	176-42, 176-65
Center for Biological Diversity	379-61, 379-62, 379-63, 379-64, 379-65, 379-66
<b>Comment 4.9-17: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (b) – Avian Species</b>	
<b><i>Summary of Comments:</i></b> These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (b) is inadequate, is not provided at all in the DSEIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. Some comments request that site-specific wildlife surveys be conducted in areas where OHV routes would be designated.	
<b><i>Response to Comments:</i></b> Impacts to the avian species, including burrowing owls, are discussed throughout Section 4.4.2 Wildlife Resources and specifically on pages 4.4-43. BLM is required to consider the best available data when conducting the NEPA analysis and there is no requirement for BLM to survey each individual species in order to complete NEPA analysis. BLM acquired and evaluated GIS layers related to potential impacts to avian species, and incorporated that information into the revised route network in Alternative 5. Route designations take into consideration the designation criteria for important avian species areas. Surgical designation changes were considered with regards to avian species to incorporate route specific public comments where appropriate.	
<b><i>Index to Comments</i></b>	

	Defenders of Wildlife and Sierra Club	176-41, 176-66, 176-67
	Center for Biological Diversity	379-67, 379-68, 379-69, 379-70, 379-71, 379-72, 379-73, 379-74
<b>Comment 4.9-18: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (b) – Mitigation Lands</b>		
<p><b>Summary of Comments:</b>                  These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (b) is inadequate, is not provided at all in the DSEIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of impacts to lands established as mitigation lands for solar and other projects.</p>		
<p><b>Response to Comments:</b>                  These are general comments that state a preference for closure of routes based only on their presence in or proximity to mitigation lands. There is no regulation or requirement for BLM to limit access in or near mitigation lands or preclude route designation within these areas. Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Presence in or proximity to mitigation lands, on its own, is not a criterion in 43 CFR 8342.1 and therefore was not directly used as a criterion in the WMRNP analysis. However, in cases where routes within or adjacent to mitigation lands could be closed without unacceptable disruption to access needs, such as in the Desert Tortoise Research Natural Area, then these routes were closed. BLM has solicited input from the public and resource agencies regarding routes that may be causing user conflicts or resource impacts, including cases where these impacts are caused by routes within or adjacent to mitigation lands. BLM has made changes in response to this input, and will continue to solicit input and make appropriate route designation changes in the future.                  In some cases, access needs dictated a need for routes that are located within or adjacent to mitigation lands. Therefore, the presence of a route within or adjacent to mitigation lands, on its own, cannot be used to close routes. BLM is not making any route designations on lands not under BLM management.</p>		
<b>Index to Comments</b>		
	Desert Tortoise Preserve Committee	117-17
	Defenders of Wildlife and Sierra Club	176-1, 176-2, 176-20, 176-40
	The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-79
<b>Comment 4.9-19: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (b) – Bighorn Sheep</b>		
<p><b>Summary of Comments:</b>                  These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (b) is inadequate, is not provided at all in the DSEIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of impacts to bighorn sheep.</p>		

<b><i>Response to Comments:</i></b>	
Impacts to the bighorn sheep are discussed throughout Section 4.4.2 Wildlife Resources and specifically on page 4.4-43. BLM is required to consider the best available data when conducting the NEPA analysis and there is no requirement for BLM to survey each individual species in order to complete NEPA analysis. BLM acquired and evaluated GIS layers related to potential impacts to Bighorn sheep, and incorporated that information into the revised route network in Alternative 5. Route designations take into consideration the designation criteria for important Bighorn sheep areas. Surgical designation changes were considered with regards to Bighorn sheep to incorporate route specific public comments where appropriate.	
<b><i>Index to Comments</i></b>	
Defenders of Wildlife and Sierra Club	176-43, 176-64
Western Watersheds Project	411-19
<b>Comment 4.9-20: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (c)</b>	
<b><i>Summary of Comments:</i></b>	
These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (c) is inadequate, is not provided at all in the DSEIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments generally cite one or more impacts covered under 43 CFR 8342.1 (c), including conflicts between off-road vehicle use and other recreation uses, compatibility of off-road vehicle use with existing conditions in populated areas, taking into account noise and other factors. BLM acquired and evaluated GIS layers related to 43 CFR 8342.1, and incorporated that information into the revised route network in Alternative 5. Route designations take into consideration to 43 CFR 8342.1. Surgical designation changes were considered with regards to 43 CFR 8342.1 to incorporate route specific public comments where appropriate.	
<b><i>Response to Comments:</i></b>	
These are general comments that state that the analysis of conflicts between off-road vehicle use and other recreation uses, compatibility of off-road vehicle use with existing conditions in populated areas, taking into account noise and other factors, is inadequate. BLM has solicited input from the public regarding routes that may be causing user conflicts and received many route-specific comments related to conflicts with personal property. BLM has made changes in response to this public input, particularly increasing the routes with the subdesignation of “street legal”, and will continue to solicit public input and make appropriate route designation changes in the future.	
<b><i>Index to Comments</i></b>	
Center for Biological Diversity	379-13, 379-36
<b>Comment 4.9-21: The DSEIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (d)</b>	
<b><i>Summary of Comments:</i></b>	
These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (d) is inadequate, is not provided at all in the DSEIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments generally cite the route network in officially designated Wilderness Areas or Wilderness Study Areas.	

<b><i>Response to Comments:</i></b>	
BLM is not designating routes within designated wilderness areas. Presence of routes in WSAs and LWC areas were considered in the designation of all routes, using the process described in Section 2.1.4 of the DSEIS. Route designations are based on the lands which have been designated to be managed for wilderness characteristics under DRECP. For each of the individual routes or areas cited in the comments, BLM reviewed and re-considered the proposed designation.	
<b><i>Index to Comments</i></b>	
Defenders of Wildlife and Sierra Club	176-68
Paul Pearson	204-2
Center for Biological Diversity	379-14, 379-15
<b>Comment 4.9-22: The DSEIS does not properly analyze impacts to conservation areas and areas with disturbance caps established under DRECP</b>	
<b><i>Summary of Comments:</i></b>	
These comments request better coordination between WMRNP and DRECP. Some comments state that WMRNP does not incorporate the changes that were made under DRECP. Some comments request that the WMRNP SEIS discuss how the DRECP disturbance caps were considered. Many commenters included their DRECP comments as an attachment to the WMRNP comments.	
<b><i>Response to Comments:</i></b>	
The Draft SEIS incorporates all changes in land management and resource protection associated with DRECP. All routes within the inventory, whether designated open or closed, are included in the baseline calculations for disturbance. Routes designated from the inventory baseline are considered existing disturbances, and conservation and management actions related to new disturbance do not apply.	
<b><i>Index to Comments</i></b>	
Pam Nelson	62-3
Comment letter #4 is a form letter received from approximately 3,520 commenters	64-2
California Native Plant Society	179-6, 179-11, 179-12, 179-13
Chris Lish	333-2
F Hammer	335-2
Roman LoBianco	336-2
Kathleen McConn	339-2
Katie Fagan	341-2
Stewart Wilber	342-2
Desert Tortoise Council	380-91
Carla Cicchi	405-2
Western Watersheds Project	411-3
<b>Comment 4.9-23: The DSEIS does not properly analyze impacts that would occur to National Park Service lands</b>	

<b>Summary of Comments:</b>	
These comments state that the analysis in the DSEIS does not properly address impacts that would occur to National Park Service lands. The comments do not specify what impacts should be evaluated, and do not identify specific text that is deficient. BLM acquired and evaluated GIS layers related to potential impacts to National Park Service Lands, and incorporated that information into the revised route network in Alternative 5. Route designations take into consideration the designation criteria for important National Park Service Lands. Surgical designation changes were considered with regards to National Park Service Lands to incorporate route specific public comments where appropriate.	
<b>Response to Comments:</b>	
BLM coordinated with the National Park Service regarding route designation and impacts to National Park Service lands, as well as other adjacent jurisdictions.	
<b>Index to Comments</b>	
Gordon Zittel	199-7
<b>Comment 4.9-24: DSEIS must address ability for BLM to implement and enforce the Minimization Measures</b>	
<b>Summary of Comments:</b>	
These comments generally state that the DSEIS should address the ability for BLM to implement and enforce the minimization measures, including the necessary funding to provide enforcement.	
<b>Response to Comments:</b>	
Implementation and enforcement of route designations are discussed in the TMPs; implementation is discussed throughout Travel and Transportation Implementation and enforcement is discussed in Education and Outreach.	
<b>Index to Comments</b>	
Defenders of Wildlife and Sierra Club	176-6, 176-24, 176-29, 176-30, 176-31, 176-55
California Native Plant Society	179-18, 179-19, 179-20
Comment letter #195 is a form letter received from 6 commenters	195-4, 195-5
Paul Pearson	204-4
Margaret Adam	211-4
Paul Hadley and Wendy Hadley	215-3
Desert Tortoise Council	380-84, 380-152
Desert Tortoise Council	412-4, 412-35, 412-54, 412-59, 412-136, 412-157
<b>Comment 4.9-25: DSEIS must address impacts on enforcement by other agencies</b>	
<b>Summary of Comments:</b>	
These comments state that the DSEIS must include an evaluation of the impact of the WMRNP on the capacity or capability of other enforcement agencies to respond to OHV-related complaints.	
<b>Response to Comments:</b>	
Route designation should not impair the ability of other enforcement agencies to respond to complaints within their jurisdictions. BLM is responsible for responding to OHV-related complaints on BLM lands. It is the responsibility of other law enforcement agencies to respond to OHV complaints on lands that are not managed by BLM. BLM has coordinated with adjacent jurisdictions, including counties, to ensure that appropriate access is maintained on BLM lands for their required activities, such as law enforcement.	
<b>Index to Comments</b>	
Pam Nelson	62-6

	Sean Blau	114-8
	Defenders of Wildlife and Sierra Club	176-3, 176-4
	Center for Biological Diversity	379-35
<b>Comment 4.9-26: The analysis of economic impacts to tourism, the tourism economy, and property values are not sufficient</b>		
	<b>Summary of Comments:</b> These comments state that the DSEIS should include an analysis of the economic impacts of the alternatives on property values, tourism, and the tourism economy. The comments generally imply that the impact is negative.	
	<b>Response to Comments:</b> BLM acquired and evaluated GIS layers related to potential impacts to the economy, and incorporated that information into the revised route network in Alternative 5. Route designations take into consideration the designation criteria important to the American economy. Surgical designation changes were considered with regards to the economy to incorporate route specific public comments where appropriate.	
	<b>Index to Comments</b>	
	Adrian Field, Blanca Martinez, Paul Pearson, Olive Toscani	166-9
	Chris Carraher, Eric Hamburg, Beth Sheffield, Ken Sitz, Teresa Sitz	178-4, 178-5, 178-10, 178-8
	Doria Talley	180-2
	Comment letter #196 is a form letter received from 5 commenters	196-3
	Margaret Adam	211-2
<b>Comment 4.9-27: The cumulative analysis in the DSEIS does not include the detailed analyses required by NEPA</b>		
	<b>Summary of Comments:</b> These comments generally state the cumulative impact analysis in the DSEIS does not contain the level of detail required, or request specific analysis of cumulative impacts associated with renewable energy projects. The comments do not provide specific examples, or identify specific text in the DSEIS that is deficient.	
	<b>Response to Comments:</b> Section 4.15 acknowledges renewable energy projects as part of the cumulative scenario, and discuss their cumulative impacts with respect to global climate change and biological resources. In addition, the integration of the WMRNP with the DRECP incorporates the analysis of renewable energy projects considered in the DRECP.	
	<b>Index to Comments</b>	
	Center for Biological Diversity	379-38
	Desert Tortoise Council	380-24
	California 4 Wheel Drive Association	406-16
	Western Watersheds Project	411-13
<b>Comment 4.9-28: Recommendations for specific wording changes or factual corrections in the DSEIS</b>		
	<b>Summary of Comments:</b> These comments recommend specific wording changes or factual corrections to be made in the DSEIS. Some of the comments are made by other agencies or landowners, in order to provide a more accurate description of their agency, their lands, or their role in transportation planning. Others are made by reviewers who noted inaccurate statements or missing analyses in the DSEIS. Some commenters identified text that had been adopted out of the 2006 WEMO EIS, without having been updated. Some comments recommended additional projects to be included in the cumulative analysis.	

<b><i>Response to Comments:</i></b> The agency has reviewed the individual proposed text changes, and made corrections to the text of the Draft SEIS, where appropriate.	
<b><i>Index to Comments</i></b>	
Randy Banis	138-13, 138-14
W Peter Vanderlaag	330-1, 330-2, 330-3
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society	377-58, 377-59, 377-60, 377-80, 377-90, 377-94, 377-99, 377-140, 377-141, 377-142, 377-143, 377-144, 377-147
Center for Biological Diversity	379-26, 379-28, 379-29, 378-44, 379-75, 379-88, 379-94

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	Desert Tortoise Council	380-11, 380-12, 380-13, 380-14, 380-15, 380-16, 380-23, 380-27, 380-28, 380-29, 380-30, 380-4, 380-47, 380-49, 380-50, 380-55, 380-56, 380-61, 380-64, 380-68, 380-71, 380-72, 380-74, 380-75, 380-76, 380-83, 380-85, 380-87, 380-92, 380-93, 380-94, 380-95, 380-96, 380-100, 380-102, 380-104, 380-105, 380-106, 380-107, 380-108, 380-109, 380-113, 380-114, 380-115, 380-117, 380-118, 380-124, 380-125, 380-126, 380-127, 380-128, 380-129, 380-130, 380-131, 380-134, 380-135, 380-136, 380-138, 380-139, 380-140, 380-141, 380-142, 380-143, 380-144, 380-145, 380-146, 380-148, 380-151, 380-153, 380-154, 380-155, 380-156, 380-157, 380-158, 380-161, 380-164, 380-166, 380-178, 380-187, 380-188, 380-190, 380-193, 380-195, 380-196, 380-197, 380-200, 380-202, 380-203, 380-204, 380-205, 380-206, 380-207, 380-208, 380-209
	Town of Apple Valley	382-4, 382-6
	Jay and Karen Moon, Ron and Jonna Kemper, Billy & Julie Mitchell, Jon Stone (Allotment Lessees)	393-5

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Nord Embroden	394-1, 394-2, 394-3, 394-4
San Manuel Band of Mission Indians	396-1
California Off-Road Vehicle Association	399-5
Kerncrest Audubon Society	400-3
Michael Degnan	402-1, 402-2
US EPA, Region IX	403-2
California 4 Wheel Drive Association	406-8, 406-17

	Desert Tortoise Council	412-21, 412-22, 412-23, 412-24, 412-25, 412-26, 412-27, 412-38, 412-39, 412-49, 412-50, 412-53, 412-55, 412-56, 412-61, 412-68, 412-70, 412-71, 412-72, 412-75, 412-76, 412-77, 412-79, 412-85, 412-86, 412-87, 412-88, 412-89, 412-90, 412-91, 412-92, 412-93, 412-94, 412-95, 412-96, 412-97, 412-100, 412-101, 412-102, 412-103, 412-104, 412-105, 412-106, 412-107, 412-108, 412-109, 412-110, 412-111, 412-112, 412-113, 412-114, 412-115, 412-116, 412-117, 412-118, 412-119, 412-120, 412-121, 412-122, 412-123, 412-124, 412-125, 412-126, 412-127, 412-128, 412-129, 412-130, 412-131, 412-132, 412-135, 412-137, 412-138, 412-139, 412-140, 412-142, 412-143, 412-146, 412-147, 412-148, 412-149, 412-150, 412-151, 412-153, 412-154, 412-156
<b>Comment 4.9-29: The analysis does not adequately address the benefits of motorized recreation</b>		
	<p><i>Summary of Comments:</i>          These comments state that the Draft EIS does not address the impacts on and benefits of motorized recreation and state that the impacts considered under 43 CFR 8342.1 are overstated.</p>	

<b><i>Response to Comments:</i></b>	
Section 4.6 quantifies the mileage of recreational routes under each route network alternative in the same way that other resource sections quantify the mileage of routes in areas covered by resource protections. The SEIS makes no attempt to imply that mileage of routes in resource protection areas is more or less important than mileage of routes associated with recreation. It simply provides the data so that BLM staff can weigh the adverse and beneficial impacts and make informed decisions. Similarly, Section 4.5 discusses the adverse and beneficial economic impacts of both recreation and natural resources, and does not imply that one is of more value than the other.	
<b><i>Index to Comments</i></b>	
Capital Trail Vehicle Association	54-6, 54-7, 54-8, 54-9, 54-10, 54-11, 54-13, 54-16, 54-17, 54-18, 54-19, 54-20, 54-21
California 4 Wheel Drive Association	406-1, 406-2, 406-14
<b>Comment 4.9-30: Route or area-specific comments that did not provide Route Number</b>	
<b><i>Summary of Comments:</i></b>	
These comments request that designations of routes in specific areas be modified, but they do not provide a route number.	
<b><i>Response to Comments:</i></b>	
<b><i>Index to Comments</i></b>	
Pat Flanagan (Lucerne Valley DFA)	52-1
Desert Tortoise Preserve Committee (TMA 7, Western Rand ACEC)	117-11
Desert Tortoise Preserve Committee (Ord Rodman Allotment)	117-15
Pacific Crest Trail Association (PCT)	135-2, 135-3, 135-5
Beth Sheffield (Mesa Road)	174-1
Defenders of Wildlife and Sierra Club (Afton Canyon)	176-62, 176-63, 176-64, 176-65, 176-66, 176-67, 176-68, 176-69
Defenders of Wildlife and Sierra Club (Lower Sweetwater Spring)	176-72
Chris Carraher, Eric Hamburg, Beth Sheffield, Ken Sitz, Teresa Sitz (Wonder Valley)	178-6
U.S. Marine Corps Installations West (Sunshine Peak Range Training Area and Black Top Training Area)	183-6
Peggy Lee Kennedy (Copper Mountains and Sunfair Dry Lake)	186-1
John Pickett (North Cady Mountains)	188-1
James Erickson (TMA 3, Map 17)	191-1, 191-2
Jim Wilson (El Mirage OHV Park)	198-1
Gordon Zittel (roads south of Highway 62)	199-8
Jim Wilson (El Mirage)	200-1
Teresa Sitz (Old Amboy Road)	203-1
Paul Pearson (Pipeline Road)	204-6
Neil Weirenga (Section 5 east of Onaga and north of Doggie Trail)	218-1
Carol Wiley (Afton Canyon)	228-3
Lynne Maddux (South Downs Road)	229-1

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Mary Robertson (Superior Dry Lake)	230-1
IfrostYJ23 (no name given) (Superior Dry Lake)	247-1
Patricia Printa (Section 5 in Joshua Tree)	254-1
Jean Doyle (TMA 3, Map 17)	292-1
Lance LeVoir (TMA 3 Maps 19 and 20)	275-1
Lance LeVoir (TMA 3 Maps 13 and 14)	275-2
Carl Masse (Superior Dry Lake)	338-1
Lester Robinson (Superior Dry Lake)	349-1
Richard McDowell (Old Ironage Road)	350-1
Richard McDowell (Sheephole Mountains)	350-2
Ron Banuk (Route 135247 and 135248)	363-1
Wilderness Society, California Wilderness Coalition, Friends of Inyo, Conservation Lands Foundation, and California Native Plant Society (Middle Knob)	377-89
Wilderness Society, California Wilderness Coalition, Friends of Inyo, Conservation Lands Foundation, and California Native Plant Society (Middle Knob)	377-122
Wilderness Society, California Wilderness Coalition, Friends of Inyo, Conservation Lands Foundation, and California Native Plant Society (Sleeping Beauty)	377-126
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society (Map provided)	377-150
The Wilderness Society, Friends of Inyo, Conservation Lands Foundation, California Wilderness Coalition, California Native Plants Society (Cady Mountains)	377-373
Desert Tortoise Council (camping along 20 Mule Team Road)	380-12
Desert Tortoise Council (Dove Springs Open OHV Area)	380-31
Desert Tortoise Council (Red Rock Canyon)	380-45
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**WEST MOJAVE (WEMO) ROUTE NETWORK PROJECT  
SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT**

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Carl Eberly (Superior Dry Lake)	379-1
Diane Kuntz (Section 5 west of Quail Springs Road)	401-1
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